

Sweep Results Reporting Form

Date of Sweep	September / October 2018
Country	Ireland
PEA (name of authority)	Data Protection Commission
Total Number of companies contacted	30 (Note: One organisation did not provide a response in time for it's information to be included)
Sector(s) swept Please also specify how many companies in each sector were included in the Sweep.	Pharmaceutical (3) Multinational (4) Government / Local Government (8) Transport (2) Private (3) Charity (2) Education (2) Financial (3) Other (3)
Methodology used; (Tick all that apply) If more than one methodology was used, please specify how many	Email

companies were contacted using each methodology.		
Overall results		
Common Indicator	Question	Rating Specify how many organisations were given each rating <i>Rating criteria can be found below</i>
Indicator 1: Policies, procedures and governance	The organisation has an internal data privacy policy (consistent with legal requirements), and it has been demonstrated that this has been embedded into everyday practices	Very good: 26 Satisfactory: 2 Poor: 1
	The organisation has someone at a sufficiently senior level responsible for privacy governance and management <i>Note: Where there is someone of sufficiently senior level responsible for data protection, the answer should be 'very good'. Where there is someone responsible for data protection, but they are not of sufficiently senior level, answer 'satisfactory'. Where there is no one responsible for data protection, answer 'poor'.</i>	Very good: 27 Satisfactory: 2 Poor: 0

Indicator 2: Monitoring, Training and awareness	The organisation ensures staff are given training regarding the protection of personal information by informing them of organisational privacy policies, procedures and best practices	Very good:11 Satisfactory: 18 Poor: 0
	The organisation monitors their performance in relation to data protection standards (i.e by conducting self-assessments and/or audits of your privacy programme and in relation to complaints / enquiries / breaches)	Very good: 13 Satisfactory: 13 Poor: 3
(Indicator 3) Transparency	The organisation actively maintains policies to explain how they handle personal data, and are these easily accessible to customers and the general public	Very good: 25 Satisfactory: 3 Poor: 1
(Indicator 4) Responsiveness and incident management	The organisation maintains a documented incident response procedure	Very good: 21 Satisfactory: 5 Poor: 3
	In the event of a breach, the organisation has a procedure in place to notify affected individuals and report the breach to the regulator	Very good: 23 Satisfactory: 4

		Poor: 2
	The organisation maintains an incident log detailing all breaches that occur	Very good: 27 Satisfactory: 0 Poor: 2
	The organisation has policies and procedures in place to respond to requests and complaints from individuals, and other external enquiries (such as the regulator)	Very good: 24 Satisfactory: 4 Poor: 1
(Indicator 5) Risk assessment, documentation and data flows	The organisation has documented processes in place to assess the risks associated with new products, services, technologies and business models (for instance, the organisation can demonstrate that they conduct privacy impact assessments)	Very good: 20 Satisfactory: 8 Poor: 1
	The organisation maintains an inventory of their personal data holdings	Very good: 20 Satisfactory: 9 Poor: 0

	The organisation maintains a record of any data flows (i.e. data shared with third parties)	Very good: 16 Satisfactory: 12 Poor: 1
Number of companies with a dedicated data protection officer or team (listed on website) <i>Note that this is for information purposes only. It is recognised that in some jurisdictions it is not a requirement for companies to have a dedicated officer.</i>	Total: 25 Note: 4 organisations did not have details on website, however, they did provide information at indicator 1 that they do have a DPO.	
Number of companies for which you are considering follow up action . ¹	30	

Best Practices: Did you find any examples of best practices you would like to share?

- **86% of organisations have a contact for their DPO listed on their website. We noted that 90% have privacy policies which were easily accessible from the homepage.**
- **Most organisations self-reported to have policies and procedures in place to respond to requests and complaints from individuals**
- **75% of organisation self-reported to have adequate data breach policies in place**

¹ Examples of follow-up include: conducting a more detailed assessment or investigation, contacting the data controller for information or education purposes (if not already done as part of the Sweep activity), and/or taking enforcement action.

Trends: Are there particular trends or issues that you noticed in conducting the Sweep?

- **All organisations have self-reported that they provide some form of data protection training for staff. However, only 38% of those organisations outlined training programmes for all staff, including new entrants and refresher training.**
- **In most cases, organisations self-reported that they undertake some monitoring / self assessment, but not to a sufficiently high level. 3 of the 29 respondents scored 'poor' in this section, while 13 reached 'satisfactory'.**
- **One third of organisations failed to provide evidence of documented processes to assess risks associated with new products and technology. However, most organisations indicated that they are aware of the need for this and many are in the process of documenting appropriate procedures.**
- **30% of organisations failed to demonstrate that they had an adequate inventory of personal data while almost half failed to maintain a record of data flows.**

If you looked at more than one sector, please identify any noticeable trends or differences between the organisations;

- **We noted that multinational companies scored highly and demonstrated that they have comprehensive policies and procedures in place**
- **In general, public sector bodies did not score well when it came to conducting self-assessments and/or audits of their privacy programmes**
- **The biggest number of 'poor' scores were recorded in relation to incident management and responsiveness, though no discernible sectoral trend emerged**

