

NEW UK DATA PROTECTION REGISTRAR MAKES DEBUT AT PL&B CONFERENCE

Mrs Elizabeth France made her first public appearance before taking up the post of Data Protection Registrar on 1st September, at the Privacy Laws & Business 7th Annual Conference on 13th July at Cambridge.

Setting out her future agenda, she said that initially she will be listening to her staff and the public, gathering and absorbing information and meeting people to discuss the issues before formulating a clear policy framework by the end of the year.

As any newly appointed good business manager would, she will be looking at the efficiency of the existing operation, whilst establishing the key objectives of the service, before coming up with any changes to the way the service is run. She will be looking at the funding mechanism amongst other things.

Her approach is to be practical and based on common sense, utilising her considerable experience in the Home Office implementing

legislation. Among the key elements of experience which qualified her for this job, she quoted her membership of the committee for the co-ordination of computerisation in the Criminal Justice System (CCCJS) and as an active participant in the work of the Government Centre for Information Systems. She also considered that her experience as head of the Home Office's Information and Pay Service Division gave her detailed knowledge of the issues when implementing new technology in a large organisation.

When pressed on her independence, she said she felt this concern was based on some misconceptions but challenged critics to judge her on her future performance.

The conference participants welcomed her agreement to return to Cambridge for the *Privacy Laws & Business 8th Annual Conference*, to be held 10-12, July, 1995, to report on her first year's activities.

Eric Howe retired at the end of August after ten years as the UK's first Data Protection Registrar.

This report was written by Andrew Winch, Information Systems Strategic Advisor/Data Protection Officer, Northamptonshire C. C.

DPR ISSUES DRAFT GUIDANCE NOTE ON DOCUMENT IMAGE PROCESSING SYSTEMS

One of the first policy tasks undertaken by Elizabeth France on taking office was to approve the issuing of a draft guidance note, *Data Protection Guidance for Users of Document Image Processing (DIP) Systems* on which comments should be submitted by December 16th, 1994.

David Smith, Assistant Registrar, who is the principal author of the draft, writes in his covering letter: "Before issuing the guidance in its final form, the Registrar would welcome any comments organisations representative of users or suppliers of image processing systems may have. It would be particularly helpful if any comments could identify points where the Registrar may not have fully appreciated either the capabilities of image processing technology, or the variety of uses to which the technology might be put."

Privacy Laws & Business is helping the consultative process by organising workshops in mid-November where data users may have a roundtable discussion with David Smith to exchange views on the application of the Data Protection Act to DIP (see page 32).

The guidance note's introduction explains that "organizations are not likely to have applied the data protection disciplines to their current manual information systems. If they simply load an existing collection of manual records containing personal information onto a DIP system, they may have difficulty complying with the requirements of the Data Protection Principles. Data users introducing DIP into an existing information system will, therefore, need to review and adapt their systems to ensure there is no breach of the Act's requirements. This might, for example, require the redesign of forms on which personal details are collected."

The note then has the following sections: What is Document Image Processing?; Are personal data processed?; Registration; The Data Protection Principles; The Registrar's Approach to Enforcement of the Data Protection Principles.

The draft guidance note is available from the Office of the Data Protection Registrar, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, UK. Tel: + (44) 625 535777 Fax: + (44) 625 524510.