

Email received: 16/03/23 from [REDACTED], subject line - Z7182666:

External: This email originated outside the ICO.
FAO Mel,

Mel – thanks so much for taking my phone-call this morning.

In relation to our registration ICO Z7182666, can I please request the following changes:

1. As a public sector body (NDPB in Northern Ireland), we are required to have a DPO, so please now update the blank details to read:

DPO:

[REDACTED]

GTCNI

Albany House

73-75 [Great Victoria Street](#)

[Belfast, BT2 7AF](#)

E: foi@gtcni.org.uk

T: 028 90333390

2. Main Contact:

Replace [REDACTED] with [REDACTED]

3. As [REDACTED] from GTCNI, the security code originally issued to [REDACTED] is unavailable, so could I please ask you to send another security code so that I may maintain our records online going forward.

Kind Regards

[REDACTED]

[REDACTED]

General Teaching Council for Northern Ireland

Albany House

73-75 [Great Victoria Street](#)

[Belfast, BT2 7AF](#)

E: [REDACTED]@gtcni.org.uk

T: [REDACTED]

Email received 19/04/2023 from [REDACTED], subject line - RE:ICO – Renewal Confirmation..:

External: This email originated outside the ICO.
Hi there,

[REDACTED] no longer works for GTCNI and we don't know the security number to access the online portal, can you please email this to me or alternately amend your records accordingly to the below?

I will still need a new security code, I look forward to hearing back from you in due course

[REDACTED]
[REDACTED]@gtcni.org.uk

Many thanks in advance

[REDACTED]

[REDACTED]

**Email sent to [REDACTED] 25/04/23, subject line – RE:
Z7182666 MEL ICO:02080002442 and reply to Mel's query:**

External: This email originated outside the ICO.
Responses as below:

registration reference number - ICO Z7182666

DPO is an individual. Details as follows:

DPO:

[REDACTED]

GTCNI

Albany House

73-75 [Great Victoria Street](#)

[Belfast, BT2 7AF](#)

E: foi@gtcni.org.uk

T: 028 90333390

GTCNI is required to have a DPO.

Kind Regards

[REDACTED]

[REDACTED]

General Teaching Council for Northern Ireland

Albany House

73-75 [Great Victoria Street](#)

[Belfast, BT2 7AF](#)

E: [REDACTED]@[gtcni.org.uk](mailto:foi@gtcni.org.uk)

T: [REDACTED]

Email

RE: ICO Case Reference: IC-213214-D7P0

Email

From: 

To:  ICO Casework

Cc:

Subject: RE: ICO Case Reference: IC-213214-D7P0

Display Name

Date Received: 01/02/2023 09:04

Email Address: @gtcni.org.uk

External: This email originated outside the ICO.
Hello Caroline,

Thank you for this information.

My interpretation is that the phrases referring to adequate and necessary funding includes remuneration for the role and that an organisation would not meeting this requirement if they asked an employee to take on these tasks without fair and adequate remuneration. As this legislation is relatively new and it continues to be fleshed out, I am sure this specific issue will be addressed at some point with legal precedent.

I appreciate the time you put in to review this issue for me.


Many thanks,




General Teaching Council for Northern Ireland
Albany House
73-75 Great Victoria Street
Belfast, BT2 7AF
E: @gtcni.org.uk
T: 
M: 
www.gtcni.org.uk
twitter.com/GTCNI

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From: icocasework <icocasework@ico.org.uk>
Sent: 31 January 2023 20:11
To: @gtcni.org.uk
Subject: ICO Case Reference: IC-213214-D7P0

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Please ensure you can verify the sender's name and email address.
Treat all attachments and links with caution.
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31 January 2023

Our reference: IC-213214-D7P0

Dear [REDACTED]

Further to our livechat yesterday, I am writing to provide the links for the ICO's [DPO guidance](#) and that of the EDPB guidance.

As far as I can see, neither the legislation nor the guidance directly address the issue of the remuneration of a Data Protection Officer though it is stated that organisations are expected to provide adequate resources (sufficient time, financial, infrastructure, and, where appropriate, staff) to enable the DPO to meet their UK GDPR obligations, and to maintain their expert level of knowledge.

The focus is on the professional qualities which a DPO needs including an expert knowledge of data protection law and practices and the ability to fulfil the tasks referred to. As I indicated on livechat, as the role of DPO carries a high level of responsibility with the post holder reporting directly to executive management, I would assume any organisation employing one would wish to provide remuneration in line with this in order to secure someone with the relevant qualities.

I hope this information is helpful to you. If you would like to discuss this enquiry further, please contact me on my direct number 0330 4146534. If you need advice on a new issue you can [contact us](#) via our Helpline on 0303 123 1113 or through our live chat service. In addition, more information about the Information Commissioner's Office and the legislation we oversee is available on our website at www.ico.org.uk. For information about what we do with personal data see our [privacy notice](#).


Yours sincerely


Caroline Thompson
Case Officer
Information Commissioner's Office

Email

FW: DPO Query IC-246756-B0P8

Email

From  NI.ExternalEmailAccount@ico.org.uk

To  ICO Casework

Cc

Subject FW: DPO Query IC-246756-B0P8

Display Name

Date Received 24/07/2023 11:18

Email Address NI External Email Account NI.ExternalEmailAccount@ico.org.uk

From: [REDACTED]@gtcni.org.uk>
Sent: Wednesday, July 5, 2023 1:03 PM
To: NI External Email Account <NI.ExternalEmailAccount@ico.org.uk>
Cc: [REDACTED]@gtcni.org.uk>
Subject: RE: DPO Query

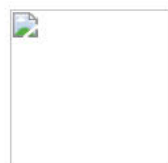
External: This email originated outside the ICO.
Paul,

Many thanks for taking the time to respond to me.

Like yourselves, we are a smaller organisation, so have ordinarily embedded DP functions into our Information Governance Lead role. With that role now temporarily vacant, we simply needed to ensure that DP responsibilities continue and that our staff are aware of who to report to under our current procedures in the event of a data breach. We are seeking to recruit into the vacancy, so this is a temporary measure.

Kind Regards

[REDACTED]
[REDACTED]



General Teaching Council for Northern Ireland
Albany House
[73-75 Great Victoria Street](#)
[Belfast BT2 7AE](#)
E: [REDACTED]@gtcni.org.uk
T: [REDACTED]

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From: NI External Email Account <NI.ExternalEmailAccount@ico.org.uk>
Sent: 05 July 2023 12:57
To: [REDACTED]@gtcni.org.uk>
Subject: RE: DPO Query

Caution – This email has been received from outside the NICS network.

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FOR INTERNAL NICS STAFF ONLY - If you have any concerns regarding the email please forward to [REDACTED]

Hi [REDACTED]

Thank you for your recent email regarding Data Protection Officers.

Our DPO guidance states that, as long as the professional duties of the employee are compatible with the duties of the DPO and do not lead to a conflict of interests, you can appoint an existing employee as your DPO, rather than you having to create a new post.

Your DPO should hold a senior role in the organisation, reporting to the highest level of management. They cannot however hold a position within your organisation that leads him or her to determine the purposes and the means of the processing of personal data. At the same time, the DPO shouldn't be expected to manage competing objectives that could result in data protection taking a secondary role to business interests.

[Data protection officers | ICO](#)

I hope this helps.

Kind regards,

Paul



Paul Murphy
Support Officer (Northern Ireland)

Information Commissioner's Office, 3rd Floor,
14 Cromac Place, Ormeau Road, Belfast BT7 2JB
0330 313 1907

ico.org.uk twitter.com/iconews

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For information about what we do with personal data see our [privacy notice](#).

From: [REDACTED] <[\[REDACTED\]@gtcni.org.uk](mailto:[REDACTED]@gtcni.org.uk)>

Sent: Monday, July 3, 2023 9:29 AM

To: NI External Email Account <NI.ExternalEmailAccount@ico.org.uk>

Subject: DPO Query

External: This email originated outside the ICO.

Hoping you can give us some advice please.

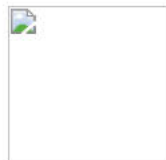
Our DPO role is currently vacant due to a leaver, [REDACTED]. Unfortunately, as an NDPB, we have to ensure we have business case approvals in place in order to appoint staff. We now have this in place and have been actively looking to recruit, albeit, we have experienced some difficulties in obtaining a new DPO with the appropriate skills / background. We are a very small organisation (only 16 people) and do not have a body of skilled individuals in-house to draw upon as a back-up, as such, in order not to leave the requirement to have a named contact in place, we have temporarily offered the name of our Head of Corporate Services as a contact point for FoIA.

Can you let us know if this is acceptable in the short term? If it is not, we will amend our records with you.

Kind Regards

[REDACTED]

[REDACTED]



General Teaching Council for Northern Ireland

Albany House

[73-75 Great Victoria Street](#)

[Belfast BT2 7AF](#)

E: [REDACTED] <[\[REDACTED\]@gtcni.org.uk](mailto:[REDACTED]@gtcni.org.uk)>

T: [REDACTED]

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