

sets out the issues involved and the steps that the user has agreed to take to comply with the data protection principles. The undertaking is signed by a senior officer at the organisation concerned and is drafted in such a way that the Registrar can take action if the undertaking is breached. This technique have been used in a number of cases where the consideration of enforcement can lead directly to an undertaking or it can lead to a preliminary notice and then to a formal undertaking.

There are two *appeals* against an Enforcement Notice to the Data Protection Tribunal, which are quite important as they may resolve some of the questions raised by the Registrar in relation to fair obtaining of personal data involving the details and timing of the notification.

The DPR received 16,500 new applications for *registration*, 22,000 requests for amendment, 113 registration refusals and 3 appeals against refusals.

The DPR will have to reduce his promotional efforts due to financial cuts and

will therefore concentrate on maintaining and distributing existing material and will make use of Citizens Advice Bureaux to address data subjects and bodies representing small firms.

Finally, **monitoring and research**. There have been a couple of compliance projects on monitoring, for example:

The DPR contacted 203 advertisers with a view to looking at whether the requirements of the Act for registration and compliance with the DP principles were being met. The DPR found out that the requirements were often not being met, and that there were problems of compliance in both areas. Some of them led to prosecution and enforcement actions.

Another project involved town tests (Cambridge, Stockport and Dundee) where a particular area is targeted in order to promote information about the Act by distributing leaflets, through media coverage, attending trade exhibitions, and making random visits to businesses to ask whether they hold personal data and if they are aware of the Act. This

SIMON MOULTON : AN APPRECIATION

Early this year, I learned that Simon Moulton, Assistant Registrar at the Office of the Data Protection Registrar in the UK, had suddenly died. This newsletter goes to press exactly four years since we first met on October 19th 1988.

Simon Moulton was a barrister and had worked in labour relations before joining the Office of the Data Protection Registrar in April 1986.

On hearing of the tragedy, I immediately wrote to Eric Howe, the Registrar:

I was devastated to hear that Simon Moulton has died and am writing to express my deep shock and sorrow. You have lost an outstanding colleague for whom I had the greatest respect. I met him at our first Privacy Laws & Business conference in London in October 1988 and he proved a most helpful contact at your office ever since.

Simon made useful contributions when he attended the Data Protection Authorities' Forum meetings on consumer credit in Denmark in 1989 and insurance in Switzerland in 1990. He also spoke at our annual conference in Windsor in 1989 and at our Managing Data Protection and Employee Relations conference in June 1990 in London.

On every subject, Simon displayed a command of the issues, a firmness on data protection principles and flexibility on how they might be interpreted in specific situations. He was surely a model policy adviser.

As one of the first members of your staff with whom I made contact, he always made himself available to discuss the progress of various policies. I know that you will miss his finely balanced judgement combined with his warm and modest manner. I will.

Please convey my condolences both to your colleagues and his family. I share your loss.

Stewart Dresner, Publisher