

Alex Robertson
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Dear Alex

SIRO's ANNUAL OPINION TO SUPPORT THE GOVERNANCE STATEMENT IN THE ANNUAL REPORT AND ACCOUNTS FOR YEAR ENDING MARCH 2025.

I am required by HMG Security Policy Framework to provide you with an annual assessment on information risk to help inform the governance statement in the annual report and accounts.

I have consulted with the several Information Asset Owners within Transport Focus on this opinion and have additionally shared this letter with the Audit and Risk Assurance Committee at its meeting on 15 April 2025. I shall also place a copy of this letter on our website.

Information Asset Owners keep their information assets under review during the year. As many are new to this role, a Data Protection by Design and Default Survey has been conducted this year (the survey also included Directors and Heads of Times, Insight and IT) and this has provided useful food for thought in developing an information governance plan for 2025-26.

The Information Strategy Group (ISG) has only recently begun to meet quarterly again, given the significant restructuring of the business in 2024-25. It reviews matters of information risk. This includes issues that we consider to be relevant and proportionate, and may be based on any guidance from the Audit and Risk Assurance Committee. The ISG will again, going forward, also review the Record of Processing Activities (RoPA) and risk assessment for appropriate information assets which is then made available for review by the ARAC. Further to a recent internal audit recommendation, Senior Leadership Team will henceforth have visibility of ISG notes and key issues arising from them.

I have spent some time with the IAO / DPO at London TravelWatch, this year, assisting in bringing the LTW RoPA up to date, and other matters. This collaboration remains particularly important given the enduring data processing arrangements between the two organisations.

As I reported last year, our new staff have been asked to complete mandatory awareness training this year. Awareness training for all other staff has been deferred to Q1-2 2025-26 given the significant amount of other training during Q4 2024-25.

In respect of current projects, data privacy impact assessment screens in project workbooks are completed routinely, and no project is sent for approval unless the screen has been reviewed and authorised by me. An update to this screen remains work in progress. A non-project DPIA screen has been implemented during 2024-25 and is now in regular use.

The Collaboration Agreement with London TravelWatch was fully updated for the new business year and was re-approved by our Board in March 2025. The two data processing agreements annexed to the Agreement remain extant.

I have advised on many data protection issues, and concluded data processing agreements as required, over the course of the year.

Compliance with Freedom of Information Act requests during the year has been good and all are reported to the quarterly ARAC meetings. One request triggered an internal review (as provided for under section 45 of the Act.) There have been no requests in respect of GDPR rights (subject access, rectification, erasure etc) this year. Our casework team continues to manage the flow of such requests efficiently and effectively. A review of the information we regularly provide under our Publication Scheme is also work in progress, as is a cleanse of our stakeholder management system.

I met with our data protection advisor at year-end to discuss future plans for information governance.

I am of the opinion that, in respect of information risk, both Transport Focus and London TravelWatch remain low risk organisations, and that the actions we have taken as described above are relevant and proportionate to the risks we face. **There have been no reportable data breaches during the year.**

I would therefore advise you that you should have no concern in claiming broad, proportionate, compliance with HMG Security Policy Framework (as it relates to information risk), and the data protection regulations currently in force, within our annual governance statement.

Finally, I should like to add that those staff directly involved in the management of data take their responsibilities very seriously. I am very grateful to all of them for this – it would be impossible for me to do my job if this was not the case. This group not only includes our information asset owners, and casework team, but others who help in managing data in general.

Yours sincerely,

Jon Carter

JON CARTER

Head of governance and risk

Senior Information Risk Owner (SIRO) and UK-GDPR Data Protection Officer (DPO)