

Date 22/05/2025  
Your Ref  
Our Ref 10063

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Dear

## FREEDOM OF INFORMATION – DATA PROTECTION

I write in response to your request for information in relation to Data Protection.

Question:

Under the Freedom of Information Act 2000, please provide the following information about your procurement of any

- (i) external Data Protection Officer (DPO),
- (ii) Data protection GDPR compliance services for the period FY2022-23 to FY2024-25:

1. Current DPO arrangements

1.1 Is the organisation's DPO and other staff that work on data protection compliance:

- (a) An internal employee

Answer:

Yes

Question:

- (b) A DPO provided by an external service provider
- (c) Hybrid (internal staff with external service provider support)

Answer:

No - Not applicable

Question:

1.2 Where services are provided by external providers, please share the following information:

- (a) The Company name(s)
- (b) Annual spend by your organisation (FY2022/2023 through to FY2024/2025)
- (c) The highest day rate paid
- (d) Contract dates (start/end/renewal terms)
- (e) A brief description of the project or services provided (for instance, project title or internal

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Chair Professor John Connaghan CBE  
Chief Executive Professor Caroline Hiscox  
*Lothian NHS Board is the common  
name of Lothian Health Board*

reference)

(f) Services covered (e.g., audits, breach management, SAR management, delivery of DPIAs)

- Please indicate what deliverables were produced
- Procurement method (e.g., open competition, framework agreement, direct award) and name of the procurement framework, if applicable.

Answer:

Not applicable

Question:

## 2. Consultancy Spend

2.1 What is the organisation's, total annual expenditure on data protection/GDPR consultancy services?

2.2 For SoW/projects which have a spend of more than £5k), please share the following information:

- Supplier company name
- The scope of the Project (e.g., "ICO investigation support", DPIA support, Internal Audit recommendation support)
- Spend
- Procurement method

Answer:

Not applicable

Question:

## 3. Data Protection Compliance staffing

3.1 The Number of in-house data protection staff in the organisation? (FTE)

Answer:

Not applicable

3.1 - 9

Question:

3.2 Are there any vacant roles? (Yes/No)

Answer:

No

Question:

3.3 Where there any ICO investigations, audits, or enforcement actions for the period from FY2022/2023 to FY 2024/2025?

Answer:

No

Question:

4. Future Plans

Answer:

Not applicable

Question:

4.1 Is your organisation planning to put out to tender for any DPO/GDPR services in the current financial year?

Answer:

No

Question:

4.2 If yes please provide the following:

Expected timeline

Budget range

Key service requirements

Procurement method

Answer:

Not applicable

I hope the information provided helps with your request.

If you are unhappy with our response to your request, you do have the right to request us to review it. Your request should be made within 40 working days of receipt of this letter, and we will reply within 20 working days of receipt. If our decision is unchanged following a review and you remain dissatisfied with this, you then have the right to make a formal complaint to the Scottish Information Commissioner within 6 months of receipt of our review response. You can do this by using the Scottish Information Commissioner's Office online appeals service at [www.itspublicknowledge.info/Appeal](http://www.itspublicknowledge.info/Appeal). If you remain dissatisfied with the Commissioner's response you then have the option to appeal to the Court of Session on a point of law.

If you require a review of our decision to be carried out, please write to the FOI Reviewer at the email address at the head of this letter. The review will be undertaken by a Reviewer who was not involved in the original decision-making process.

FOI responses (subject to redaction of personal information) may appear on NHS Lothian's Freedom of Information website at: <https://org.nhsllothian.scot/FOI/Pages/default.aspx>

Yours sincerely

**ALISON MACDONALD**  
**Executive Director, Nursing**  
Cc: Chief Executive