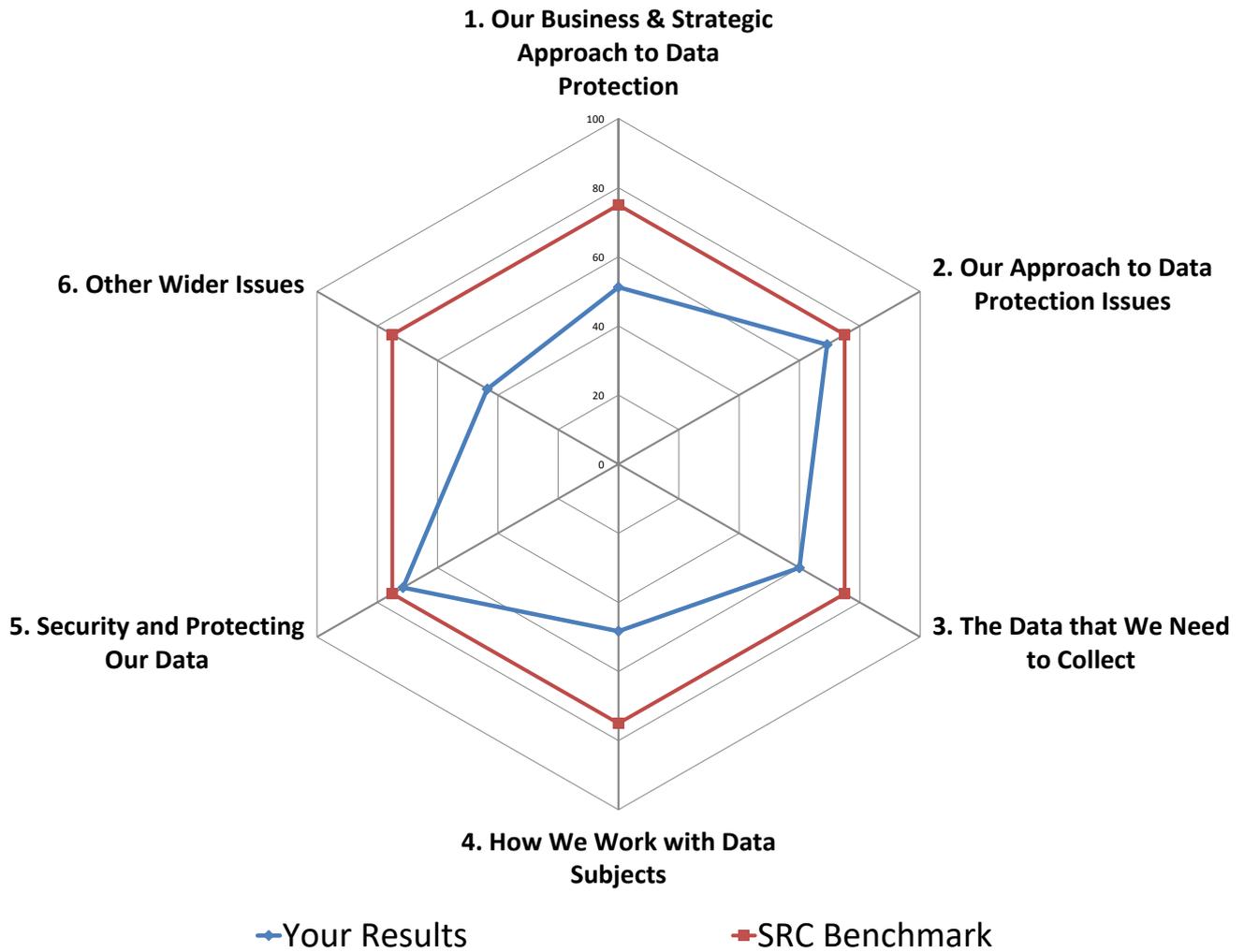


A	1. Our Business & Strategic Approach to Data Protection	51	Our organisation has a sound understanding of the concept of personal data and its lawfulness, the issues of privacy and the risks of personal identification, which are firmly embedded throughout our organisation.	54
			Our organisation has a clear understanding of the legal basis under which we process personal data safely, and we are confident we are processing such data lawfully.	51
			Our organisation has in place policies, procedures and roles to ensure that we meet all our data protection responsibilities and we are confident these are firmly embedded.	44
			As an organisation we have taken appropriate steps to ensure that our decision makers and key personnel are aware of their data protection responsibilities	56
B	2. Our Approach to Data Protection Issues	69	We have a clear understanding how the processing of personal data is essential to the success of our organisation, and we have in place robust processes to handle that data safely via automated and/or manual systems.	75
			We have a clear policy on where responsibility lies throughout our organisation for the processing of personal data.	70
			We are confident that our business obtains consent to process personal data in way that is clear to all, and we are equally clear about how to withdraw that consent at any time.	56
			While as an organisation we are confident of our internal systems and expertise we know how to gain access to professional support as and when needed.	75
C	3. The Data that We Need to Collect	60	We are confident that as an organisation we collect the minimum amount of personal data to meet our purpose, and that we retain that data for no longer than needed.	60
			Within our organisation we have a very clear picture based upon our records of what data we collect and why, which we review on a regular basis to ensure a continuing need.	78
			As an organisation we understand and have in place robust policies and procedures to send personal data to third parties and in turn to act as a third party to another organisation.	56
			There is within our organisation, or we have ready access to, a depth of knowledge so that we know how to deal with broader issues such as, for example, the anonymisation of data, big data and the range of exemptions that might apply to us.	47
D	4. How We Work with Data Subjects	48	As an organisation we have a clear understanding of the rights of data subjects and we have in place proportionate policies and procedures to deal with any requests from data subjects to have access to any personal data we might hold concerning them.	38
			Our organisation is confident that it would recognise and subsequently handle correctly and sensitively any request from a data subject for access to the personal data we hold on them.	45
			We have within our organisation the facilities and understanding to respond to objections from data subjects to the processing of their personal data or asking for possible inaccuracies to be amended.	48
			While as an organisation we understand the difficulties, especially via on line sources, of ensuring we correctly identify personal data collected on children and vulnerable people and then act appropriately, we do have in place practical precautions to ensure we act reasonably and responsibly.	64
E	5. Security and Protecting Our Data	71	As a responsible organisation we take very seriously our obligations to ensure that the personal data we hold is kept securely, and we have in place policies to deal with any potential breach.	80
			We are confident that our IT security systems remain fit for purpose and provide the organisation with an appropriate level of security.	80
			Our organisation has a culture that takes data and IT security very serious, and we are confident that our people would escalate data and IT concerns swiftly.	78
			We are confident that we have within our organisation the policies and procedures to detect, report, investigate and resolve satisfactorily a data breach.	48
F	6. Other Wider Issues	44	As an organisation we understand within the context of current organisation model the issues around the flow of personal data between different countries.	23
			Our business is sufficiently aware of the special rules that apply to e-mail and telephone marketing etc, and we apply those rules rigorously.	62
			We recognise as an organisation that there are what you might call specialist categories of personal data including employment, medical, statistical and financial, and we know how to handle such specialisms as they apply within our organisation.	62
			We are confident that our organisation is aware of the forthcoming data protection changes known as GDPR, and we have robust plans in place ensure sure compliance in good time for their introduction.	31

Initial Findings



Action:

Action:

Action:

Action: