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# **Police and Crime Commissioner's Office**

## **Data Protection & Information Governance annual**

### **compliance report.**

01/04/2025 – 31/03/2026

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### 1. Introduction

The Police and Crime Commissioner, as the Data Controller for the Office of the Police and Crime Commissioner (OPCC), has a statutory responsibility to ensure that personal data is processed lawfully, fairly, and transparently, in accordance with the requirements of the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

Additionally, the OPCC must meet its obligations in relation to Freedom of Information (FOI), Subject Access Requests (SARs), and appropriate information and records management practices. Effective information governance is essential to maintaining public trust, safeguarding personal data, and ensuring that information is handled lawfully, transparently and securely.

This report provides an overview of Data Protection and Information Governance compliance within the Office of the Police and Crime Commissioner (OPCC) for Dyfed-Powys for the period 1 April 2025 to 31 March 2026.

### 2. Policies and Procedures

Some policies and procedures are jointly developed and operated by the OPCC and Dyfed-Powys Police. Where joint arrangements exist, both organisations are committed to ensuring that personal data is processed in accordance with UK GDPR, with clear roles, responsibilities, and safeguards in place.

Listed below are policies and procedure owned by the OPCC which have been reviewed during the 2025/26 reporting period.

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- OPCC FOI Policy and Procedures
- OPCC Records Management Policy
- Volunteer policy
- OPCC Retention Policy & Schedule
- Decision making policy

Where appropriate policies are published externally on the PCC's website.

### **3. Data Protection Compliance**

#### Data Protection Impact Assessments (DPIA)

DPIAs form a key component of the OPCC's risk management framework, supporting the early identification and mitigation of potential data protection risks. The Data Protection Officer provides oversight and advice to ensure a consistent and compliant approach.

##### OPCC- Owned Data

During this period no DPIAs were completed as no new processing activities or changes to existing processing were identified that required a DPIA under the organisation's data protection controls.

##### Force Shared Data and Commissioned Services

A small number of DPIAs were triggered for initiatives relating to funding projects and commissioned services. For these projects the Chief Constable acts as Data Controller for the source operational data. During this reporting period, delays were experienced in the completion and final sign off of these DPIA's. As a result, this was recognized as a risk and is reflected within both the OPCC and Force Corporate Risk Registers. Actions are in places to strengthen processes and ensure DPIAs are consistently undertaken at the earliest stage of a project and commissioning activity.

One DPIA was completed for an OPCC Community Scrutiny Panel where members of the public would review Body Worn Video of closed cases to assess whether officers' use of police powers was reasonable and proportionate.

#### Record of Processing Activities (ROPA) and Information Asset Register

In line with UK GDPR requirements, the OPCC maintains a Record of Processing Activities (ROPA) to document the personal data it processes and the lawful basis for that processing. This record is subject to ongoing review and update to ensure it remains accurate and reflective of current activities.

The Information Asset Register (IAR) is also under review and is currently being aligned and cross-checked against the ROPA to strengthen consistency, improve oversight of data assets, and support overall information governance and compliance.

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#### Privacy Notices

The OPCC maintains a [privacy notice](#) to support transparency in how personal data is collected, used, and shared, in accordance with UK GDPR requirements. A planned review will be undertaken during the next reporting period to ensure that the privacy notice remains accurate, up to date, and aligned with current processing activities, thereby maintaining continued compliance with transparency obligations.

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#### **4. Data Breaches**

During 2024/2025 there was one data breach recorded. The breach was in relation to an email sent to Sancus Solutions which contained a document that included details of individuals not involved with a specific complaint case. Sancus Solutions are the organisation that considers OPCC complaint reviews and therefore all information is sent securely and to a nominated individual, therefore the risk was low. The individual informed the DPO and Sancus were asked to delete the information. The breach did not meet the requirements to be referred to the ICO.

#### **5. Records Management**

Records Management ensures that official records of historical, financial, and legal value are identified and preserved, and that non-essential records are discarded in a timely manner according to established guidelines and identified legislation. Good records management also ensures that the OPCC can comply with the Freedom of Information Act (FOIA) and Data Protection legislation as well as requests from other regulatory bodies and auditors. Poor records management can lead to poor decisions being made based on inadequate or incomplete information, reputational damage, failure to handle confidential information with the required level of security and unnecessary costs being incurred due to records being kept for longer than needed.

During this period a working group was established to ensure that all departments within the office were involved in the record review process. An action tracker was developed which lists files/ folders which have been reviewed and marked for review or deletion.

#### **6. Freedom of Information Act (FOIA)**

As a corporation sole, the OPCC are subject to and responsible for FOIA requests. The FOI Act gives everyone the right to request any recorded information held by a public authority. The right only covers recorded information which includes information held on computers, in emails and in printed or handwritten documents as well as images, video and audio recordings. FOIA sets a statutory deadline of 20 working days for public authorities to respond to requests for information.

During this period 52 FOI requests were received in the 2025-26 financial year, an increase of 5 from the previous year.

Out of the 52 FOI requests received, 31 required a response from the OPCC. The remaining 21 requests were identified as requiring consideration of the Force, advice was provided on how to submit an FOI directly to Dyfed Powys Police. Of the requests managed by the OPCC, 90% were responded to within the statutory 20 working day timescale. The categories requests for which the OPCC held the information included:

- Commissioned Services

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- Funding external organisations/campaign groups
- ICT systems
- Police Precepts
- Scrutiny conducted by PC
- Misconduct and Complaints
- HR and Staffing

## **7. Subject Access Requests**

The FOI Act 2000 also gives everyone the right to ask an organisation whether or not they are using or storing their personal information. A person can also ask for copies of their personal information, verbally or in writing. The OPCC are required to respond to any such requests within one month.

During this period 9 SAR's have been received, however, the OPCC did not hold information on 7 of the requests and these were all sent details informing them how to make their request to the Force who may or may not hold the information requested.

The OPCC did hold the information for 2 requests. The information was in relation to personal data of the requestor, and this was collated and sent to the individual within the legislative timescales.

All of the SARs were completed within the statutory timescale.

## **8. Training**

During the reporting period, the OPCC has maintained its commitment to ensuring staff are appropriately trained in data protection and information governance matters. This has included attendance at a CPD event on Data Protection, SIRO-level training to enhance strategic oversight of information risk, and FOI Fundamentals training to support operational compliance with information rights legislation. These activities have strengthened organisational awareness and capability, contributing to the effective management of information and supporting compliance with statutory obligations.

## **Forward Look**

During the coming year, priority will be given to the development and review of the OPCC's Record of Processing Activities (ROPA) and Information Asset Register, following the identification of this area as requiring further strengthening. Enhancing these core governance tools will support compliance with UK GDPR requirements, improve understanding of data processing activities, and strengthen overall information governance and risk management.

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Additionally, the OPCC will undergo an internal audit to assess the effectiveness of current processes and procedures, providing further assurance and identifying any areas for improvement.

Ongoing staff development will also remain a key focus, with further Data Protection Officer (DPO) training to be delivered and attendance at national Continuing Professional Development (CPD) events to ensure knowledge is maintained and aligned with emerging best practice and regulatory expectations.