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EIS is the trading arm of
Cantium Business Solutions Ltd.

Company House Number: 11242115

Data Protection Officer as a Service (DPOaaS)

Service Definition Document

Cloud Support

RM1557.15

Version: 1.0

OFFICIAL

1. Introduction

1.1. Data Protection Officer as a Service (DPOaaS) with EIS

EIS (the trading arm of Cantium Business Solutions Ltd.) recognises that organisations need affordable, reliable, and competent compliance support. The Data Protection Officer (DPO) plays a key role in your organisation's data protection governance structure and in improving accountability. The EU General Data Protection Regulations (GDPR) have been law since 2016 and were made mandatory UK law May 2018. On the same day GDPR became mandatory the UK Data Protection Act 2018 (DPA 2018) (which supplements and tailors the GDPR) was passed into law. Both must be complied with and understood. Having a recognised DPO is necessary for compliance with both GDPR and DPA 2018. Since Brexit, the UK is subject to United Kingdom General Data Protection Regulation (UK GDPR).

EIS's DPO as a Service (DPOaaS) is a practical and cost-effective solution for organisations that do not have the data protection expertise and knowledge to fulfil their Data Protection obligations and comply with data protection legislation. With this annual subscription service, EIS will serve as an independent data protection expert to your organisation.

1.2. Service Overview

Our collaborative 'DPO as a Service' approach is there to provide you with the knowledge and expertise in data protection legislation, which are fundamental for all organisations.

By using EIS's DPOaaS you will gain access to expert advice and guidance from a dedicated team of Data Protection Officers, who will work with you to help you to meet the demands of data protection whilst remaining focused on your core business activities.

As part of this service, you will also have access to an innovative GDPR cloud-based platform designed specifically to offer complete management of General Data Protection Regulation, assisting Data Protection Officers (DPOs), and 3rd party data processors in your organisation. It reflects existing processes, whilst pro-actively prompting you to meet and exceed the General Data Protection Regulations.

Advantages of the GDPR cloud-based platform include:

- The system provides a full audit of any requests.
- You can evidence for the ICO the action you have taken.
- You can show exactly who the request came from, the response time and how you responded.
- The audit trail on the system will show you any training that has taken place for staff, the awareness of GDPR across your organisation and where the data is held.

Service scope:

- Advice and guidance on preparation of reports for board meetings as required.
- Advice on request to support with key decision making.
- Advice and remote support to comply with DPA 2018 and UK GDPR.
- Advice and support with the production of a risk register.
- Support you in the production of Information Governance Development/ Improvement Plan.
- Advice on requests (SAR, FOI, etc).
- Advice and guidance on Issue/ Breach Management (up to 6 hrs per establishment per annum).
- Reporting of issues to and liaison with the ICO.

1.3. Features and Benefits

Features	Benefits
• DPO service desk and cloud based data solution. • Advice on legal obligations and good practice. • Support with Data Protection policies and procedures. • Monitor compliance of GDPR and data protection legislation. • Support with requests for information for FOIs and SARs • Advice on Data Protection Impact Assessments. • Investigate data breaches. • Strategic planning. • Data protection awareness and staff training. • Annual Evaluation of compliance audit and reporting.	• Meets all GDPR legislative requirements. • Named Data Protection Officer (DPO). • Central point of contact for all data protection issues. • Experienced DPO service supporting over 100 organisations. • Liaison with 3rd parties such as the ICO.

1.4. About Us

As a Local Authority owned trading organisation (LATCo) and wholly owned by Kent County Council, EIS (the trading arm of Cantium Business Solutions) has over 35 years' experience supplying IT services to the Public Sector. As such, we have developed a comprehensive managed service portfolio, built alongside a strong partner network, to support and complement the services we deliver in-house.

We are in the privileged position of being part of a collection of sister companies under the Commercial Services Group which provides us with access to a network of LATCos, all with a joint focus on improving services within the Public Sector. The Commercial Services Group consists of thirty three trading brands offering a wide-range of services

to the Public Sector, from legal and procurement services to education advice, supplies and energy procurement.

Our highly experienced and dedicated teams, consisting of over 300 ICT specialists, provide advice, guidance and support to over 33,000 users. With a customer base of over 700 organisations across the Public, Private and Education sectors, EIS offers a range of ICT services tailored to our customers' individual needs, including fully managed Operational, Security, Professional and Network Services.

As a Local Authority owned business, we are in the unique position to truly understand the Local Government landscape. We appreciate the budget restraints faced within the Public Sector and the delicate balance between implementing new technologies and innovations, whilst ensuring the vital public services remain robust and unaffected by change.

- The Public Sector is part of EIS's DNA.
- Wholly owned by Kent County Council with our profits staying in the public sector.
- Successfully traded for over 35 years both as part of the Local Authority and as a standalone company.
- Experienced at delivering back-office services to a diverse range of customers.
- Commercially astute with a collaborative, partnership-based ethos and approach.
- ICT and Professional partner to over 700 organisations including local authorities, central government, NHS trusts, Multi-Academy Trusts and colleges.

Customer experience is at the heart of what drives us as a business, which has been solidified in our recent glowing report from our Customer Service Excellence (CSE) accreditation. CSE is a diagnostic tool and benchmark for excellent customer service and EIS has proved the very essence of the requirements in the CSE standard; that the customer is truly at the heart of what we do.

2. Service Management

In order to provide an efficient and professional service, we will deliver our Data Protection Officer as a Service (DPOaaS) to a clear and robust Service Level Agreement (SLA), providing complete transparency on the service levels delivered and to ensure our response is timely and meets expectations.

2.1. DPOaaS Support Scope

- Access to an online GDPR Platform.
- Initial scoping/ health check.
- DPO service desk.
- Support with development of suitable data protection policies and procedures.

- Advice and guidance on legal obligations.
- Ongoing compliance monitoring.
- Support with requests for information for FOIs and SARs.
- Advice on the undertaking of Data Protection Impact Assessments.
- First point of contact for supervisory authority.
- Advise on internal data collection, processing and retention activities.
- Advise on required investigation and escalation of data breaches.
- Advise on remedial actions to be taken.
- Review and advise on data privacy impact assessments via the GDPR platform.
- Support with strategic planning for data protection can be provided as part of an audit.
- Data protection awareness and training sessions for staff can be provided as part of additional training either remotely or on-site.
- Annual evaluation of data protection compliance audit and reporting can be provided as part of an audit.

1st/ 2nd Line Support:

- Guidance via our service desk for customers to correspond with individuals wishing to exercise their rights.
- All emails acknowledged within 2 working hours and actioned within 24 working hours.
- A set framework to support responding to individuals' information rights requests within the mandated time frames – all Subject Access Request support required to complete the request within 1 month.
- Communication with key stakeholders responsible for gathering information that has been requested under a Subject Access Request (SAR).
- All requests and services reviewed by the appropriately qualified and experienced DPO for quality assurance and control.

Line/ Escalation Support:

- Communication with the ICO in the instance of a serious breach to determine whether the breach will be investigated by the supervisory authority.
- Support to ensure reporting to the supervisory authority is completed within 72 hours.
- Continued support and communication between the customer and the supervisory authority in the event of a breach.

2.2. SLA, Including Support Hours and Availability

We deliver a standard support service to the following SLAs:

Priority	Response Target	Resolution Target	Description
P1	20 Business Minutes	6 Business Hours	Complete loss of service
P2	1 Hour	10 Business Hours	An issue that results in a degradation/ loss of service affecting over 50% of users
P3	1 Business Day	3 Business Days	An issue that results in a degradation/ loss of service affecting more than one user but less 50% of users
P4	1 Business Day	4 Business Days	An issue that results in a degradation/ loss of service affecting one user
P5	Business Days	5 Business Days	A non-service affecting issue, eg, name or hunt group incidents

2.3. Service Desk Availability

Service Performance parameters specific to the service(s) covered are as follows:

- A supporting DPO service desk available 9:00am to 5:30pm, Monday to Friday (except bank holidays), to respond to 1st and 2nd line support requests.
- An appropriately qualified and experienced DPO will be available to provide support you Monday to Friday (except bank holidays), to respond to 3rd line support and escalation requests.

Helpdesk Support	Availability
Telephone Support	09:00 to 17:30 (UK time), Monday to Friday excluding English Bank Holidays
Email Support	09:00 to 17:30 (UK time), Monday to Friday excluding English Bank Holidays
Web Chat	09:00 to 17:30 (UK time), Monday to Friday excluding English Bank Holidays

2.4. Service Constraints

There are no constraints applicable to this service.

2.5. Training and Support / Consultancy

EIS can provide additional staff training and awareness sessions. This can be designed around the needs of the customer and delivered onsite or remotely.

Training can be purchased at an additional cost to customers.

2.6. Financial Recompense for not meeting Service Levels

Please refer to EIS's terms and conditions of sale for financial recourse arising from default by either party. Service credits are not included in this framework offer, unless defined within the service or product Service Level Agreement (SLA).

3. Onboarding and Offboarding

3.1. Onboarding

EIS prioritises establishing a clear and effective onboarding strategy with every new customer. We will ensure that every migration to a new application, software, or service is performed with the least possible disruption and highest possible satisfaction.

We make every effort to be as transparent as possible during the Onboarding process.

From EIS's Onboarding Team, you will be appointed a dedicated Onboarding Officer. The onboarding process will begin with a Project Initiation Meeting. Following the initial meeting your Onboarding Officer will also set up regular project calls with you and any relevant members of the EIS team to help keep the project on track, update stakeholders on progress and highlight any areas of concern.

Onboarding is where we have our first opportunity to establish a great relationship with our customers; put simply, we know that first impressions matter. Our onboarding approach covers five key steps, as shown below:

3.2. Implementation Plan

From day one, EIS will work with you in order to respect your needs and requirements.

We will work together to outline your aims, create an implementation plan, and establish stakeholders in order to keep the Onboarding process as transparent as possible.

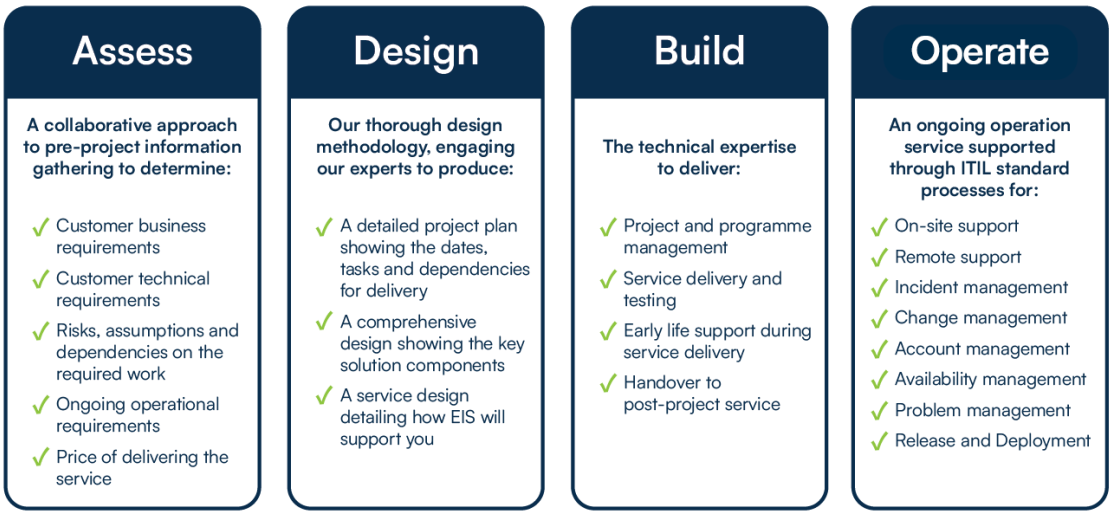
EIS's experience and expertise combine to create a truly bespoke service for your organisation. Using industry-leading, proven methods, we can work hand-in-hand with you to take your ICT Services to the next level.

We will work with you to create a bespoke support plan that caters to your organisation's individual needs.

EIS will work with you to understand your existing processes and where they can be improved to maximise the performance of your DPO service. Your configuration set will be delivered in line with your priorities as part of the overall project scope.

Your Implementation Plan will follow the principles of our Project Delivery Approach. Every service, software, application, and consultancy that we offer follows these principles, ensuring your solution is planned and executed thoroughly.

Our delivery approach covers four key principles: Assess, Design, Build and Operate. A summary of these principles is as follows:



3.3. Offboarding

We take Offboarding and Exit Planning seriously, ensuring that our transparency and flexibility at the end of your solution's lifetime matches that of the beginning.

When offboarding, all property, data and information held in connection with the Framework or Call Off Contract will either be returned or destroyed as per EIS's Secure Disposal Policy.

An Exit Plan specific to the individual customer's service requirements will be agreed as part of the Offboarding process ensuring that you receive a bespoke service and will be issued as part of the call-off contract.

Your Offboarding plan will include:

- A dedicated Offboarding Officer who will be responsible for fine-tuning the offboarding process.
- A clear data return policy, defined as part of your original Onboarding process. All of your data will be either returned or destroyed, in line with EIS's Secure Disposal Policy and your own individual needs.
- Clear communication throughout the contract termination process.
- Clear advice and support during any migration.

For details relating to Contract Termination, please refer to G-Cloud framework terms and associated EIS standard Terms and Conditions of sale for rights to terminate.

All Offboarding process and Exit Plans must be agreed with in line with EIS's Terms and Conditions of Sale.

3.4. Outcomes and Deliverables

Specific outcomes and deliverables will be agreed upon with your Onboarding Officer as part of the initial Implementation Plan. Part of communicating our shared vision is establishing clear outcomes and deliverables, working towards them, and reviewing them as part of our ongoing transparency.

3.5. Trial Availability

A demo platform is available for trial, please contact us for access to this.

4. Responsibilities and Requirements

4.1. Customer Responsibilities

Customer responsibilities and/ or requirements in support of this Service include:

- To ensure SLAs are met we request queries to be logged by the customer via email in the first instance.
- Users of the service are required to have a competent, trained data protection lead within the organisation.
- We request the customer to provide reasonable access to personnel upon reasonable notice.
- We will normally only require access to customer's personnel during business hours but may require the customer to provide access at other times if the situation demands it.

4.2. EIS Responsibilities

EIS responsibilities and/or requirements in support of this Service include:

- Ensuring we meet response times associated with service-related incidents as detailed in the Service Level Agreement.
- Providing appropriate notification to Customer for all scheduled maintenance.
- Aim to provide a customer focused cost effective and high quality of service for the areas of work defined within the Service Level Agreement.
- Changes to services will be communicated and documented to all customers.

4.3. Technical Requirements

The service utilises a cloud-based system and is accessible through a wide range of web enabled devices such as desktops, laptops, tablets - with the latest version of Chrome, Edge or Firefox.

5. Prices, Invoicing and Contracts

5.1. Pricing Model

Please refer to our G-cloud rate card.

5.2. Ordering and Invoicing

Customers will be required to complete and sign the G-Cloud framework offer terms and conditions order form.

All customers will be required to apply for a trade account and provide supporting evidence relating to all financial due diligence enquiries requested by EIS.

Trade account payment terms are 30 days from issue date of an undisputed invoice.

While this is our standard approach, EIS's aim is to make partnering with us as simple as possible. If you would like to discuss further options, please contact us at sales@eis.co.uk or telephone 03301 650000.

5.3. Contract Termination

For details relating to Contract Termination, please refer to the G-Cloud framework terms and associated EIS standard Terms and Conditions of sales for rights to terminate

6. Security and Resilience

6.1. Data Backup, Data Restoration and Disaster Recovery

Protecting our customer's data is of paramount importance to EIS, across all our services and sectors. Responsibility and openness when providing backup and restore services lies at the heart of every partnership we share with our customers.

6.2. Business Continuity and Disaster Recovery

EIS's approach to Business Continuity Management is aligned with industry best practice and standards including ISO 22301:2019. It provides a framework for corporate and service level management of business continuity to ensure that EIS is resilient and able to continue to deliver its services and recover effectively from a significant business disruption.

EIS's Business Continuity and Disaster Recovery (BCDR) plan details the processes and arrangements EIS (and its subcontractors) will follow to:

- Ensure continuity of the Customer's business processes and operations supported by the services following any failure or disruption of any element of the deliverables; and
- Recover the deliverables in the event of a disaster.

EIS's BCDR plan is tested regularly to ensure its effectiveness in the event of a failure or disruption to the services.

6.3. Business Continuity and Disaster Recovery Objectives

EIS's Business Continuity and Disaster Recovery plan supports the delivery of the following objectives:

- To ensure continuity of provision of the deliverables in accordance with the Contract at all times during and after invocation of the BCDR plan.
- To minimise, as far as reasonably possible, the adverse impact of any disaster.
- To provide a process for the management of disaster recovery testing.
- To ensure compliance with security standards is maintained for any period during which the plan is invoked.
- To ensure BCDR arrangements are upgradeable and sufficiently flexible to support changes to the deliverables and business operations supported by them.
- To recover to standard operation mode with minimal disruption to services.
- To ensure lessons are learned and inform the continuous improvement of BCDR arrangements.

EIS undertake due diligence on subcontractors to ensure adequate BCDR arrangements are in place before engaging them as part of our supply chain and review this on an ongoing basis.

Where elements of the services are supported by subcontractors of EIS, EIS and the subcontractor will notify the other party in the event their respective BCDR plans are invoked. EIS will work together with the subcontractor to manage any failure or disruption in line with the BCDR arrangements in our contract with the subcontractor.

6.4. Information Security

We commit to ensuring that all personal and sensitive data processed on behalf of our customers is done so in accordance with Data Protection legislation, information governance and security best practice.

6.5. Our Organisational Controls

We will maintain appropriate organisational and technical measures to ensure the services we provide are secure and fully compliant with Data Protection legislation. These include, but are not limited to, the following:

- Data Protection, Information Security, Information Governance and related policies and procedures are in place and reviewed regularly. Copies of these can be provided upon request.
- All staff are required to complete mandatory Information Governance, GDPR/ Data Protection and Cyber Security e-learning which is renewed every two years.
- Physical access controls including swipe card/ ID card access to buildings, buildings opened and locked by security each day, clear desk and screen policy and control of access to secure areas.
- All staff contracts of employment include a clause detailing the responsibilities required of every individual when handling data of any kind.

6.6. Security Management

It is the policy of EIS to maintain an Information Security Management System designed to meet the requirements of ISO 27001. EIS has a dedicated Strategy & Governance team that is responsible for ensuring our organisation complies with all legal requirements, codes of practice and requirements prescribed to maintain our certifications which include ISO 9001, ISO 14001, ISO 27001 and Cyber Essentials Plus.

We have a range of established policies and processes to support the controls mentioned above, meaning you can feel safe in the knowledge that we have the necessary controls already in place to deliver a fully secure and compliant service. These include, but are not limited to:

- Statement of Applicability for Security Measures
- Acceptable Use Policy
- Access Control Policy
- Cyber Security Incident Management Policy
- Disposal and Destruction Policy
- Information Security Policy
- Password Policy
- Safe Use of Removable and Online Storage
- Software Update and Patch Management Policy
- Supplier Security Policy.

6.7. Data Protection

EIS is committed to fulfilling its obligations under the UK GDPR and Data Protection Act 2018 and any subsequent data protection legislation, incorporating any appropriate additional obligations as required by the customer.

EIS is registered with the Information Commissioners Office (ICO) and has appointed a Data Protection Officer to monitor compliance with data protection legislation across our business activities.

7. Accreditations

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