

# DATA PROTECTION OFFICER – ASSESSMENT OF NEED



## Purpose

To identify if there is a legal duty or requirement to appoint a Data Protection Officer (DPO). GDPR introduces a duty to appoint a Data Protection Officer (DPO) **if** we are a public authority, or **if** we conduct certain types of processing activities. **Barrett Steel is NOT a public authority.** However, DPOs assist in the monitoring of internal compliance, inform & advise on our data protection obligations, provide advice regarding Data Protection Impact Assessments (DPIAs) & function as a point of contact for data subjects & the supervisory authority.

## Definition

Where GDPR is written this refers equally to UK & EU GDPR legislation unless definitively identified otherwise.

## Scope

The Group has assessed the data it processes, paying particular attention to any systematic monitoring & recording of data, the output of which supports the assessment of need as to whether a DPO is a requirement. Specific consideration has been taken surrounding the **CCTV, Health Screening, Credit Reference, IT Use & Application, DVLA, Payroll, HR & Recruitment** activities due to the volume of data involved.

## Roles & Responsibilities

Having confirmed our core activities have no such requirement for a DPO & are of minimal risk but still wishing to demonstrate a responsible approach to GDPR, **Barrett Steel has appointed the Group IMS Director to be the data protection lead for the Company instead of a stand-alone DPO role.** In this role the Group IMS Director will operate on an independent basis, & although NOT an expert in data protection, they will be adequately resourced, & report to the highest management level. The Group IMS Director will help the Company demonstrate compliance & are part of the enhanced focus on accountability.

The Company will involve the Group IMS Director, in a timely manner, in all issues relating to the protection of personal data. The Company will not penalise the Group IMS Director for performing their duties. The Company will ensure that any other tasks or duties assigned to the Group IMS Director do not result in a conflict of interests with their role as a data protection lead.

The Group IMS Director is tasked with monitoring compliance with the GDPR & other data protection laws, data protection policies, awareness-raising, training & audits. The Company will take account of the Group IMS Directors' advice & the information they provide on data protection obligations. When conducting a DPIA's, the Company will seek the advice of the Group IMS Director who also monitors the process. The Group IMS Director acts as a point of contact for the ICO. They will co-operate with the ICO, including during prior consultations under Article 36, & will consult on any other matters.

## Commitment To Compliance

When performing their tasks, the Group IMS Director has due regard to the risks associated with processing operations, & considers the nature, scope, context & purposes of processing.

The Group IMS Director is easily accessible as a point of contact for our employees, individuals & the ICO. This can be done via [GDPR@barrettsteel.com](mailto:GDPR@barrettsteel.com)

The Company has undertaken a full assessment regarding the need to appoint a DOP & used guidance obtained via the ICO website, including the completion of a questionnaire relating to the specific needs of appointing such a position, verified via the [www.ICO.org](http://www ICO.org) website.

*Andrew Warcup*

Andrew Warcup  
Chief Executive Officer  
December 2023

Issued	Dec-2021	Last Review Date	Dec-2023
Author	Sharon L Smith	Next Review Date	Dec-2024