

Appendix A

General Data Protection Regulation Compliance - Progress to Date

No	Action	Who	By When	Expected Outcome	Actual Outcome	Comments	Status
1	Ensure all employees undertake Data Protection Awareness on-line learning	ICT Audit & Compliance Team / DPO	December 2018 & February 2019	All employees trained on basic data protection and training records updated.	88% employees trained in Nov 17, target of 95% is required in 2019	Follow-up DPA 2018 training to commence Nov 18	In progress
2	GDPR training workshops to be provide to elected members and senior officers	ICT Audit & Compliance Team / DPO	May 2019	All managers and elected members are aware of the impact of the new legislation	70% Councillors trained to date	Councillor training commenced June 18 at CDC & WODC FODDC. Regular refresher sessions will be scheduled in.	In progress
3	Data Protection Officer (DPO) Appointment	ICT Audit & Compliance Manager	April 2018	DPO is statutory GDPR requirement. Board and Cabinet approval required		Shared DPO formally appointed at all partner Councils (ex CBC) & Publica	Completed
4	Produce new GDPR & Information Security Good Practise Guidance for Cabinet Members	DPO	May 2018	Councillors GDPR Guidance completed and circulated to all members			Completed

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5	Updating of Data Breach reporting procedures	DPO	May 2018	Formal procedure in place for all employees to work to		Breach Procedures completed and available to all staff on corporate website	Completed
6	Data Breach Register in place and monitored	DPO	Quarterly	Central Incident / Breach register implemented and regular monitored		Register established	On-going
7	Update Subject Access Request (SAR) Personal information procedures	ICT Audit & Compliance Manager	May 2018	New SAR procedures implemented and compliant with new legislation requirements: <ul style="list-style-type: none"> • Free – no fee charges • SAR Forms available on council webpage 		SAR information available to public on all corporate website sites	Completed
8	Update all existing Publica and partner Council ICT User Policies and relevant data security guidance.	ICT Audit & Compliance Manager	July 2018	ICT Policies & guidance's comply with Information assurance requirements		ICT Polices are now available to all staff	Completed
9	Public Sector Network (PSN) Compliance for partner Councils	ICT Services team	June 2018	The PSN compliance demonstrates the Councils have met the Government Information assurance		Publica achieved the Public Services Network (PSN) Connection compliance for all partner Councils	Completed

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10	Update intranet and website to reflect GDPR & IT security requirements	DPO	On-going	Staff and public fully aware of GDPR requirements		Promote more good practise guidance	In progress
11	Update all Personal Data Transparency notices (Council Privacy Notices)	DPO	May 2019	Council Services 'Privacy Notices' to be disclose transparency requirements	Essential Privacy Notices has been completed	Approx. 20 Privacy Notices per Council required	In progress
12	Deliver training in the form of a workshop to key staff on data protection Privacy Impact Assessments (PIAs).	DPO	May 2019	Revised PIA procedures drafted (Sept 18) Managers equipped with the correct paper work to undertake PIAs		Revised PIA's procedures to be uploaded on Portal	In progress
13	Produce Register of Processing Activities (RoPA) for Publica & partner Councils	DPO	May 2018	Maintenance of all processing activities which involve personal data	Completed prior to 25 th May 18	RoPA available on corporate website	Completed

No	Action	Who	By When	Expected Outcome	Actual Outcome	Comments	Status
14	Review current contracts and rewrite Data Sharing Agreements for compliance with GDPR	DPO & Legal team	On-going Action	All contracts (including employment) & Data sharing agreement comply with GDPR /DPA legislation		Quarterly monitoring of progress by DPO	In Progress
15	Implement Services (Specific) GDPR Action Plans	DPO	August 2019	<p>GDPR Services Action Plan to assist & monitor services compliance on:</p> <ul style="list-style-type: none"> • Data retention • Sharing Agreement review • Contract reviews • Data Transfer - Encryption requirement • Forms compliance • Impact Assessment • Risk Management 		Quarterly monitoring of Action Plan progress by DPO	In Progress
16	ICO Registrations Review for the Partner Councils & Publica	DPO	Quarterly	Financial reduction on our ICO registration fees from July 18	ICO registration opportunity cost savings totalling <u>£11,360</u> identified	Registrations review updated & financial savings agreed with ICO	Completed

(END)

