



22nd February 2018

Freedom of Information Request Reference N^o: FOI 000376/18

I write in connection with your request for information received by the Norfolk and Suffolk Constabularies on the 25th January 2018 in which you sought access to the following information:

Under the terms of the freedom of information act can I respectfully request information in regard to your preparation and understanding of GDPR compliance.

Questions for GDPR FOI 2018

- 1 How would you describe your GDPR preparedness?
 - A Already Compliant.
 - B On target to be compliant by May 25th, 2018.
 - C Project underway but suffering difficulties.
 - D Barely Started.
 - E Haven't started.

- 2 Have you identified all your data processing partners?
 - A Yes
 - B No
 - C Unsure

- 3 Do you have contracts in place with all your data processing partners?
 - A Yes
 - B No
 - C Unsure

- 4 Do you use a third party to provide data erasure or destruction services on your end of life IT infrastructure?
 - A Yes
 - B No
 - C Unsure

- 5 If you use a third party, do you have a contract in place with them?
 - A Yes
 - B No
 - C Unsure

- 6 How have you assessed "sufficient guarantees" from this company? (Please tick all that apply)
 - In writing from them.
 - Via Contract Terms.
 - Relevant accreditation.
 - Independent Assessment / audit.

- 7 Does this contract include clarification on process for dealing with: (Please tick all that apply)?
- Breach Notification?
 - Subject Access Requests
 - Changes in processing activities which require a DPIA.
- 8 If you use a third party what is their name?
- 9 How regularly do you or an independent third party, audit this company?
- A Never
 - B Every 6 months
 - C Every 12 months
 - D Irregularly but over 12 months
 - E Unsure

Response to your Request

The response provided below is correct as of 19th February 2018.

Norfolk and Suffolk Constabularies have located the following information as relevant to your request.

- Q1 This information is not held. Work is ongoing in preparation of GDPR compliance.
- Q2 Yes, data processing partners have been identified.
- Q3 Yes, contracts are in place.
- Q4 Yes, the Constabularies use a third party for data destruction.
- Q5 A contract is in place with the third party.
- Q6 The details of the contract with E Recycling Ltd are published on the Bluelight Procurement Database website. Under Section 21(1) of the Freedom of Information Act (2000), public authorities are not required to provide information that is reasonably accessible to the public by other means, therefore in accordance with Section 17 of the Freedom of Information Act (2000), this serves as a Refusal Notice for this part of your request.

The link below will direct you to the relevant contract page:-

<https://www.blpd.gov.uk/foi/foicontractview.aspx?contractid=31636>

- Q7 As question 6 above.
- Q8 The company is E Recycling Ltd.
- Q9 As question 6 above.

This response will be published on the Constabularies web-site under the Freedom of Information pages:-

<https://www.norfolk.police.uk/about-us/our-data/disclosure-log>
<https://www.suffolk.police.uk/services/freedom-information/disclosure-logs>

Should you have any further queries concerning this request, please contact Amanda Gibson, FOI Decision Maker, quoting the reference number shown above.

A full copy of the Freedom of Information Act (2000) can be viewed on the 'Office of Public Sector Information' web-site;

<http://www.opsi.gov.uk/>

Norfolk and Suffolk Constabularies are not responsible for the content, or the reliability, of the website referenced. The Constabulary cannot guarantee that this link will work all of the time, and we have no control over the availability of the linked pages.

Your Right to Request a Review of Decisions Made Under the Terms of the
Freedom of Information Act (2000).

If you are unhappy with how your request has been handled, or if you think the decision is incorrect, you have the right to ask the Norfolk and Suffolk Constabulary to review their decision.

Ask Norfolk and Suffolk Constabularies to look at the decision again.

If you are dissatisfied with the decision made by Norfolk and Suffolk Constabularies under the Freedom of Information Act (2000), regarding access to information, you must notify the Norfolk and Suffolk Constabulary that you are requesting a review within 20 days of the date of its response to your Freedom of Information request. Requests for a review should be made in writing and addressed to:

*Freedom of Information Decision Maker
Information Management Department
Norfolk Constabulary
Operations and Communications Centre
Jubilee House
Falconers Chase
Wymondham
Norfolk NR18 0WW
OR
Email: freedomofinformation@norfolk.pnn.police.uk*

In all possible circumstances Norfolk and Suffolk Constabulary will aim to respond to your request for us to look at our decision again within 20 working days of receipt of your request for an internal review.

The Information Commissioner.

After lodging a request for a review with Norfolk and Suffolk Constabulary, if you are still dissatisfied with the decision, you can apply to the Information Commissioner for a decision on whether the request for information has been dealt with in accordance with the requirements of the Act.

For information on how to make application to the Information Commissioner please visit their website at www.ico.org.uk or contact them at the address shown below:

The Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
Telephone: 01625 545 700