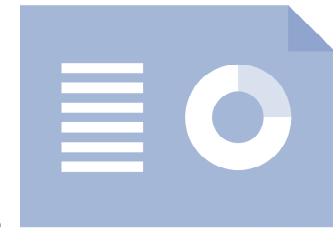


Gwynedd Council

Freedom of Information audit report

April 2025

Executive summary



Audit Methodology

The Information Commissioner is responsible for enforcing and promoting compliance with data protection legislation, as well as the Freedom of Information Act 2000 (FOIA) and Environmental Information Regulations (EIR). Section 47 of the FOIA provides provision for the Commissioner to assess whether a public authority is following good practice, including compliance with the requirements of this Act and the provisions of the codes of practice under sections 45 and 46.

The ICO is an independent, proportionate regulator and sees auditing as a constructive process with real benefits for public authorities and so aims to establish a participative approach. High standards of compliance with the relevant legislation can help public authorities to maintain the trust and confidence of the public.

Gwynedd Council (the Council) requested a consensual audit of its FOI practices. An introductory telephone meeting was held on 24 January 2025 with a representative of the Council to discuss the scope of the audit.

The purpose of the audit is to provide the Information Commissioner and the Council with an independent assurance of the extent to which the Council, within the scope of this agreed audit, is complying with FOIA and EIR requirements.

It was agreed that the audit would focus on the following area:

Scope area	Description
Freedom of Information (FOI)	The extent to which FOI/EIR accountability, policies and procedures, performance measurement controls, and reporting mechanisms to monitor compliance are in place and in operation throughout the public authority.

Audits are conducted following the Information Commissioner's audit methodology. The key elements of this are a desk-based review of selected policies and procedures, remote interviews with selected staff, and a virtual review of evidential documentation.

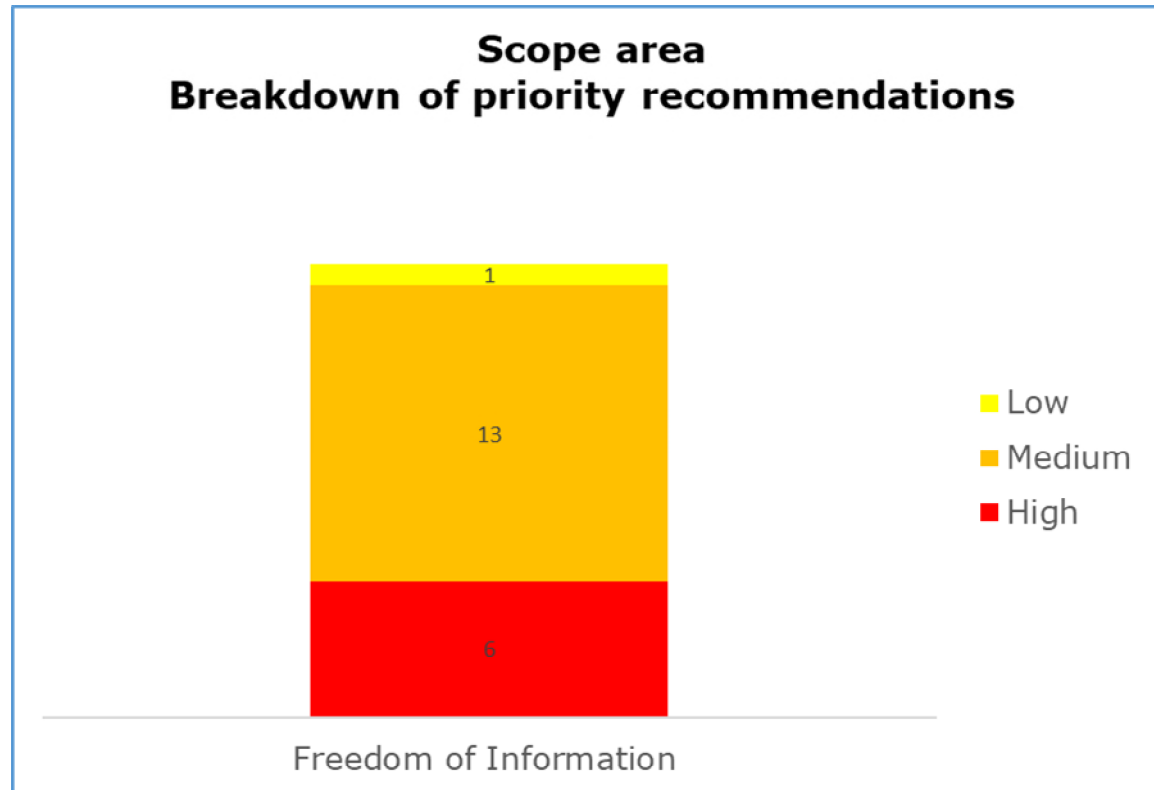
Where weaknesses were identified recommendations have been made, primarily around enhancing existing processes to facilitate compliance with the relevant legislation. In order to assist the Council in implementing the recommendations each has been assigned a priority rating based upon the risks that they are intended to address. The ratings are assigned based upon the ICO's assessment of the risks involved. the Council's priorities and risk appetite may vary and, therefore, they should undertake their own assessments of the risks identified.

Audit Summary

Audit Scope area	Assurance Rating	Overall Opinion
Freedom of Information (FOI)	REASONABLE	There is a reasonable level of assurance that processes and procedures are in place and are delivering FOI compliance. The audit has identified some scope for improvement in existing arrangements to reduce the risk of non-compliance with the FOIA.

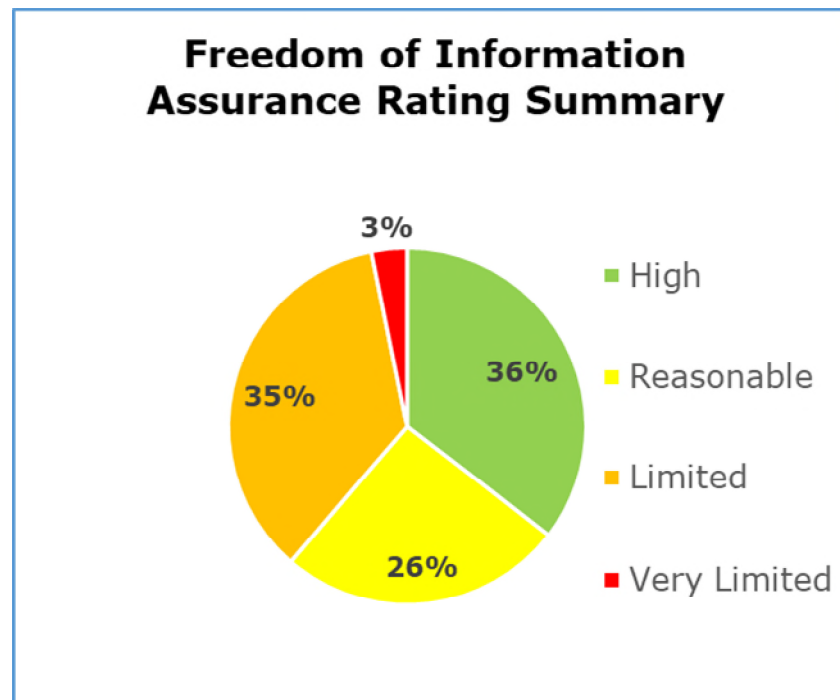
*The assurance ratings above are reflective of the remote audit methodology deployed and the rating may not necessarily represent a comprehensive assessment of compliance.

Priority Recommendations



The bar chart above shows a breakdown of the priorities assigned to our recommendations made as part of this audit. There are six high priority recommendations, 13 medium priority recommendations and one low priority recommendation.

Graphs and Charts



The pie chart above shows a summary of the assurance ratings awarded. 36% high assurance, 26% reasonable assurance, 35% limited assurance, 3% very limited assurance.

Key areas for improvement

We identified some key areas within our audit, where the Council needed to implement further measures to comply with the FOIA and EIR.

- The Council must ensure they continue to improve their FOI/EIR performance in order to comply with statutory timescales for responding to FOI/EIR requests.
- The Council should introduce mandatory FOI/EIR training for all staff across the Council, that is refreshed periodically. The training should be sufficiently detailed, so that staff have a clear understanding of how FOI/EIR applies to the Council and how to recognise an FOI/EIR request. Specialised FOI/EIR training should be provided for all staff with responsibility for handling FOI/EIR requests.
- In order to gain assurance on the quality of FOI/EIR responses being sent out, the Council should carry out formalised independent quality check dip sampling exercises on completed FOI/EIR requests.
- To help guarantee consistency, documented guidance should be introduced to support staff to accurately deal with hybrid requests which merge FOI/EIR requests with a Subject Access Request (SAR).

Key areas of assurance

At the time of the audit and based on the evidence seen by ICO auditors, measures were in place and implemented effectively to meet the control objectives in the following key areas.

- The Council's Information Governance (IG) team regularly provide advice and guidance on FOI/EIR matters to staff across the Council. Where support is required with an FOI/EIR response, they will often hold meetings to discuss any concerns.

- Guidance is available on the Council's website that supports individuals with how to request information under FOI/EIR.
- The Council maintains a documented record of their receipt and handling of requests. This enables them to monitor the request status from receipt through to completion.
- The Council have a number of FOI response templates in place to ensure that information provided when responding to requests meets statutory requirements.

Audit findings



Areas of non-conformance and recommendations

The table below details/detail the areas for improvement that were identified in the course of our audit; it includes recommendations for how those improvements might be achieved.

Freedom of Information			
Control measure	Non-conformity	Recommendation	Priority
Sufficient resources are assigned to the handling of requests for information to ensure response within the statutory timescales.	A.01. The Council have assigned responsibility for handling requests to staff across the Council. However, it was reported during interviews that staff with responsibility for responding to FOI/EIR requests do not always have sufficient time allocated to their FOI/EIR responsibilities. If there are insufficient resources, then the Council may fail to respond to requests within the statutory deadlines. This may breach section 10 of the FOIA or Regulation 5(2) of the EIR.	A.01. The Council should ensure that all staff with FOI/EIR responsibility have sufficient time allocated to their FOI/ EIR responsibilities. The Council should continue to complete periodic, documented reviews of staffing levels against workload and performance to statutory timescales. Where possible, there should be a documented facility to draw additional resource for time consuming or urgent requests, or in case of unusual volume. This will ensure that the Council is able to comply with statutory responsibilities.	Medium

Freedom of Information			
Control measure	Non-conformity	Recommendation	Priority
The public authority has an ICO approved publication scheme in place.	A.02.a. The Council have a publication scheme in place which is available on their website. The scheme sets out the Council's commitment to make certain classes of information routinely available, such as policies and procedures, minutes of meetings, annual reports and financial information. However, some staff with responsibility for handling requests are not aware of the information available through the publication scheme. If staff are not aware of the information published through the publication scheme, they may spend time collating information required for a response that is already published on the Council's website. A.02.b. In addition to the publication scheme, the Council have started to publish information through Open Data on their website. However, as this project is still in its infancy, only limited information has been published through Open Data. If the Council are not proactively making information available, this can lead to increased FOI/EIR requests.	A.02.a. The Council should ensure that staff with responsibility for handling FOI/EIR requests are aware of the information available through the publication scheme. This will help guarantee that staff are referring requestors to published information where information is already available through the scheme. A.02.b. The Council should continue to publish information through Open Data, receiving input from relevant staff about the data that would be most beneficial to proactively publish. This will support staff with FOI/EIR requests received.	Medium

Freedom of Information			
Control measure	Non-conformity	Recommendation	Priority
Policies and procedures are in place which explain the public authority's approach to, and responsibilities for, FOI and EIR regulations.	A.03.a. The Council have an FOI and EIR policy in place which explains their approach to, and responsibilities for FOI and EIR regulations. It was reported during interviews that this policy is to be reviewed every two years. The policy's version control information records that the policy was last reviewed in 2023, however it has only been reviewed three times since its implementation in 2005. A.03.b. The Council's FOI and EIR policies and procedures provide staff with contact details for the ICO, including the ICO's website. However, the website provided (ico.gov.uk) is incorrect. If policies are not reviewed in line with review dates the Council cannot be sure that they are up to date and fit for purpose.	A.03. The Council should ensure the FOI and EIR policy is reviewed periodically to guarantee that it remains up to date and fit for purpose. The Council could create a documented schedule of reviews for all their FOI/EIR policies and procedures to ensure they are all reviewed in line with review dates. A.03.b. The Council should ensure that all policies and procedures that include the ICO's contact details are amended to include the correct website, ico.org.uk, in order for staff to access further information if required.	Medium
Policies and procedures are easily accessible by staff.	A.04. The Council's FOI and EIR policies and procedures are made available on the intranet. However, the Council does not have processes in place to ensure all relevant staff have read and understood these policies and procedures. Some staff with responsibility for handling requests do not refer to these documents.	A.04. The Council should ensure that all relevant staff have read and understood the FOI and EIR policies and procedures. Policies and procedures should be made available in a non-electronic format for staff who do not have computer access. This will ensure that staff are aware of the	Medium

Freedom of Information			
Control measure	Non-conformity	Recommendation	Priority
	If staff do not access FOI/EIR policies and procedures then different staff may react to situations differently, resulting in, inconsistent, and potentially non-compliant actions being taken by the Council.	documented and standardised instructions available for them to follow.	
The public authority ensures that staff are informed of any changes to policies and procedures regarding FOI/EIR regulations.	A.05. When an FOI/EIR policy or procedure has been amended, it will show as red on each staff member's intranet site, turning green when they have read and accepted it. However, the Council do not proactively communicate changes to FOI/EIR policies and procedures. This means that where staff are not accessing the policy section of the intranet on a regular basis, they may not be aware of the policies or procedures that have been updated. If changes of policy are not communicated to staff, this may result in different staff processing requests in different ways, and may lead to non-compliance with statutory requirements.	A.05. The Council should ensure that any amendments to FOI/EIR policies and procedures are effectively communicated to staff through various methods, such as the intranet and email reminders. The Council should track whether or not staff have read and understood the revised policies or procedures. This will ensure that staff are not operating unaware of changed policies.	Medium

Freedom of Information			
Control measure	Non-conformity	Recommendation	Priority
Policies and procedures for FOI/EIR account for personal information and how it should be dealt with.	A.06. Although the Council have some FOI/EIR guidance that accounts for personal information and how it should be treated, it was identified during interviews that some staff are unaware of how to accurately deal with hybrid requests (FOI/EIR requests that merge with a SAR request). If staff are unaware of how to deal with hybrid requests, the Council may breach DP legislation with an unauthorised or inappropriate disclosure.	A.06. The Council must ensure that they have clear, documented guidance in place to support staff in accurately dealing with hybrid requests which merge FOI/EIR requests with a SAR. The guidance should outline the process to be followed to suitably redact personal data that is not to be disclosed as part of the FOI/EIR request. The guidance should also include the requirement to report potential Personal Data Breaches (PDB) that occur during the handling of an FOI or EIR request. This will ensure that FOI/EIR responses adhere to DP legislation.	High
The public authority ensures that FOI and EIR requests received are identified appropriately by its staff.	A.07. The majority of FOI and EIR requests received go to the FOI inbox. The Council's supporting officer in the corporate department has responsibility for triaging requests and ensuring that they are appropriately identified. They are then administered to an FOI coordinator in the department that is most likely to hold the information requested. However, there have been instances where staff may have received an FOI/EIR request directly to their inbox and dealt with it as business as usual, rather than under the appropriate regime, as they did not recognise it was an FOI/EIR request.	A.07. The Council must ensure that all staff are aware of the process in place to identify and differentiate between FOI, EIR and SAR requests, in order for these to be handled correctly under each individual regime. Staff in all departments should be aware of how to channel requests to the FOI inbox and the importance of deadlines. This will ensure that the Council is able to identify requests for both FOI and EIR requests in order to handle them according to relevant legislative requirements.	Medium

Freedom of Information			
Control measure	Non-conformity	Recommendation	Priority
	If staff do not recognise information requests appropriately, they may not be handled appropriately and responded to within statutory timeframes.		
The public authority has a process to identify and respond to vexatious, manifestly unreasonable and repeat requests.	A.08. Page three of the '<i>Operational guidance for dealing with requests</i>' document provides some information on vexatious and repeat requests. It records that "<i>if you think the request is vexatious, has been made before, or is part of a campaign, you should contact the Information Manager.</i>" However, it does not outline the process for dealing with such requests nor does it document any information about manifestly unreasonable requests under the EIR regime. It was reported during interviews that some staff dealing with FOI/EIR requests do not know how to identify vexatious, manifestly unreasonable and repeat requests. Without a documented process to identify and respond to such requests, refusals may be inconsistent risking non-compliance with legislative requirements. A failure to identify these requests may	A.08. The Council must ensure that their '<i>Operational guidance for dealing with requests</i>' and any other supporting FOI/EIR guidance includes detail on how to identify and respond to vexatious requests (S.14(1) FOIA), manifestly unreasonable requests (reg 12(4)(b) EIR) and repeat requests in line with the legislation. This process must be shared with staff responsible for handling FOI/EIR requests so that they are able to identify and respond, if necessary, to such requests appropriately and in line with legislative requirements. Guidance on vexatious requests, manifestly unreasonable requests and repeat requests can be found on the ICO website.	Medium

Freedom of Information			
Control measure	Non-conformity	Recommendation	Priority
	also affect The Councils capacity to meet the statutory deadlines.		
There are mechanisms to monitor the quality of responses to requests.	A.09. ICO auditors did not gain assurance that independent quality check dip sampling exercises are carried out periodically on completed requests across the Council. This means that the Council are not provided with a high level overview of the quality of FOI/EIR responses in all areas, so they cannot provide assurance that the quality of responses are consistent across the Council. If there is no monitoring, the Council may not be aware if it is responding to requests appropriately, which may result in statutory non-compliance.	A.09. The Council should ensure that independent quality check dip sampling exercises are carried out on completed requests. These checks should be formalised and completed periodically by appropriate staff, such as the Information Governance (IG) team, in order to gain assurance on the quality of responses being sent out across the Council. Issues with response quality identified during these checks should be fed back to relevant staff, who are then re-trained where necessary. This will help guarantee that the Council's responses to requests are appropriate and thorough.	Medium
The public authority is complying with statutory timescales for FOI/EIR regulations.	A.10. The Council are taking steps to improve their FOI/EIR compliance with statutory timescales, such as creating regular reports to highlight departments that are not meeting response deadlines. However, figures provided by the Council show that the Council's average compliance rate for April 2024-March 2025 was 75.5%, well under the ICO's expected 95% compliance rate.	A.10. The Council should continue with their plans to improve their FOI/ EIR compliance across the Council. Where a department is routinely not complying with statutory timescales, action should be taken to assist this department in improving its compliance. In addition to this, the Council should ensure that FOI/EIR is considered from	High

Freedom of Information			
Control measure	Non-conformity	Recommendation	Priority
	If timescales are not met, the council risks non-compliance with statutory requirements.	the outset where new policy initiatives are to be introduced or where significant events can be anticipated. In these cases, the Council should put a plan in place to proactively publish relevant information. This will help ensure that the Council is complying with statutory requirements.	
Internal review procedures comply with the relevant Codes of Practice and ensure that timely responses are provided to complaints.	A.11. The Council have an internal review procedure in place, recording that the monitoring officer is responsible for conducting internal reviews. In addition to this, their template response letters provide requesters with detail of how to request an internal review if they are dissatisfied with the response received. Although responsibility for conducting reviews has been assigned, internal reviews are not always completed within the statutory timeframe of 20 working days. Where internal reviews are not responded to in the statutory timeframe, the Council may fail to resolve complaints effectively and may find itself subject to a greater number of complaints to the ICO.	A.11. The Council must ensure that all internal reviews are completed within the statutory timeframe and responses to complaints are provided in a timely manner. This will ensure that the Council adheres to its obligations in handling complaints properly as per section 45 Codes of Practice (CoP) on request handling, section 46 CoP on records management practice and section 16 CoP on the duty to provide advice and assistance.	Medium
Exemptions/Exceptions should be applied on a case-by-case basis, by	A.12.a. It was reported during interviews that there is limited awareness across the Council about exemptions (FOI) and	A.12.a. The Council must ensure that staff with responsibility for handling FOI/EIR requests have a clear understanding of	High

Freedom of Information			
Control measure	Non-conformity	Recommendation	Priority
appropriately trained staff, with no evidence of the use of blanket exemptions/exceptions.	exceptions (EIR). Staff with responsibility for responding to requests may be aware of when an exemption/exception may need to be applied but are unable to identify the most appropriate one. Although there is some documented guidance in place, staff do not refer to this regularly. A.12.b. The Council's '<i>Environmental Information Regulations</i>' (<i>Rheoliadau Gwybodaeth Amgylcheddol</i>) document inaccurately refers to DPA98 rather than DPA18. In addition to this, the '<i>FOI flow chart</i>' inaccurately refers to FOI <u>exceptions</u> rather than FOI exemptions. A.12.c. Some staff with responsibility for handling FOI/EIR requests have not been trained on exemptions/ exceptions. If untrained staff are responsible for applying exemptions/exceptions, then the Council risks that they will be applied incorrectly, or not applied at all.	exemptions/exceptions and are applying them on a case by case basis, including where applicable, the application of the public interest test. A.12.b. The Council must ensure that all their exemptions and exceptions guidance is reviewed and updated to ensure it is up to date and fit for purpose. It should accurately reflect exemptions for FOI and exceptions for EIR. A.12.c. All staff with responsibility for handling FOI/EIR requests should be sufficiently trained in the use of exemptions and exceptions. This will provide the Council with assurance that blanket rules are not being applied for exemptions/exceptions, and that those in charge of applying them have been properly trained to do so. Please find further guidance on exemptions, exceptions and public interest test on the ICO website.	

Freedom of Information			
Control measure	Non-conformity	Recommendation	Priority
There is evidence of an oversight or approval process for the use of exemptions/exceptions.	A.13. The IG officer and Senior Statutory Data Protection Officer (SSDPO) are often consulted on draft responses where an exemption/exception has been applied. In addition to this, some responses where exemptions/exceptions have been applied are reviewed by management before responses are provided to requesters. However, this is done on an ad-hoc basis, as the Council do not have a documented process in place to ensure management oversight and approval is obtained, where applicable, for the application of exemptions/exceptions. Where there is no oversight or approval process, the Council may be misapplying exemptions or exceptions.	A.13. The Council should create a documented process that outlines which exemptions/exceptions should be subject to management oversight and approval, where applicable, before a response is sent out. Once the process is created, the Council must ensure that all staff with responsibility for handling requests and decision makers are made aware of it. The guidance should record the requirement for quality check dip sampling on applied exemptions/exceptions to ensure that they have been applied correctly. This will ensure that the Council's use of exemptions or exceptions is subject to a proper documented approval process, and not down to just the judgement of a single individual.	Medium

Freedom of Information			
Control measure	Non-conformity	Recommendation	Priority
Redactions should be applied on a case-by-case basis, by appropriately trained staff, and records should be maintained of what has been redacted.	A.14. The Council have redaction guidance in place to help staff understand the redaction process and how to use the redaction tool. The IG officer also provides advice to staff on redactions where required. In addition, the supporting officer often checks draft response to ensure they have been redacted correctly. However, staff do not undergo regular training on what to redact, and how to redact it. If redactions are improperly applied then the Council may accidentally disclose information that should remain secret.	A.14. Staff with responsibility for responding to FOI/EIR requests should undergo regular training on what to redact, and how to redact it. This will help the Council ensure that staff are appropriately trained and only the necessary information is redacted.	Medium
There is evidence of an oversight or approval process for the use of redactions.	A.15. The ICO acknowledges that the IG officer often discusses draft responses where redactions have been applied with staff and may sometimes redact the information on their behalf. However, similarly to A.13, the Council's approval process for the use of redactions is not documented. In instances where there is no oversight or approval process, redactions may be improperly applied and the Council may accidentally disclose information that should remain secret.	A.15. The Council should ensure that the approval process for the use of redactions is documented. This additional guidance could be added to the redaction guidance document the Council has in place. The guidance should record when redactions should be subject to authorisation by senior team members or managers, for instance with staff that are yet to receive specialised training. Mechanisms should also be put in place for senior staff to authorise experienced operational staff, that have received appropriate training, to work without	Medium

Freedom of Information			
Control measure	Non-conformity	Recommendation	Priority
		supervision or monitoring of their use of redactions. Redactions should be subject to quality check dip sampling to ensure that all appropriate information was redacted and that redactions were not applied incorrectly. This will help provide the Council with assurance that where redactions are applied, they are done so properly and subject to review and authorisation.	
There is an induction training programme, with input from Information Governance or equivalent, which includes general training on how FOI/EIR applies to the public authority, what they currently do to comply, and how to recognise an FOI/EIR request.	A.16. New starters are provided with an FOI new staff pamphlet at induction stage. The document provides staff with a high level overview of FOI. In addition to this, new starters have access to the FOI and EIR policies and procedures the Council has in place. However, the Council's induction training programme does not include formalised FOI training on how FOI/EIR applies to the Council, what the Council currently do to comply and how to recognise an FOI/EIR request. If staff do not receive induction FOI/EIR training, the Council have not controlled the risk of them acting in non-compliance with legislative requirements.	A.16. The Council must ensure that their induction programme is reviewed and updated to provide all new employees with an understanding of FOI and EIR. The training should include sufficient detail on how FOI/EIR applies to the Council, what they currently do to comply and how to recognise an FOI/EIR request. This training must be mandatory for all new employees. This will guarantee that new starters have the necessary knowledge to ensure the Council complies with legislative requirements.	High

Freedom of Information			
Control measure	Non-conformity	Recommendation	Priority
Staff receive refresher training in the requirements of FOI/EIR, including, where appropriate, updates from the relevant decisions of the ICO and the Information Tribunal.	A.17. Currently the Council do not have formalised FOI/EIR training in place for all staff, that is refreshed periodically. It was highlighted during interviews that some staff do not recall the last time they received any FOI/EIR training. However, the ICO acknowledges that the IG team provide informal training to staff but this is not documented. Without refresher training, there is a risk that staff knowledge will become out of date or forgotten and result in a breach of legislation.	A.17. The Council must ensure that all employees receive refresher training covering FOI/EIR. Refresher training should be reviewed periodically and updated where required for comprehensiveness and accuracy. The Council should track completion rates for refresher training for all staff to ensure that they are able to identify staff that are not completing refresher training on a regular basis. The training content should include, where appropriate, updates from the relevant decisions of the ICO and the Information Tribunal. This will ensure that all staff receive appropriate and timely refresher training.	High
There is specific training for staff with responsibility for handling requests for information, on FOI, EIR and Codes of Practice.	A.18. Some staff have received specific FOI/EIR training, for instance some FOI coordinators and managers attended the workshops delivered by the IG team in 2023 and 2024. However, other staff with responsibility for handling FOI/EIR requests, have not received any specialised training. If staff do not have the necessary skills to handle specialist tasks, the Council may	A.18. The Council should review and update their specialised FOI/EIR training to ensure that it contains all necessary information needed by staff that have responsibility for responding to FOI/EIR requests. Once reviewed, this training should be completed by all staff with responsibility for handling FOI/EIR requests. The training must be mandatory and should be refreshed on an appropriate periodic basis by relevant staff.	Medium

Freedom of Information			
Control measure	Non-conformity	Recommendation	Priority
	find themselves acting without compliance.	This will ensure that staff who have specific responsibilities have suitable training to provide them with the necessary skills.	
Records are maintained, either centrally or by local management, of the FOI/EIR training received by staff. These records are monitored to ensure that all staff receive or attend all relevant training.	A.19. Currently, the Council do not keep a centralised record of the FOI/EIR training that staff have completed. If the Council cannot demonstrate that they have provided training, they have no assurance that comprehensive training has been carried out. They will be unable to carry out checks, reviews, or monitoring of completion rates.	A.19. The Council must ensure that they keep a centralised record of all FOI/EIR training that has been completed by staff. This includes induction, refresher and specialised training. Senior management should review training completion percentages to ensure that suitable minimum levels are maintained. This will ensure that the Council can demonstrate they have provided training to their staff.	High
Staff receive regular reminders of how to recognise FOI/EIR requests.	A.20. Although the Council do periodically send out reminders about FOI/EIR, using communication methods such as newsletters and bulletins, it was highlighted during interviews that more regular reminders of how to recognise FOI/EIR requests would be beneficial for staff. If staff do not recognise requests, they may not inform the Council that the request has been submitted, which may prevent it from being responded to within	A.20. The Council should send out regular communications such as emails or newsletters that remind staff of how to recognise and react to FOI/EIR requests. Ongoing reminders such as posters or screensavers should be in use around the Council's premises, where possible, to remind staff of how to recognise and react to FOI/EIR requests. This will help the Council ensure that they do not fail to comply with legislation by not responding to a request.	Low

Freedom of Information			
Control measure	Non-conformity	Recommendation	Priority
	the statutory timescale.		

Appendices



Appendix One – Recommendation Priority Ratings Descriptions

Urgent Priority Recommendations

These recommendations are intended to address risks which represent clear and immediate risks to the data controller's ability to comply with the requirements of data protection legislation.

High Priority Recommendations

These recommendations address risks which should be tackled at the earliest opportunity to mitigate the chances of a breach of data protection legislation.

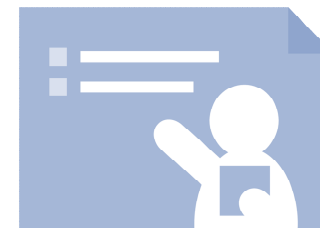
Medium Priority Recommendations

These recommendations address medium level risks which can be tackled over a longer timeframe or where some mitigating controls are already in place, but could be enhanced.

Low Priority Recommendations

These recommendations represent enhancements to existing controls to ensure low level risks are fully mitigated or where we are recommending that the data controller sees existing plans through to completion.

Credits



ICO Audit Team

ICO Team Manager – David Guppy

ICO Engagement Lead Auditor – Luwi Mahenga

Thanks

The ICO would like to thank Helen Parry, Statutory Senior Data Protection Officer for their help in the audit engagement.

Distribution List

This report is for the attention of Helen Parry, Statutory Senior Data Protection Officer and Ian Jones, Head of Corporate Services and Senior Information Risk Owner (SIRO).

Disclaimer

The matters arising in this report are only those that came to our attention during the course of the audit and are not necessarily a comprehensive statement of all the areas requiring improvement.

The responsibility for ensuring that there are adequate risk management, governance and internal control arrangements in place rest with the management of Gwynedd Council.

We take all reasonable care to ensure that our audit report is fair and accurate but cannot accept any liability to any person or organisation, including any third party, for any loss or damage suffered or costs incurred by it arising out of, or in connection with, the use of this report, however such loss or damage is caused. We cannot accept liability for loss occasioned to any person or organisation, including any third party, acting or refraining from acting as a result of any information contained in this report.

This report is an exception report and is solely for the use of Gwynedd Council. The scope areas and controls covered by the audit have been tailored to Gwynedd Council and, as a result, the audit report is not intended to be used in comparison with other ICO audit reports.