

Freedom of Information request 331-20

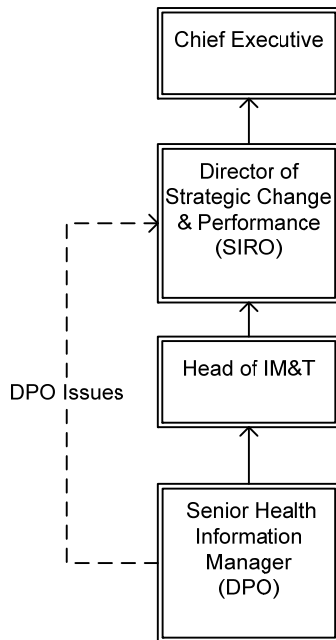
Request

1. Could you let me know?
 - a. What position in the Board is designated as Senior Information Risk Owner (SIRO)?
 - b. The name of your Data Protection Officer (DPO)?
 - c. Job title of the DPO, if not just DPO?
 - d. If the DPO also has other duties, approximately how much of their time is spent on DPO work?
 - e. If the DPO has other responsibilities, has a risk assessment been carried out to ensure that any potential conflicts of interest as identified in the GDPR and the guidance from the European Data Protection Board are managed? If so, has this been reviewed in light of the recent decision of the Belgium Data Protection Authority (28 April 2020): <https://edpo.com/news/dpo-and-conflict-of-interest-50-000e-fine-by-the-belgian-dpa/>
 - f. The line manager of the DPO – i.e. the post that the post holder reports to. Is it the SIRO?
 - g. Who the DPO reports to in their role as DPO if that differs from the line manager? Is it the SIRO?
 - h. At what spinal point is the DPO paid?
 - i. Key relevant qualifications that the DPO and SIRO hold or relevant training completed.
2. And could you provide the relevant extract of the Board's Organisation Chart that shows the DPO, the DPO's line manager, the post holder that the DPO reports to, the SIRO and Chief Executive?

Response

1.
 - a) Director of Strategic Change and Performance
 - b) George Ironside
 - c) Senior Health Information Manager
 - d) 40%
 - e) No
 - f) Reports to the Head of IM&T (who reports to the SIRO)
 - g) As above.
 - h) A&C Band 8A
 - i) Certificate in Healthcare Information Governance and Introduction to the Senior Information Risk Owner role

2. Please find below the extract of the Board's Organisation Chart as requested:



If you are not satisfied with the way your request has been handled or the decision given, you may ask NHS Borders to review its actions and the decision. If you would like to request a review please apply in writing to, Freedom of Information Review, NHS Borders, Room 2EC3, Education Centre, Borders General Hospital, Melrose, TD6 9BS or foi.enquiries@borders.scot.nhs.uk.

The request for a review should include your name and address for correspondence, the request for information to which the request relates and the issue which you wish to be reviewed. Please state the reference number **331-20** on this request. Your request should be made within 40 working days from receipt of this letter.

If following this review, you remain dissatisfied with the outcome, you may appeal to the Scottish Information Commissioner and request an investigation of your complaint. Your request to the Scottish Information Commissioner should be in writing (or other permanent form), stating your name and an address for correspondence. You should provide the details of the request and your reasons for dissatisfaction with both the original response by NHS Borders and your reasons for dissatisfaction with the outcome of the internal review. Your application for an investigation by the Scottish Information Commissioner must be made within six months of your receipt of the response with which you are dissatisfied. The address for the Office of the Scottish Information Commissioner is, Office of the Scottish Information Commissioner, Kinburn Castle, Doubledykes Road, St Andrews, Fife.