

Notes from Stakeholder's forum

The Group discussed what an initial compliance statement might look like and supporting evidence that might appear under the Element.

Element 9 – The group thought that the statement should be fairly high level and refer to legislation that is in place, something like 'Personal information is managed in accordance with data protection laws'.

- Evidence of compliance with dp legislation
- DPO, where relevant (need Job Description etc?)
- copy of or link to privacy information
- how records of processing activities are managed
- evidence of a proper regard for data subjects' rights (SARs etc)

Element 10 – The group discussed how this Element should look and the broad consensus was that it should remain largely unchanged. It should also relate to business continuity in general as well as vital records.

- risk register
- IAR which refers to vital records
- descriptions and evidence on how records (irrespective of format) remain available
- appropriate regard for technology back up
- personal data to be included in business continuity planning?

Element 11 – The group talked about the Element and largely agreed that it was important to retain controls over the findability and integrity of records. Some authorities have misinterpreted the term audit trail to refer to auditing and auditors. Also agreement over the need to change the 'audit trail name'.