

APPENDIX 1 - GDPR ACTION PLAN

REQUIREMENT	TASK	START DATE	END DATE	LEAD OFFICER(s)	PROGRESS	Status
Establish a record of personal data processing activities Article 30	Create an information assets register (IAR) and circulate to services	October 2017	May 2018	Kerry Standen	Received responses from most services and they have been incorporated into Register.	In-progress
	Publish IAR as a central record. Services to update when changes occur.	Feb 2018	May 2018	Kerry Standen		Complete
Ensure all staff, Members and suppliers are	Develop a Communications Plan	March 2018	March 2018	Craig Berry	Complete and was agreed at IGG meeting in March.	Complete

aware of GDPR and our new obligations.	Develop E-learning module for all office-based staff, schools staff and Members to complete.	March 2018	May 2018	Craig Berry	E-learning module developed and launched on 21 st May ICT videos also available on intranet.	Completed
	Develop a factsheet for non-office based staff.	March 2018	May 2018	Craig Berry	Completed.	Completed
	Develop a schedule of classroom based sessions for more in-depth training	June 2018		Craig Berry	To be scheduled.	In-progress
Assign DP Officer role Articles 37-39	DP Officer role agreed – Lisa Jones	December 2017	December 2017	SLT	Agreed that Lisa Jones would continue as DCC's DP Officer.	Complete
The Council must have GDPR compliant Privacy Notices	Produce guidance / template on GDPR compliant privacy notices	Jan 2018	March 2018	Craig Berry	Draft guidance developed. Shared with IGG for comments.	Complete

Articles 13 & 14					Published on intranet	
	Services to identify and amend their Privacy Notices based on guidance provided	March 2018		All Services	Services to amend privacy notices using guidance provided. Requirement to amend privacy notices has been included in E-learning module.	In progress
	Update main privacy Notice on website	May 2018	May 2018	Craig Berry	Draft developed and approved by Legal.	Complete
Legal Requirement for Data Protection Impact Assessments (DPIA) to be undertaken for high-risk activities	Raise awareness of the need to undertake DPIA for high risk activities	Jan 2018	May 2018	Craig Berry	Requirement included in ELearning module.	Complete
	Develop a DPIA template and incorporate into DCC's Impact Assessment site	Jan 2018	May 2018	Craig Berry	Template developed as part of regional workings. Has been incorporated into impact assessment framework. Launched 28 th May.	Complete
Article 35						

	Agree a process for reviewing DPIAs.	April 2018	April 2018	Craig Berry and Lisa Jones	Agreed with Lisa Jones and Alan Smith that DPIAs with a residual high risk status would be referred onto them for consideration.	Complete
Where a processor is used to process personal data, a legally binding contract needs to be in place. Articles 28-36	Identify existing contracts involving processing of personal data	February 2018		Helen Makin	<p>Only limited number of contracts are known about and held centrally. Information on these contracts has been circulated to IGG members.</p> <p>Many contracts/arrangements with data processors are not held centrally and are in services.</p> <p>Service asked to send contracts and agreements to Legal to scrutinise.</p>	In progress
	Legal to review contracts and issue	February 2018		Helen Makin	Being undertaken by Helen Makin.	In-progress

	contract variations, where applicable.					
	For new suppliers – amend standard T&C’s and procurement process to include guarantees that suppliers can comply with new data protection requirements	April 2018	May 2018	Helen Makin	New Ts & Cs developed and incorporated into procurement process.	Complete
Ensure personal data is kept for no longer than necessary	Raise awareness of retention schedule in areas where there is uncertainty on retention rules.	Jan 2018		Craig Berry	On-going	In progress
Article 17	Make Schedule more user-friendly	Dec 2017	May 2018	Craig Berry	New more user-friendly format for Retention Schedule published	Complete
	Retention rules incorporated into emails	Feb 2018	Dec 2018		Retention policies to be agreed with IGG and SLT.	In progress

					Draft proposals shared with IGG for comments.	
Mandatory requirement to inform ICO of serious breaches Articles 33 & 34	Raise awareness across Council of the legal requirement to inform ICO and data subjects of serious breaches.	April 2018	May 2018	Craig Berry	To be included in ELearning, which will be launched in May.	In progress
Data Subjects Rights	Amend SAR process to take into account changes in timescales and fees.	May 2018	May 2018	Kerry	Changes incorporated into SAR process and database.	Complete
Insurance and compensation	Arrange appropriate insurance to cover costs for fines and personal claims	Feb 2018	March 2018	Craig	Checked with Chris Jones. Fines are paid for by Council. Claims paid for by insurance.	Complete