

## **EAST DEVON DISTRICT COUNCIL**

### **Minutes of the meeting of Information Governance Board held at Council Chamber, Blackdown House, Honiton on 25 February 2026**

#### **Attendance list at end of document**

The meeting started at 10.00 am and ended at 11.28 am

#### **7 Minutes of the previous meeting**

The minutes of the previous meeting were agreed.

#### **8 Declarations**

None.

#### **9 Data breach and cyber security verbal update**

The Board received an update on the work of the Strata team in relation to cyber security. Typically work currently centred around “distributed denial services” and there were considerable benefits of geoblocks that prevented access to or emails from overseas. The Strata team also link up with shared learning from other local authorities that provides intelligence on threats faced by other councils nationally.

Employees were good at reporting emails that did get through security measures and work continues in running exercises to help train staff to spot suspicious emails.

The three authorities covered by Strata were also held as exemplar authorities due to the implementation of the Cyber Assessment Framework (CAF). This framework had released a degree of government funding, but because the three authorities were classed as “low risk” this had not delivered any substantial funding.

The Board discussed raising awareness with Councillors.

#### **AGREED**

- 1. To implement measures to raise awareness with Councillors, including both general training and the offer of more specific discussion for the relevant Portfolio Holders (Cllrs Loudoun and Jackson) and the Audit and Governance Committee on cyber threats faced;**
- 2. To put the minutes of the Information Governance Board to the Audit and Governance Committee for information.**

#### **10 Transparency Protocol**

The Transparency Code requires councils to regularly publish datasets such as grants and expenditure over £500, purchase orders over £5,000, asset details, procurement information, payment performance, car parking data, HRA stock value, organisational structure, and senior salaries.

An internal audit found several datasets were out of date and that responsibilities for maintaining them were unclear. Without clear ownership and update schedules, the council risked non-compliance.

**AGREED To approve the Protocol which assigned responsibilities and set a new publication timetable for all transparency datasets. The updating of data sets in the protocol would be complete by October 2026.**

11 **Complaints Policy**

The Board had no specific remit for the review of the Complaints Policy but their views were sought on the review of the existing policy. The Director of Governance had delegated authority to approve the updated policy.

The Board therefore noted the updated policy.

12 **Data Protection Policy**

The Data Protection Policy had been updated to clarify aspects of the policy for ease of understanding by both employees and the public. The policy would be circulated to the Board for any further comment before agreement on the updated version by the Director of Governance under delegated authority.

13 **Data Protection Impact Assessment Policy**

The Data Protection Impact Assessment Policy had been reviewed to simplify, clarify and improve ease of use for employees. It was essential that undertaking a DPIA became an integral part of setting up any new personal data processing. The Digital Team and Strata were working with employees and the DP Officer on undertaking these assessments. This included “Fabric”, a data lake that potentially could be mined for data to provide a business benefit, and therefore careful consideration of the consequences of mined data, including if it could lead to individual identification, was important.

**AGREED that the Data Protection Impact Assessment Policy be approved**, by the Director of Governance under delegated authority.

14 **Subject Access Request Policy**

The current Subject Access Request Policy had been updated to clarify definitions and make the policy easier to understand for public use.

Discussion took place on the practicalities of confirmation of parental or guardian access in relation to a SAR on an individual under age 18. Some amended wording was also suggested in relation to the Fees section. The Board were informed of the timeframe element for compliance with a SAR including internal timeframe for collating the documentation.

**AGREED that the Subject Access Request Policy be approved** (subject to minor wording amendments) by the Director of Governance under delegated authority.

15 **FOI and DPA update February 2026**

During the third quarter of 2025/26 (September – end January), the council received 254 requests for information under the Freedom of Information Act/Environmental Information Regulations; 20 Subject Access requests (compared to 9 in the last quarter) were made in the same quarter.

There were 20 suspected Personal Data breaches reported to the DPO in the same period, the majority of which were emails sent to wrong recipients. None of the breaches required notification to the Information Commissioner's Office.

The Board were reminded of continued work in the publication of requests made under FOI and EIR online; any request made for previously published information could qualify for an exemption to comply with the request. Published requests could be found online at [Freedom of Information published requests - East Devon](#)

Discussions are taking place with the Learning and Development team regarding provision of a filmed short presentation to be published on the intranet for employees. The Board felt that a version for Councillors would also be helpful.

The Board noted the report and the forward plan.

**Attendance List**

**Councillors present:**

C Burhop  
J Loudoun

**Officers in attendance:**

Melanie Wellman, Director Governance (Chair)  
Robin Barlow, Compliance and Security Manager - Strata  
Teresa Gudge, Information Governance Manager and Data Protection Officer  
Debbie Meakin, Democratic Services

Chair .....

Date: .....