

## Appendix 1 – GDPR Action Plan

Status Key:	
	Action completed
	Action underway- but there is still more to do
	Action not yet started

Workstream	Action	Target completion date	Status/ Progress to date
1. Policies and procedures	a) Carry out a review of the council's Data Protection Policy	June 2022	Not yet started
	b) Carry out a review of the council's Breach Reporting Policy.	August 2022	Not yet started
	c) Develop a policy for the use and storage of photographs.	May 2022	The policy has been drafted. A storage solution for all corporate photographs now needs to be established.
2. Data audit	a) Review the previous data audit and work through this with individual service areas in order to establish all data that is processed, retained and/or shared (including data obtained in the response to Covid-19).	September 2022	The 2018 data audit has been reviewed- this identified a number of gaps. A refreshed data audit questionnaire and further work is needed with Operational Managers on this.
	b) Risk assess each service area based on data protection risks, type of data held, regularity of data deletion etc. Risk assessment to be reviewed on a regular basis.	October 2022	Not yet started
3. Data retention and disposal	a) Review the council's corporate data retention schedule and update as necessary.	September 2022	<i>This will be completed as work with individual service areas is progressed as part of the data audit.</i>
	b) Review LGA Inform Plus records retention guidance in relation to Covid-19 and update retention schedule as necessary.	July 2021	<b>COMPLETE</b> Covid-19 data is now reflected within the corporate retention schedule.
	c) Review data retention in relation to Office 365.	February 2022	A DPIA for the use of Office 365 has been carried out and an approval process for sharing data with third parties via 365 is now in place. Further actions are required in relation to: <ul style="list-style-type: none"> <li>Developing an Acceptable Use Policy for the above</li> </ul>

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			<ul style="list-style-type: none"> <li>• Publishing an Office 365 privacy notice</li> <li>• Office 365 applications to be reflected in corporate retention schedule</li> </ul>
	d) Publish the council's current corporate retention schedule.	March 2021	<b>COMPLETE</b>
	e) Establish a process for maintaining the schedule and monitoring retention periods.	October 2020	<b>COMPLETE</b> This will be monitored through Internal Audit assurance.
	f) Review email distribution lists.	April 2022	Not yet started
	g) Issue prompts to clear out mailboxes and monitor those over 2GB.	March 2022	A report on mailbox sizes has been produced. It was agreed at Information Board that a note would be taken to management team regarding mailbox options- likely to introduce a time limit on inboxes.
4. Privacy impact assessments	a) Review the existing privacy impact assessment template	June 2022	A new draft DPIA template has been developed and tested on some DPIA assessments before making any final changes. The next step is to develop this into a digital online process.
	b) Develop guidance around when a PIA should be carried out- with reference to the risk management and project management processes.	July 2022	Not yet started
	c) SPoC to attend Programme Board to ensure all new projects are supported with a PIA where appropriate.	October 2020	<b>COMPLETE</b> SPoC is now on Programme Board distribution list and will attend future meetings.
	d) Review existing DPIA's in the context of international transfers (as per MHCLG guidance on post EU exit preparedness)	May 2022	Not yet started
5. Data breaches	a) Review current practices and documentation in relation to data breaches and determine any areas for improvement.	October 2022	Not yet started

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	b) Introduce a reporting process whereby the Information Board receive regular updates regarding data breaches.	November 2020	<b>COMPLETE</b> The Information Board was provided with a data breach update at its meeting on 06/10/20. This will be a standing agenda item moving forward.
	c) Introduce a 'follow up' procedure for the lessons learnt/ recommendations from data breaches to ensure they are implemented.	March 2021	<b>COMPLETE</b> Lessons learnt/ agreed actions will be subject to quarterly follow ups, undertaken by Internal Audit. Any non-implementation will be reported to Information Board.
	d) Produce a set of data breach FAQ's for staff.	November 2022	Not yet started
6. Privacy notices	a) Ensure all activities which involve the collection of personal data have a privacy notice.	December 2022	Privacy notices are being published as and when new systems/ procedures/ data processing is introduced.  A thorough check to ensure all existing activities have privacy notices will be completed as work with individual service areas is progressed as part of the data audit.  SPoC is also involved in the new website project regarding the review of content which will include ensuring privacy notices are in place, relevant and up to date.
	b) Review the council's existing privacy notices to ensure they are up to date.	December 2022	As above- to be reviewed as part of the new website project.
7. Processing activities	a) Update the current list of processing and establish a regular review	January 2023	The template, developed by the ICO, is now populated with the information gathered as part of the 2018 GDPR data audit. Further work is needed to ensure it captures all data processing.
8. Data sharing agreements	a) Develop a central document store of all data sharing agreements, ensuring they are up to date.	Ongoing	<b>COMPLETED</b> Completed data sharing agreements are now held centrally by the SPoC. This does not include historical agreements, and these will be obtained and reviewed as work with individual service areas is progressed as part of the data audit.
	b) Review the list of processing to ensure data sharing agreements are in place where appropriate and	February 2023	Not yet started

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	introduce a process whereby the SPoC is notified of any new agreements.		
9. Freedom of Information and Subject Access Requests	a) Document the procedures for handling FOI and subject access requests, including any charging process.	January 2022	A new system to log and manage subject access and data requests is being developed by the Business Transformation Team. Documented procedures will be produced as part of this process.
	b) Produce data redaction guidance.	February 2021	<b>COMPLETE</b> Redaction guidelines have been produced and training took place on 13 and 14 July 2021.
	c) Look into procuring a redaction tool for Corporate Services	December 2020	<b>COMPLETE</b> Officers within Corporate Services now have access to a data redaction tool.
	d) Roll out the use of an electronic redaction tool to all appropriate officers.	March 2022	Adobe pro has been identified as the preferred tool. Testing has been carried out to ensure data cannot be 'unredacted' and detailed guidance notes produced for users. Ops Managers have been asked to identify staff requiring the tool so that the number of additional licences required can be assessed.
	e) Introduce a reporting process whereby the Information Group receive regular updates regarding requests.	November 2020	<b>COMPLETE</b> The data requests monitoring report, produced by Corporate Services, will be brought to future Information Board meetings.
	f) Develop a clear procedure regarding an individual's right to erasure; including processes to inform other organisations, who the data may have been shared with, of the request.	March 2023	Not yet started
10. Training and awareness	a) Develop a corporate GDPR training plan for officers and councillors.	April 2022	Not yet started
	b) Develop a data protection organisational chart identifying key roles and responsibilities including Information Asset Owners.	July 2022	Not yet started

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	c) Set up an Information Asset Owner email group distribution.	January 2022	Not yet started
	d) Liaise with HR regarding the possible inclusion of data protection responsibilities in job descriptions.	October 2022	Not yet started
	e) Review GDPR intranet page.	June 2022	Not yet started
	f) Work with Communications to develop a GDPR awareness campaign.	May 2021	<b>COMPLETE</b> GDPR branding has now been developed which will be used for any GDPR related comms. The GDPR communications plan has been completed and will be updated moving forward.
	g) Re-launch the online GDPR training	November 2021	<b>COMPLETE</b> Soft launch took place in November 2021. Reminders to be sent out to those that have not completed the modules in the new year.
11. Governance	a) Complete the ICO's data protection self-assessment.	October 2020	<b>COMPLETE</b> Resulted in overall rating being 'green'. It produced a number of suggested actions; all of which are already included within this action plan, with the exception of 1 regarding a clear procedure for the right of erasure- now included as an action (9(e)).
	b) Re-instate the Information Group meetings	November 2020	<b>COMPLETE</b> The Information Group met on 06/10/20 and will meet every 8 weeks moving forward.
12. EU exit	a) Conduct an audit of personal data processing, where the data is received from or sent to a third party.	December 2020	<b>COMPLETE</b> Activities involving the processing of personal data have been identified, including where that data is received from or sent to a third party, as well as that third parties' location e.g., UK, EU etc.

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	b) Identify data flows from the EU to the UK and take appropriate action to implement alternative arrangements where necessary.	April 2021	<b>COMPLETE</b> Data flows have been identified. An adequacy decision has been issued and therefore at present there is no further action the council needs to take.
	c) Identify legacy data relating to EU citizens e.g. data collected prior to 31 December 2020.	April 2021	<b>COMPLETE</b> A risk-based approach is being taken. Discussions with service areas have established that the amount of legacy data held is limited. Where perhaps a larger volume of legacy data will be held is Elections, however this information is updated regularly. It is therefore not considered to be a high risk and there will be a watching brief on developments.
	d) Consider amending existing contracts or reviewing the contractual language for future contracts going forward to ensure they align with UK GDPR (as per MCHLG guidance note on post EU exit preparedness).	September 2022	Not yet started
13. GDPR projects	a) Public registers- data redaction and retention	February 2021	<b>COMPLETE</b>
	b) Information classification	March 2023	Horizon form was taken to Programme Board in June 2021. PIF is due to be presented at the January 2022 meeting.
	c) Data request online system	January 2022	This has been developed and is now in the testing stages.