GDPR Compliance Report – Appendix A

GDPR PROJECT PLAN – SUMMARY

Due by:	Tasks	Status
	Establish CMT support for a GDPR compliance project: – Resources (people, money, time) – Top management support (tone from the top)	Completed 14/06/17
	Establish a GDPR Project Team	Completed 24/07/17
31/10/2017	Carry out Data inventory & Identify high risk data flows / databases	Completed 15/11/17
31/10/2017	Create a Communications strategy	Completed 21/11/17
30/11/2017	Identify other already-implemented standards, frameworks or management systems that may be impacted or could contribute to GDPR	Completed 24/11/17
30/11/2017	Consider the GDPR data retention implications of the ten year retention of emails in Mimecast	Completed 06/12/17
30/11/2017	Review security controls and breach reporting processes currently in place	Completed 24/11/17
30/11/2017	Identify Internet-facing IP addresses and URLs: – Ensure there are up-to-date penetration tests – Ensure there is an effective plan for vulnerability remediation	Completed 24/11/17
31/12/2017	Consider moving to 100% electronic record keeping systems throughout the council including back-scanning exercises and limited access to service staff for self-scanning	In progress
31/01/2018	Identify all privacy notices currently in use and confirm areas where privacy notices should be used	High Risk Services completed 09/01/18 All other Services – In Progress
31/01/2018	For ALL HIGH RISK SERVICES Carry out Data Mapping & Data Flow Audit to: • Identify all data processing activities, personal data sources and the basis on which we are collecting and using personal data. • Establish the process for recording all personal data processing actives • Consider if the personal data being collected is adequate, relevant and limited to what is necessary • Confirm whether data can be corrected, or erased • Identify the retention and disposal of	All High Risk Services Deep Dive meetings completed 09/01/18

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	data • Confirm if processing data relating to children applies in UDC data processing activities • Identify all service areas where consent is used for processing.	
31/01/2018	For HIGH RISK SERVICES establish the current Data Subject Access Request (SAR) process	In progress
31/01/2018	For HIGH RISK SERVICES identify and prioritise necessary contract reviews where personal data is shared e.g. with payroll providers; contractors; partners; cloud based organisations	In progress
28/02/2018	Draft Article 13 and Article 14 Privacy Notices	In progress
28/02/2018	Carry out Data Gap Analysis on all services	In progress
28/02/2018	Carry out Data Protection Impact Assessments where required	In progress
28/02/2018	If data is being transferred outside the UK: Confirm if this applies to any of the Council's processing activities Identify which entities will be in scope: – Business units, territories, jurisdictions – Interfaces and dependencies – identify third party relationships in which the council is the processor or controller – Identify contract managers for them all Assess detailed compliance with – Data privacy principles – Requirements on controllers and processors – Appropriate technical and organizational measures – Trans-border data flows	In progress
28/02/2018	For ALL OTHER SERVICES Carry out Data Mapping & Data Flow Audit • Identify all data processing activities, personal data sources and the basis on which we are collecting and using personal data • Establish the process for recording all personal data processing actives • Consider if the personal data being collected is adequate, relevant and	In Progress

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	limited to what is necessary • Confirm whether data can be corrected, or erased • Identify the retention and disposal of data • Confirm if processing data relating to children applies in UDC data processing activities • Identify all service areas where consent is used for processing.	
28/02/2018	For ALL OTHER SERVICES establish the current Data Subject Access Request (SAR) process	
28/02/2018	For ALL OTHER SERVICES identify and prioritise necessary contract reviews where personal data is shared e.g. with payroll providers; contractors; partners; cloud based organisations	In Progress
31/03/2018	Designate the Role of Data Protection Officer	
31/03/2018	Establish procedure to ensure appropriate privacy notices are in place for all new data collection and processing	
31/03/2018	Review and update Document Retention Policy and Schedule, including procedures for appropriate erasure, anonymisation or pseudonymisation techniques.	
31/03/2018	Establish procedures to ensure the safe transfer of data	
31/03/2018	Establish procedures for obtaining consent from Children for aged 16 (13) and above and for obtaining parental or guardian consent for Children under 16 (13)	
31/03/2018	Ensure that consent is a positive action and can be easily withdrawn	
31/03/2018	Implement a process for logging, evaluating and responding to all requests for information, ensuring decision letters are drafted to include retention period, legal basis of processing and how to have data corrected.	
30/04/2018	Regular briefings to CMT, SMT and Members	In progress
30/04/2018	Ensure staff are trained in the Data Subject Access Request (SAR) process	
30/04/2018	Publish reviewed and updated Data Protection Policy	

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30/04/2018	Ensure that the website is amended to reflect new Data Subject Rights.	
30/04/2018	Ensure that the website is amended to reflect new SARs timescale and charging/exemption rules.	
30/04/2018	Establish Incident response and breach reporting process – Integrate with existing service desk/helpdesk processes – Integrate with existing business continuity processes	
30/04/2018	Incorporate data protection risk into corporate risk management and internal control framework.	
30/04/2018	Establish procedures to ensure Data Protection Impact Assessment (DPIA) are undertaken as required in GDPR	
30/04/2018	Establish Data Protection by Design through involvement of the DPO at early stages of all projects, new processes and procedures where data processing is concerned	
30/04/2018	Establish Records of processing activities compliance statements	
30/04/2018	Raise Staff Awareness - Cover all staff within scope - Reflect contract negotiations - Regular staff awareness and briefings – Integrate with Cyber Security Staff awareness – Consider e-learning for staff awareness - Administrative aspects i.e. proof of attendance, proof of knowledge	
30/04/2018	Ensure all staff are trained in incident response and breach reporting procedures	