



# Data Protection Health Checks

Bringing clarity and confidence to  
your data protection controls.



## The importance of Data Protection

The General Data Protection Regulation (GDPR) and equivalent Channel Island Data Protection legislation came into force in May 2018. In the months leading up to and after go-live, businesses across Guernsey and Jersey have been trying to understand what it means for their specific organisation and what compliance actions they need to take.

One thing is clear: every business needs to understand their data, policies and processes before they can evidence their compliance.

When processing personal data, it is vital for businesses to ensure that the appropriate safeguards and controls

are in place, and that they are effective. This is critical in order to build and maintain customer trust and to avoid both financial and reputational damage.

The European Union (EU) implemented the GDPR in 2018 and, as a result, sent organisations and businesses rushing to align their operations with requirements or face penalties for non-compliance. The regulation has significantly changed the privacy landscape at a time when technology and digital businesses are at the core of societies. It has set a precedent across the globe, forcing organisations outside the EU to also align with requirements where goods and services or monitoring of EU data subjects take place.

## The challenges of Data Protection

### Technology

Technology is changing fast and its increasing complexity introduces new challenges for organisations. It is crucial to understand, protect and demonstrate accountability for the data you hold and process, which will include ensuring your architecture and infrastructure are also compliant with the regulations and support the protection of an individual's rights.

### Process and controls

Organisations need to be able to identify the data they hold or process, and have a clear understanding of the risks of possessing that data. Once the risks are understood, organisations need to adapt processes to conform with regulatory requirements; this may result in new tools and transformation of the way data is handled with customers, employees and third parties.

### People

With the significant impact of the GDPR, it is vital to embed compliance in your organisation's culture. Employees at all levels need to be aware of the requirements and consider how they would feel about their data being processed, treating the data they handle in the way they would wish their own data to be managed. GDPR establishes accountability as an organisational principle; this means organisations should establish clear responsibilities and implement comprehensive awareness training for staff.

### How we help our clients

Our team of qualified data protection consultants have delivered projects and Health Checks across a number of sectors, often for clients who operate in multiple jurisdictions. Our guidance and approach are based on industry best practice and our experience in delivering successful change within organisations.



### The benefits of working with us:

- 1. Pragmatic and risk-based approach** – We work with you to understand the context of your organisation, ensuring the approach is fit for purpose. We also provide a practical, actionable plan, aligned to risks that you can move forward with to ensure or maintain compliance.
- 2. Subject matter experts** – Our team has a broad range of data protection experience in multiple sectors. This experience ranges from leading data protection programmes and projects to running Health Checks.
- 3. Best practice** – Our Data Protection Health Checks are based on industry standards and best practice, as well as focusing on your sector-specific requirements.
- 4. Improved governance** – Our team will make sure that any changes required to achieve or maintain compliance have appropriate governance wrapped around them, ensuring any changes are implemented with a positive outcome.

### Our Data Protection Health Checks

We understand that with data protection there is no one-size-fits-all solution. Every organisation needs to understand their data, policies and processes in order to get clarity on their compliance position.

Data protection is a lifestyle change for organisations, not a one-off crash diet. A CBO Data Protection Health Check will help you understand how you are progressing against your regulatory obligations, and what you need to do to address any gaps or risks.

Our Health Checks use a set of tools tailored to GDPR and the Channel Island Data Protection legislation.

### We offer three levels of Data Protection Health Check:

- **Rapid Review** – a one-off review, delivered through interviews with key individuals within your organisation, that will deliver a Red-Amber-Green (RAG) Report against a standard set of processes and policies recommended for compliance and include recommendations remediating any compliance gaps.
- **Targeted Health Checks** – A focused risk-based analysis of an organisation's data protection compliance and plan of action to move towards compliance. A risk register is a key output from this Health Check, alongside an Implementation Plan where each action is aligned to addressing a risk.
- **Full Data Protection Audit** – A comprehensive and detailed audit of where you are in terms of achieving your data protection requirements. A key output of this audit is a suite of project governance documents that set you up with a fit-for-purpose structure to deliver the required changes to achieve compliance.

### Case study 1

*"CBO had expertise and experience from similar projects elsewhere, which complemented the expertise of our Data Protection Officer. We were fortunate in that much of the policy work had already been completed, but embedding the new policies within Guernsey Water required significant input from ourselves and this needed co-ordination and focus. The project management and governance put in place by CBO achieved this and enabled successful delivery within the required time. Along with their collaborative approach, this was the real strength that they brought to the project."*

**Steve Langlois,**  
**General Manager Guernsey Water**

## Health Check Deliverables

	Rapid Review	Targeted Health Check	Full Audit
RAG Report	✓	✓	✓
Risk Register		✓	✓
Implementation Plan		✓	✓
High-level Data Audit		✓	✓
Detailed Data Audit			✓
Project governance set-up and documentation for identified remediation work			✓

## Case study 2

*“CBO was an excellent choice of partner in this project, ensuring FCG was able to deliver and complete on time and within budget. Working alongside our own Subject Matter Experts, CBO demonstrated their detailed understanding of the legislative changes and new requirements for our business, ensuring that each work stream understood their own objectives and deliverables ahead of the 25th May target. Any project issues were considered and addressed promptly, and any open risks were recognised and transitioned to Business as Usual after the programme closed down. All in all, this programme was used as an excellent example by FCG internally as to how such programmes should be run!”*

**Mike Leonard,**  
**Chair of First Central Group**

## Want to learn more?

If you are interested in learning more about our Data Protection Health Checks, please contact us.

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