

# 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 2023	<b>COMPLETE</b> An updated Data Protection Policy was presented to Audit and Governance Committee on 23 March 2023 and subsequently approved by Executive Committee on 7 June 2023. The policy will now be subject to ongoing annual review.
	b) Carry out a review of the council's Breach Reporting Policy.	November 2023	Not yet started
	c) Develop a policy for the use and storage of photographs.	December 2023	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).	March 2024	The 2018 data audit has been reviewed- this identified a number of gaps. Further work is needed with Information Asset Owners on this and will form part of the data retention project referenced at action point 3 (e).
	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.	April 2024	Not yet started
3. Data retention and disposal	a) Review the council's corporate data retention schedule and update as necessary.	July 2024	<i>This action will feed into the corporate data retention project.</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.

# Appendix 1

## GDPR Action Plan

	c) Review data retention in relation to Office 365.	December 2023	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> <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) Develop a retention project plan to include a phased approach to: <ul style="list-style-type: none"> <li>Legacy data</li> <li>Unstructured data</li> <li>Network drives</li> <li>Mailboxes</li> </ul>	December 2023	Not yet started.
	g) Review email distribution lists.	November 2023	Not yet started.
	h) Data held in mailboxes to be migrated onto local network drives. Consider introducing a time limit on inboxes.	July 2024	<i>This action will be completed as part of the retention project referenced at action point 3 (e).</i>
4. Privacy impact assessments	a) Review the existing privacy impact assessment template	January 2024	A new draft DPIA template has been developed and tested, the next step is to develop this into a digital process.  The Data Protection and Digital Bill is due to come into force during late 2023, this may bring potential changes to data protection requirements, including the need for DPIA's. Any further work on the council's existing DPIA template will therefore not commence until the impact of this legislation is known.

## Appendix 1

### GDPR Action Plan

	b) Develop guidance around when a DPIA should be carried out- with reference to the risk management and project management processes.	January 2024	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 attends Programme Board meetings.
	d) Review existing DPIA's to ensure privacy notices and the corporate retention schedule reflect any changes.	March 2024	Not yet started
5. Data breaches	a) Review current practices and documentation in relation to data breaches and determine any areas for improvement.	May 2024	Not yet started
	b) Introduce a reporting process whereby the Information Board receive regular updates regarding data breaches.	November 2020	<b>COMPLETE</b> The Information Governance and Security Board have a data breach update as a standing agenda item.
	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 FAQs for staff.	November 2023	Not yet started
6. Privacy notices	a) Ensure all activities which involve the collection of personal data have a privacy notice.	April 2024	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 and retention project.
	b) Review the council's existing privacy notices to ensure they are up to date.	April 2024	<i>As above- existing privacy notices will be reviewed as part of the data audit and retention project.</i>

## Appendix 1

### GDPR Action Plan

7. Processing activities	a) Update the current list of processing and establish a regular review.	December 2024	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 introduce a process whereby the SPoC is notified of any new agreements.	December 2024	Not yet started
9. Freedom of Information and Subject Access Requests	a) Document the procedures for handling FOI and subject access requests, including any charging process.	February 2024	A new system to log and manage subject access and data requests was launched in October 2022. Documented procedures will now be produced to ensure awareness and consistency in responding to these requests.
	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. Ad hoc training sessions have also been carried out with individual teams as required.
	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	<b>COMPLETE</b> Appropriate officers now have access to a data redaction tool.
	e) Introduce a reporting process whereby the Information Group receive regular updates regarding requests.	November 2020	<b>COMPLETE</b> A data request monitoring report is included as a standing agenda item for Information Governance and Security Board.

## Appendix 1

### GDPR Action Plan

	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 2024	Not yet started
10. Training and awareness	a) Develop a corporate GDPR training plan for officers and councillors.	October 2023	Not yet started
	b) Develop a data protection organisational chart identifying key roles and responsibilities including Information Asset Owners.	July 2022	<b>COMPLETE</b> An Information Governance structure chart has been produced.
	c) Set up an Information Asset Owner email group distribution.	September 2023	Not yet started
	d) Liaise with HR regarding the possible inclusion of data protection responsibilities in job descriptions.	March 2024	Not yet started
	e) Review GDPR intranet page.	December 2023	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> The training was re-launched to staff in November 2021 and refresher modules will be completed on an annual basis. Members are now required to complete the online training as part of their induction programme and annually thereafter.
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

## Appendix 1

### GDPR Action Plan

			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.
	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	<b>COMPLETE</b> All contracts moving forward will now align with UK GDPR provisions.
13. GDPR projects	a) Public registers- data redaction and retention	February 2021	<b>COMPLETE</b> Engagement has taken place with key service areas who will now move forward the developed action plan to publish public registers where applicable.
	b) Information classification	March 2024	An horizon form has been produced for Programme Board and this project will be taken forward once the new Information Governance Officer is in post.

# Appendix 1

## GDPR Action Plan

	c) Data request online system	January 2022	<b>COMPLETE</b> A new system within Liberty Create to manage data requests was successfully launched in October 2022.
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