

1. ISLE OF ANGLESEY COUNTY COUNCIL	
<b>Report to:</b>	Governance and Audit Committee
<b>Date:</b>	3 February 2026
<b>Subject:</b>	Information Governance in Schools 2024-25
<b>Head of Service:</b>	Aaron Evans Director of Education, Skills and Young People aaronevans@ynysmon.llyw.cymru
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<b>Nature and Reason for Reporting:</b> The Governance and Audit Committee's terms of reference has an explicit requirement for the committee to consider the council's assurance framework and ensure that it adequately addresses the risks and priorities of the Council (3.4.8.7.1). The committee will ensure there is clarity of what assurance is provided, that there is a clear allocation of responsibility for providing assurance and duplication is avoided (3.4.8.7.2). To this end, the committee will receive annual assurance reports, including a report regarding Information Governance in Schools (3.4.8.7.3).	

## 1. Introduction

- 1.1 This report provides the Governance and Audit Committee with annual assurance on the effectiveness of information governance and data protection in maintained schools. It offers a proportionate, risk-based update, highlights key issues and controls, and informs the Council's SIRO Annual Report

## 2. Recommendation

- 2.1 That the Governance and Audit Committee notes the assurance provided by the Temporary Schools Data Protection Officer.

## **1. Purpose of the Report**

This report provides the Governance and Audit Committee with an annual assurance statement on the effectiveness of information governance and data protection arrangements across maintained schools.

The report is intended to:

- provide a proportionate, risk-based assurance update,
- highlight key issues and controls, and
- inform the Council's Senior Information Risk Owner (SIRO) Annual Report.

## **2. Context and Temporary DPO Arrangements**

During the reporting period, the Schools Data Protection Officer role has been covered on a temporary basis, on average one day per week (more when required), during the long-term absence of the substantive postholder.

The focus of the Temporary Schools DPO role has been to:

- maintain statutory compliance,
- manage live risks and incidents,
- provide continuity of advice and support to schools, and
- act as a central escalation and assurance point.

Given the limited capacity, work has been risk-prioritised, with emphasis on statutory duties, incidents, and high-risk issues rather than proactive audit or development activity.

## **3. Scope of Assurance**

This report covers:

- maintained primary, secondary and special schools receiving Schools DPO support,
- compliance with the UK GDPR and Data Protection Act 2018,
- information rights handling, incident management and risk escalation, and
- the effectiveness of controls operating at school level.

## **4. Overall Assurance Opinion**

### **Assurance Level: Reasonable Assurance**

Based on work undertaken during the reporting period, the Temporary Schools DPO provides Reasonable Assurance that:

- schools generally have appropriate data protection policies and procedures in place,
- day-to-day information handling practices are largely sound,

- reported incidents, breaches and information rights requests are being identified and managed appropriately, and
- escalation routes to corporate services and the SIRO are operating effectively.

However, further improvement is required to strengthen assurance in relation to:

- consistency of refresher training and training records,
- schools' ability to evidence ongoing compliance and self-monitoring, and
- completion and maintenance of formal documentation such as Records of Processing Activities (ROPA) and Data Protection Impact Assessments (DPIAs).

## **5. Key Activities and Outputs**

Despite limited DPO capacity, the following core activities were maintained to support compliance and risk management:

### **Advice, guidance and point of contact**

- The Temporary Schools DPO responded to day-to-day enquiries from schools relating to:
  - Subject Access Requests (SARs) and education records requests,
  - general data protection and information governance queries,
  - reported data breaches and potential data breaches.
- Support focused on lawful processing, appropriate redaction, statutory timescales and proportionate risk management.

### **Incident and risk management**

- Schools were supported to assess, contain and manage data breaches and near-miss incidents.
- Advice was provided on ICO reporting thresholds and remedial actions, with escalation where required.

### **Training and awareness**

- A data protection training session was delivered during a scheduled school training day, reinforcing staff responsibilities and common risk areas.
- Schools were reminded of the importance of refresher training and maintaining records of attendance for accountability purposes.

### **Communication and reminders**

- Regular input was provided into the weekly schools bulletin to:
  - remind schools of their statutory data protection responsibilities,
  - highlight recurring issues arising from incidents and enquiries, and
  - promote good information governance practice.

These activities helped ensure continuity of compliance and encouraged early engagement with the DPO function during the absence of the substantive postholder.

## 6. Key Risks Identified

The following strategic risks are highlighted for the Committee's awareness:

<b>Risk</b>	<b>Summary</b>
<b>Training coverage</b>	Refresher training is inconsistent and not always formally evidenced across schools.
<b>Evidence of compliance</b>	Some schools lack clear documentation to demonstrate regular monitoring and compliance activity.
<b>Documentation maturity</b>	ROPA, DPIAs and asset registers are at varying stages of completion and review.
<b>Capacity constraints</b>	Limited temporary DPO capacity restricts proactive audit and development activity.

These risks are recognised and are being managed proportionately, with escalation where appropriate.

## 7. Control Environment and Mitigations

Key controls currently in place include:

- a centralised DPO advice and escalation route,
- established policies, templates and guidance for schools,
- training materials and awareness activity,
- prioritisation of live risks, incidents and statutory obligations.

Together, these controls support continued compliance but would benefit from further strengthening.

## 8. Forward and Priorities

The following priorities are recommended for the next reporting period:

- a) Stabilisation of Schools DPO capacity to support proactive assurance activity.
- b) Improved training oversight, including refresher coverage and training records.
- c) Stronger evidence of compliance through proportionate self-assessment or targeted audit.
- d) Continued readiness for legislative change in data protection.

## 9. Conclusion

Within the constraints of a temporary and limited arrangement, the schools DPO function has:

- maintained statutory compliance,

- supported schools effectively with live risks and incidents, and
- provided reasonable assurance on information governance arrangements.

The issues identified are consistent with previous reporting and are manageable with sustained focus and appropriate resourcing.