



Ref: FOIA Reference 2024/25-265

Date: 4th September 2024

Email foi@uhnm.nhs.uk

Dear Sir/Madam

I am writing to acknowledge receipt of your email dated 22nd July 2024 requesting information under the Freedom of Information Act (2000) regarding IG team

On 23rd July 2024 we contacted you via email with the following:
I have been asked to contact you for proof of identity and company name;

The FOI Act clearly states that If we suspect that the request has come from a Pseudonym we are entitled to request proof of the person's identity, as provision of a Pseudonym invalidates a request, therefore please can you provide a photo copy of your driver's licence or other official document that validates your identity.

The section 12 exemption states:

The authority can combine related requests received within a period of 60 consecutive days from:

- The same person or
- People who appear to be acting in concert or in pursuance of a campaign.

In addition

Section 8 – "Real name" checks

Can you please confirm that you are only submitting this request for your personal use or that of an unstructured group and not on behalf of a company/corporate body?

If you are making the request on behalf of a company/corporate body as an employee, then you should declare the real company name and this will enable us to consider the validity of the request.

On 6th August you replied with the following;

'I can confirm that this request is for my own personal use. However, i would like to point out, a release to me is a release to the wider world therefore your response should be published on your disclosure log and therefore any corporate organisation can see what is released anyway.

Also, the guidance you point to, it is not a document therefore I am not clear which paragraphs you are "drawing my attention to" However, I am unclear why you believe this is not my first request to you - I can confirm that this is the first request I have sent to you - if someone else has the same name as myself then why should I be penalised? What characteristics are suggesting I am working on behalf of a company/body

corporate - however, if I was from a company, my request is still valid - the ICO guidance stipulates that you can accept the companies name as a valid name of requestor - not a reason to decline it

https://gbr01.safelinks.protection.outlook.com/?url=https%3A%2F%2Ffeu-west-1.protection.sophos.com%2F%3F%3Dico.org.uk%26u%3DaHR0cHM6Ly9pY28ub3JnLnVrL2Zvci1vcmdhbmlzYXRpb25zL2ZvaS9mcmVIZG9tLW9mLWluZm9ybWFOaW9uLWFuZC1lbnZpcm9ubWVudGFsLWluZm9ybWFOaW9uLXJlZ3VsYXRpb25zL3JlY29nbmlzaW5nLWEtcmlvxdWVzdC1tYWRLXVuzGVyLXRoZS1mcmVIZG9tLW9mLWluZm9ybWFOaW9uLWFuZC1zZWNOaW9uLTqvi3doYXRpc21YW50%26i%3DNjYjdmNDVjOTM5YTQxMThlOWFmYzZj%26t%3DQXY1Q0dtZm9ycDIYOURKSUF1Sl5dVdldW8xV21YQWNxODh5MHFFdnFaVT0%3D%26h%3Db623a6741d164990bd3f5d538bc842fe%26s%3DAVNPUEhUTONFTkNSWVBUSVZmrDY6w-eNcSnwJOzAXk1GffeQupdjilq-mD3QNJs9X2lwsJOUWoJeM9vFI_ZYUWs&data=05%7C02%7Cfoi%40uhnm.nhs.uk%7C021ec696a3f6493505ae08dcb62efa5f%7Cc52f36dcd35a4a8d9291804eb4965bd5%7C0%7C0%7C638585560349309620%7CUnknown%7CTWFpbgZsb3d8eyJWljoimc4wLjAwMDAiLCJljoiv2luMzliLCJBTil6lk1haWwiLCJXVCI6Mn0%3D%7C60000%7C%7C&sdata=Eq24Ozv9tcONUP7qITW%2BHQbxZp2lufmJMEqfcvYw1c%3D&reserved=0

Trust you will reconsider my request and proceed with the information requested'.

As of 1st November 2014 University Hospitals of North Midlands NHS Trust (UHNM) manages two hospital sites – Royal Stoke University Hospital, and County Hospital (Stafford). Therefore the response below is for the two sites combined from that date where appropriate.

Q1 I am interested in your information governance function and associated activities in your organisation and I request the following;

IG Team

- 1. A organisational structure of your information governance team including current bandings and details of their WTE as of today.**
- 2. A organisation structure of your information governance team including bandings and details of their WTE as of (or around) 01 July 2023.**
- 3. Copies of job descriptions of your current IG roles including any posts which may be vacant as of today.**
- 4. Copies of job descriptions of your IG roles including any posts which were vacant as of (or around) 01 July 2023.**
- 5. If there has been any change in structure and/or pay, please provide details of this and confirmation of where this was agreed (i.e. agenda for change scoring and minutes of meetings where this was agreed). If no change, is this planned for the future?**

A1 See below:

1. See attached
2. as per A1 (1).
3. See attached. These job descriptions refer to the information governance team.
4. See attached
5. The change in structure took place following a wider review of the team. The B5 post was assessed via job evaluation panel and the post approved via the recruitment approval process.

Q2 IAO/IAs

- 1. Please advise how many Information Asset Owners (IAOs) and Information Asset Administrators (IAAs) you have in the organisation as of today.**

2. Please advise how many Information Asset Owners (IAOs) and Information Asset Administrators (IAAs) you had in the organisation as 01 July 2023 (or nearest date).
3. Do you have any other associated roles in your organisation i.e. IG Champions? If so, how many do you have in the organisation as of today and as of 01 July 2023 and how were these determined?
4. Do you have any job descriptions/contracts/MOUS with your IAOs, IAAs and IG Champions or equivalent (if applicable)? If so, please provide copies.
5. Please provide copies of any training material you have used for IAOs/IAAs and IG champions or equivalent (if applicable).

A2 See below:

1. 139 Asset Owners and 137 asset administrators
2. 113 asset owners in place 1st July 2023.
3. No
4. Completion of Information Asset Owner Acceptance form & Information Asset Administrator Acceptance form. Attached.
5. See attached IAO handbook and Information asset owner training slides.

Q3 **Asset Management**

1. What software do you use to log your FOI requests?
2. What software do you use to log your information assets and your data flows?
3. What software do you use to capture your data protection impact assessments?
4. How many information assets have you identified in your organisation as of today?
5. How many information assets have you identified in your organisation as of 01 July 2023 (or nearest date).
6. Please provide a copy of your template used for capturing information asset / data flows.
7. Please provide a copy of your template used for your data protection impact assessments and data agreements (i.e. sharing/transfer/processing).

A3

1. Excel spread sheet
2. Information Assets (SharePoint Forms) & Dataflows (Excel spreadsheet stored on SharePoint)
3. Word documents for individual DPIAs
4. 296.
5. As of 12th July 2023, 247 assets
6. I've attached PDF copies of the asset register forms and an excel dataflow.
7. See attached

*Please note that any individuals identified do not give consent for their personal data to be processed for the purposes of direct marketing.

UHNM NHS Trust is a public sector body and governed by EU law. FOI requestors should note that any new Trust requirements over the EU threshold will be subject to these regulations and will be advertised for open competition accordingly.

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An anonymised copy of this request can be found on the Trust's disclosure log, please note that all requests can be found at the following link: <http://www.uhnm.nhs.uk/aboutus/Statutory-Policies-and-Procedures/Pages/Freedom-of-Information-Disclosure-Log.aspx>

This letter confirms the completion of this request. A log of this request and a copy of this letter will be held by the Trust.

If you have any queries related to the response provided please in the first instance contact my office.

Should you have a complaint about the response or the handling of your request, please also contact my office to request a review of this. If having exhausted the Trust's FOIA complaints process you are still not satisfied, you are entitled to approach the Information Commissioner's Office (ICO) and request an assessment of the manner in which the Trust has managed your request.

The Information Commissioner may be contacted at:

Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF or via www.ico.org.uk.

Yours,



Rachel Montinaro
Data Security and Protection Manager - Records