

FREEDOM OF INFORMATION REQUEST REFERENCE NO 2023-24-018

Your request has now been considered under the Freedom of Information Act 2000 (the Act) and we provide our response below.

You asked:

1. A copy of your organisation's Records of Processing Activity (ROPA) as defined in Article 30 of the UK General Data Protection Regulation (UK GDPR).
2. A copy of all legitimate interest assessments conducted by your organisation where you rely on Article 6(1)(f) legitimate interests as your lawful basis for processing.
3. A copy of all privacy impact assessments conducted by your organisation.
4. A copy of all data protection impact assessments conducted by your organisation.
5. A copy of all international transfer risk assessments conducted by your organisation.
6. A recent copy of your organisation's data protection compliance assessment using the Information Commissioner's Office (ICO)'s accountability framework template. If you are using your own standards to monitor compliance with the Data Protection 2018, please provide me with copy of it.
7. A copy of your organization's data protection policy.
8. A copy of your organization's subject access request policy, procedures, and processes, including any guidance material such as folder structure, naming conventions, and redaction guides.
9. A copy of your organisation's privacy notices, including but not limited to employees, customers, ministers, special advisors (SPADs), complaints, NEDS, visitors, and CCTV.
10. A copy of your organisation's due diligence questions for vendor management such as independent data controllers or processors.

Your request for information has been considered under the Freedom of Information Act 2000 (the Act) and our response is as follows:

1. A copy of your organisation's Records of Processing Activity (ROPA) as defined in Article 30 of the UK General Data Protection Regulation (UK GDPR).

This information is attached at Appendix A.

2. A copy of all legitimate interest assessments conducted by your organisation where you rely on Article 6(1)(f) legitimate interests as your lawful basis for processing.

We rely on Article 6(1)(f) legitimate interests for the processing of data related to Grant applications in order to determine value for money on behalf of the public, assessment of applications is necessary and proportionate.

This information is attached at Appendix A.

3. A copy of all privacy impact assessments conducted by your organisation.

No information held

4. A copy of all data protection impact assessments conducted by your organisation.

Attached at Appendix A.

5. A copy of all international transfer risk assessments conducted by your organisation.

No information held.

6. A recent copy of your organisation's data protection compliance assessment using the Information Commissioner's Office (ICO)'s accountability framework template. If you are using your own standards to monitor compliance with the Data Protection 2018, please provide me with copy of it.

Provided at Appendix A.

7. A copy of your organization's data protection policy.

This information is already in the public domain and can be accessed via the website of the Office of the Police and Crime Commissioner - [Link to Data Protection Policy](#)

8. A copy of your organization's subject access request policy, procedures, and processes, including any guidance material such as folder structure, naming conventions, and redaction guides.

Information not Held – The Office of the Police and Crime Commissioner does not hold a separate policy document in relation to Subject Access Requests. However, we provide information on how to submit such a request on our website here: [Link to Freedom of Information Web Page](#)

9. A copy of your organisation's privacy notices, including but not limited to employees, customers, ministers, special advisors (SPADs), complaints, NEDS, visitors, and CCTV.

This information is already in the public domain and can be accessed via the website of the Office of the Police and Crime Commissioner - [Link to Privacy Notice](#)

10. A copy of your organisation's due diligence questions for vendor management such as independent data controllers or processors.

Information not held – we would suggest contacting the South West Police Procurement for this information.

Email: procurement.department@devonandcornwall.pnn.police.uk