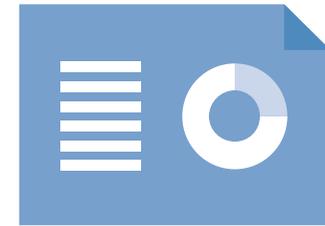


Lancashire Police

Data protection audit report

May 2019

Executive summary



Audit Methodology

The Information Commissioner is responsible for enforcing and promoting compliance with the General Data Protection Regulation (GDPR), the Data Protection Act 2018 (DPA18) and other data protection legislation. Section 146 of the DPA18 provides the Information Commissioner's Office (ICO) with the power to conduct compulsory audits through the issue of assessment notices. Section 129 of the DPA18 allows the ICO to carry out consensual audits. The ICO sees auditing as a constructive process with real benefits for controllers and so aims to establish a participative approach.

Lancashire Police (The Force) agreed to a consensual audit by the ICO of its processing of personal data. The on-site audit was undertaken at Lancashire Police Headquarter.

The purpose of the audit is to provide the Information Commissioner and The Force with an independent assurance of the extent to which Lancashire Police, within the scope of this agreed audit, is complying with data protection legislation.

It was agreed that the audit would focus on the following area(s):

Scope Area	Description
Governance and Accountability	The extent to which information governance accountability, policies and procedures, performance measurement controls, and reporting mechanisms to monitor data protection compliance to both the GDPR and national data protection legislation are in place and in operation throughout the organisation.
Data Sharing	The design and operation of controls to ensure the sharing of personal data complies with the principles of all data protection legislation.

Security of Personal Data	There are appropriate technical and organisational measures in place to ensure the confidentiality, integrity and availability of manually and electronically processed personal data.
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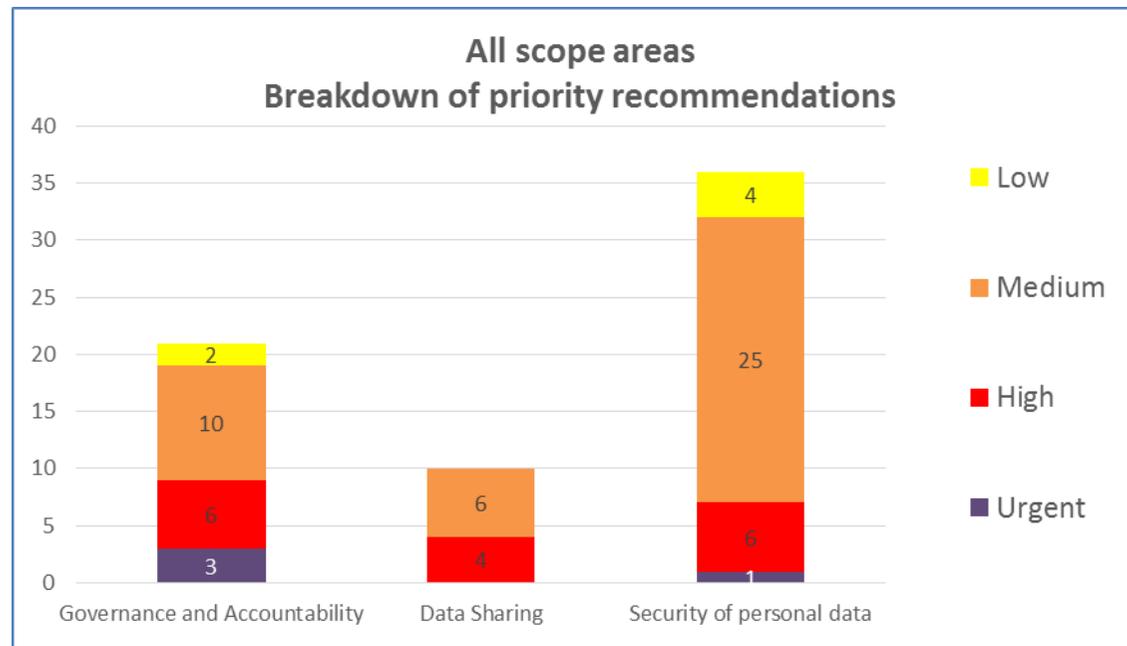
The audit was conducted following the Information Commissioner's data protection audit methodology. The key elements of this are a desk-based review of selected policies and procedures, on-site visits including interviews with selected staff, and an inspection of selected records.

Where weaknesses were identified recommendations have been made, primarily around enhancing existing processes to facilitate compliance with data protection legislation. In order to assist Lancashire Police in implementing the recommendations each has been assigned a priority rating based upon the risks that they are intended to address. The ratings are assigned based upon the ICO's assessment of the risks involved. Lancashire Police's priorities and risk appetite may vary and, therefore, they should undertake their own assessments of the risks identified.

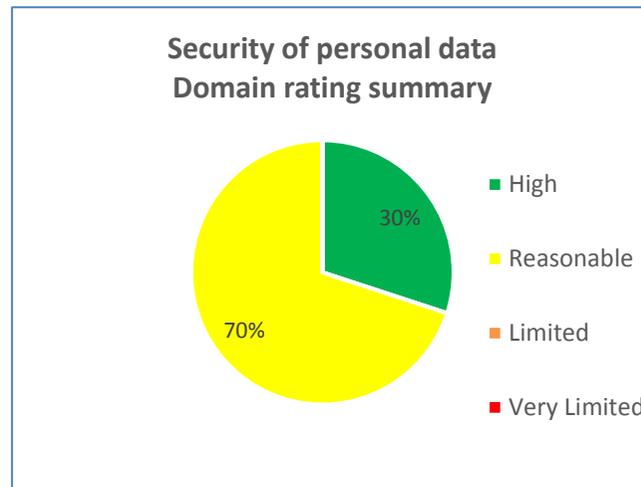
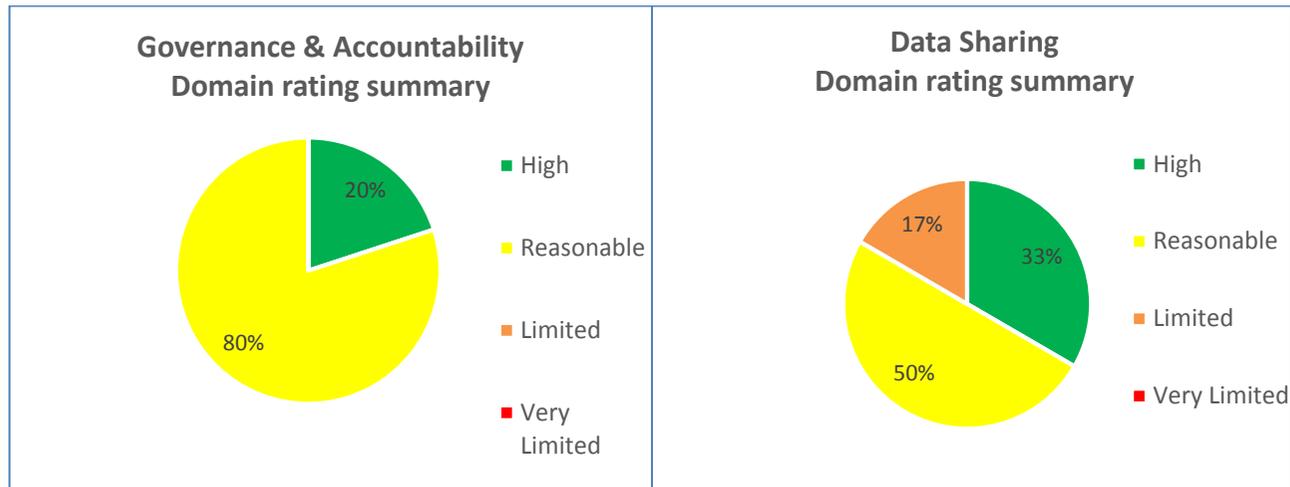
Audit Summary

Audit Scope Area	Assurance Rating	Overall opinion
Governance & Accountability	Reasonable	There is a reasonable level of assurance that processes and procedures are in place and are delivering data protection compliance. The audit has identified some scope for improvement in existing arrangements to reduce the risk of non-compliance with data protection legislation.
Data Sharing	Reasonable	There is a reasonable level of assurance that processes and procedures are in place and are delivering data protection compliance. The audit has identified some scope for improvement in existing arrangements to reduce the risk of non-compliance with data protection legislation.
Security of personal data	Reasonable	There is a reasonable level of assurance that processes and procedures are in place and are delivering data protection compliance. The audit has identified some scope for improvement in existing arrangements to reduce the risk of non-compliance with data protection legislation.

Priority Recommendations



Graphs and Charts



Areas for Improvement

Lancashire Police do not have a complete Record of Processing Activity in place, as is required by Article 30 of the GDPR. The Force should remedy this, as a priority, by continuing to undertake the Record of Processing Activity project being carried out by the MoPI Audit team. The Force should further ensure that the Record of Processing Activity contains all necessary information, including outlining the lawful basis for all processing activities.

A number of issues were found relating to the security of the processing of personal information. The Force does not currently sufficiently document the procedures and processes which are used to secure personal data, nor do they have a documented plan for regular security spot checks and desk sweeps. Comprehensive documentation of process and procedure will help the Force meet their obligations under the Accountability Principle of the GDPR.

The Force currently does not have a documented process in place to notify the affected data subjects in the event of a personal data breach occurring which poses a high risk to their rights and freedoms. Effective notification procedures will help the Force to meet their obligations under Article 34 of the GDPR to deal properly with breaches of personal data.

The Force does not currently promote the importance of information security through training and awareness campaigns to a sufficient extent. The Force should take steps to remedy this in order to ensure that all staff are fully aware of the risks of poor information security practices and their obligations under the law.

Disclaimer

The matters arising in this report are only those that came to our attention during the course of the audit and are not necessarily a comprehensive statement of all the areas requiring improvement. The responsibility for ensuring that there are adequate risk management, governance and internal control arrangements in place rest with the management of Lancashire Police.

We take all reasonable care to ensure that our audit report is fair and accurate but cannot accept any liability to any person or organisation, including any third party, for any loss or damage suffered or costs incurred by it arising out of, or in connection with, the use of this report, however such loss or damage is caused. We cannot accept liability for loss occasioned to any person or organisation, including any third party, acting or refraining from acting as a result of any information contained in this report.

This report is an exception report and is solely for the use of Lancashire Police. The scope areas and controls covered by the audit have been tailored to Lancashire Police and, as a result, the audit report is not intended to be used in comparison with other ICO audit reports.