

# Data Protection (GDPR)

## Support Packages (2021-22)

### **Platinum** (*Outsourced Data Protection Officer*)

*This package provides your organisation with a **highly experienced** (qualified in Data Protection Law), **Data Protection Officer** giving you **complete reassurance** that you will be **fully supported** and **directed** throughout your journey to compliance and maintaining this thereafter.*

The Data Protection Officer will carry out the statutory tasks set out in Article 39 of the GDPR. This will include the following activities:

- Dedicated, approachable and easy to access Data Protection Officer
- Expert advice hotline (by video conferencing, phone and email)
- Data Protection Compliance Audit; observations report and action plan
- Employee Data Protection training material
- Subject Access Request training material for decision makers
- Compliance reports for senior management and governing bodies
- A comprehensive suite of documentation to evidence your compliance, including a Data Protection Policy, Privacy Notices, Record of Processing Activity Log, Subject Access Request, Personal Data Breach and Data Protection Impact Assessment procedures, templates, logs and guidance
- Scheduled calls to discuss queries, on-going compliance and legislation updates, including an action log following each meeting
- On-going and pro-active problem-solving support and expert advice
- Direction and support following a personal data breach, request or complaint from data subjects, including managing communications (and breach reporting) with the Information Commissioner's Office
- Support when carrying out due diligence checks and Data Protection Impact Assessments on new suppliers (data processors)
- Contact point for the public exercising their rights

## Gold (Core Support for Internal Data Protection Officers)

*This package offers great support to organisations who have a Data Protection Officer or data protection lead in place, but who perhaps **lacks the time, knowledge or expertise** to fully assess their compliance measures or provide expert opinion on complex or delicate data protection matters.*

This package is great for Data Protection Officers who would like support and direction to help them carry out their duties **confidently** and **effectively**. This package includes:

- Expert GDPR advice (up to 7hrs) on all matters relating to data protection compliance (eg information sharing, breaches, complaints, requests, consent, Data Protection Impact Assessments, privacy notices, data processors etc).
- Data Protection Compliance Audit; observations report and action plan.
- Employee Data Protection training material
- Subject Access Request training material for decision makers
- Data Protection Policy
- Comprehensive set of Privacy Notices
- Data Protection Request Handling Procedure
- Personal Data Breach Handling Procedure
- Data Protection Impact Assessment template

## Silver (Essential Support)

*This package is for organisations who would like **training material, expert advice and support** with their documentation.*

- Employee Data Protection training material
- Expert advice for data protection queries (up to 3hrs)
- Review and guidance relating to your existing Data Protection Policy, consent forms and Privacy Notices

# Urgent or Crisis Support

We understand that data protection compliance isn't always easy or straight forward, so we also offer ad-hoc support to organisations in the event of an urgent matter, crisis or simply a tricky issue. This can include support with the following:

## Remote working in response to the Coronavirus (COVID19)

These unprecedented times have led to organisations having to quickly adopt remote working strategies for employees and remote learning solutions for students, to ensure they maintain business continuity. New technology should be embraced, however organisations must ensure they don't inadvertently put personal data at risk in the process. You may legally be required to carry out a Data Protection Impact Assessment (a DPIA) on certain activities, such as storing confidential data in the Cloud. Contact us for advice about how your organisation can continue to work remotely, whilst still ensuring compliance with the GDPR.

## Interim Data Protection Officer (DPO)

There may be times when your DPO is unexpectedly unavailable, for example as a result of sickness, leave, training etc. On such occasions, it's important you maintain your compliance and continue to have data protection advice and support when you need it. We can provide this cover, whether it's just for a few days, weeks or even months. The interim DPO provided to you, is highly experienced and holds a Masters Degree in Data Protection Law.

## Subject Access Requests (SARs)

Data subjects are entitled to request a copy of all the personal data held about them by any organisation. These types of requests are usually made by disgruntled individuals, which often means the records being requested contain complex or sensitive information. The process involved in deciding what should and should not be disclosed to the applicant, can often be daunting.

It's vital to manage these requests carefully and effectively, to reduce the risk of further complaint or potential litigation. We can provide you with urgent advice on how to handle these requests from receipt through to disclosure, with particular support on applying the exemptions and withholding appropriate information which the applicant is not entitled to see.

## Freedom of Information Act Requests (FOI Requests)

Members of the public are entitled to request copies of official information held by public authorities. These requests are often made as a result of an on-going complaint. It's important to manage these requests effectively and apply the exemptions robustly where appropriate, to ensure your organisation is not unduly burdened or inadvertently releases information into the public domain which it shouldn't have. We can provide support when drafting responses and advice on when to apply an exemption.

## Personal Data Breaches

If you suffer a personal data breach, it's vital you act fast to reduce the potential damage or impact it may have on the data subjects and on your organisation's reputation. It's a legal requirement to notify the Information Commissioner's Office (ICO) within 72hrs, of a breach which is likely to cause a risk to individuals. The ICO can fine organisations up to £8.5M (or up to 2% of their turnover, whichever is higher) for such breaches, and data subjects are entitled to compensation, so it's important to manage incidents effectively when they occur and prevent them in future.

We can provide urgent support, which can be tailored to your needs, whether it's independent investigation into the route cause, advice on how to mitigate the effects of the incident, advice on whether you need to report it to the Information Commissioner's Office (ICO) or notify data subjects. In the event of a serious incident, we can help take the stress out of notifying the ICO for you and manage communications and responses on your behalf. A well written response could reduce the likelihood or the severity of the action the ICO may take on your organisation!

## Data Protection Compliance Audit

Complying with the GDPR is vital for all organisations handling personal data, in order to avoid fines, compensation claims and reputational damage. We can assess your compliance quickly and provide you with a clear and easy to understand observations report, alongside a recommended action plan for any areas that need improving. These actions are set in order of priority, so you know what to tackle first. If you need further help in implementing the actions, we can help with that too!

## Complaint Management and Resolution

Data subjects are entitled to an internal review following a Subject Access Request or a Freedom of Information Request or make a general complaint about how their personal information has been handled or shared. We can offer advice on whether your practices were compliant with the GDPR or the FOI Act; provide independent investigation services or can draft complaint responses on your behalf. If the complaint is taken to the Information Commissioner's Office (ICO), we can liaise with the ICO and draft your communications on your behalf.

## Contact us for our price list, further information or immediate support

**Emergency Hotline:** 01404 812377 / 07943 659 447

**Email:** [DPO@firebirdltd.co.uk](mailto:DPO@firebirdltd.co.uk)

We pride ourselves on providing expert, jargon free and pragmatic support to our customers. But don't take our word for it, here's what our customers say about us!

*"Absolutely worth every penny! We will definitely be purchasing this service again next year"* **Headteacher (Primary School)**

*"The Data Protection Officer services we receive from Firebird are outstanding! Their expert and personal service is invaluable to us as a company, particularly when dealing with due diligence questions from our customers. The data protection laws are complex, but Firebird cuts through the jargon and misconceptions and has helped us build a tailor made compliance framework, which gives us and our customers the reassurance we need that we are meeting our legal obligations. We highly recommend their services to other companies".* **Director**

*"When we thought about outsourcing our DPO function I had no idea where to start. After some significant research, we could not be happier with the service from Firebird. I could not have found a more cost-effective solution to this important part of our compliance work.* **Headteacher (Secondary School)**

*"The quality of the service we have received has been excellent. Whilst I was initially sceptical regarding the benefit of buying in an outsourced Data Protection Officer support package, it has proven its value on a number of occasions and has mitigated the GDPR compliance workload.* **(Director)**

More testimonials are available on our website at:

[www.firebirdltd.co.uk](http://www.firebirdltd.co.uk)

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