



**Report:** OPCC Data Protection Report 2024/25

**Report to:** Chair and Members of the Cleveland Audit Committee

**Date:** 25<sup>th</sup> September 2025

**Status:** For information

**Executive Officer:** Rachelle Kipling, Head of Policy, Partnerships and Delivery (Data Protection Officer)

### **Annual Data Protection Report 2024/25**

#### **1. Purpose**

- 1.1 The purpose of this report is to provide members of the Cleveland Audit Committee with an annual update on the Office of the Police and Crime Commissioner (OPCC) Data Protection obligations during the 2024/25 period.

#### **2. Recommendation**

- 2.1 That members note the contents of the report.

#### **3. Background**

- 3.1 Police and Crime Commissioners (PCCs) are subject to the UK General Data Protection Regulations (UK GDPR) and the Data Protection Act 2018, which mandates the secure handling of personal data.
- 3.2 Under GDPR the PCC is the Data Controller. The Chief Executive and Monitoring Officer has delegated authority to carry out all functions and responsibilities of the Data Controller, although liability remains with the PCC as the 'corporation sole'.
- 3.3 The OPCC is registered with the Information Commissioner's Office (ICO) and ensures compliance with UK GDPR and Data Protection Act 2018 through the duties and responsibilities of the Data Protection Officer. This includes assisting in monitoring internal compliance, informing and advising on data protection obligations, providing advice regarding Data Protection Impact Assessments (DPIAs) and acting as a contact point for data subjects and the Information Commissioner's Office (ICO).

#### **4. Hardware/ Software and Systems**

- 4.1 The OPCC utilises the hardware/software and systems managed by Cleveland Police which ensures necessary technical, physical, personnel and procedural security controls to protect information held and accessed by the OPCC. This includes laptops, mobile phones, Microsoft Teams, access control etc.
- 4.2 However as referred above as a 'corporation sole' the PCC is responsible for the handling of their own Information Rights requests relating to personal information that they hold.

## **5. Information Rights**

### **5.1 Freedom of Information (FOI) Requests**

During the 2024/25 the OPCC handled thirty-three requests for information under the FOI act which can be broken down as below:

- 18 were responded to as a FOI from the OPCC
- 11 received by the OPCC which were for the attention of Cleveland Police
- 2 were Subject Access Requests for the attention of Cleveland Police
- 2 were casework queries as oppose to FOI requests

Of the thirty-three requests, the OPCC received one request for internal review. As per the Audit Committee Terms of Reference, the Audit Committee acted as the review body in support of the process.

### **5.2 Subject Access Requests (SAR)**

During 2024/25 year the OPCC received two SARs which were handled within the statutory timelines.

- 5.3 No other information Rights Requests were received during the reporting period.

## **6. Data Breaches**

- 6.1 During the reporting period the OPCC assessed four data breaches. The Data Protection Officer was promptly advised of all four breaches by team members enabling a thorough assessment to take place. This included consideration of the risk to the people involved in the breach and the likelihood and severity of the risk to the individuals rights and freedoms following the breach.
- 6.2 When a data breach occurs a full assessment is completed to understand the circumstances of the breach and to consider any opportunities from the ICO and organisational learning.

## **7 Conclusion**

- 7.1 The OPCC takes the handling of personal data extremely seriously ensuring Information Rights are handled efficiently and effectively as per UK GDPR and the Data Protection Act 2018.

- 7.2 Data Protection remains a risk on the OPCC risk register with mitigations in place to support management of the risk including annual e-learning training including 'Managing Information' and 'Government Security Classification'.

## **8. Implications**

### 8.1 Finance

None arise

### 8.2 Diversity and Equal Opportunities

None arise.

### 8.3 Human Rights Act

The UK GDPR and Data Protection Act 2018 clearly sets of individuals rights in terms of Data Protection. Compliance with these are through the duties and responsibilities of the Data Protection Officer.

### 8.4 Sustainability

None arise.

### 8.5 Risk

Data Protection remains a risk on the OPCC Corporate Risk Register