

Appendix A - GDPR Action Plan

Outcomes	Key Tasks	Progress to Date
Communication/Awareness/Training		
Staff and members are aware of the key changes and revised procedures and their responsibilities. A regular training approach & programme identified to ensure ongoing training.	Organise the delivery of training in the legislative changes, new procedures and responsibilities to all staff & members	GDPR Presentations made to managers at manager's meetings. GDPR training and additional guidance delivered to all members. GDPR E-Learning modules rolled out to all staff. To date 384 staff have completed the on-line training out of a possible 650 (150 staff are manual workers with little access to personal data). HR have produced a list of staff who have not completed the E-Learning modules so they can be chased.
Data Protection Officer Role		
Appoint a Data Protection Officer (reports directly to senior management, has no conflict of interests, can be provided by an outside body).	Work with SLT to identify how & where the DPO role fits within the new operating model.	DPO role now being shared with South Somerset District Council (SSDC) from 1st October 2018. Our new DPO is Jan Gamon who is based at SSDC.
Information Assets		
A detailed and up to date record of: WHAT information data we hold (personal and special categories of data) WHY we hold it (legal basis) WHERE we hold it and in what form HOW LONG (retention period)	Document and implement procedures to ensure the regular review and update of the IAR.	An IAR has been set up and we have started to complete this. The completion of the IAR has now been picked up by the Information Management Project which is being managed by our ICT Manager Fiona Kirkham.
Information Management Future Approach		
A new approach to Information Management which supports the delivery of the new operating model & GDPR compliance and which delivers a simple, intuitive and easy to manage approach to creating, storing accessing, disclosing, retaining and deleting ALL information and data held by the councils.	Implement our new approach to Information Management including procedural and technology changes including a new Document Management System.	Separate Info Man project commissioned & being managed by Fiona Kirkham
	Identify and implement a plan for all legacy information and data.	Separate Info Man project commissioned & being managed by Fiona Kirkham
Consent		
We have a clear and transparent approach to consent which: > Identifies where we are relying on implied consent > Allows customers to give and withdraw consent, where necessary > Enables and aligns with our new ways of working	Review, update and implement our privacy and Fair Processing Notices to comply with GDPR and to align with our future ways of working (NB will need to be undertaken in conjunction with the Transformation Team)	Main Privacy Notice on WSC website has been updated and amended for GDPR. Some specific privacy notices for our different functions (ie Revenue and Benefits, Elections, Planning and one for councillors) have also been added. More will be added in the coming weeks and months.
	Implement procedural and technical changes to ensure we are obtaining positive consent (where consent is required) to allow us to process personal data	Initial areas where specific consent is required (Comms, Ec Dev, Tourism etc have been identified and consulted. Comms sent letters out to all contacts asking if they wanted to remain on our contact list. Tourism have set up an 'Opt In' facility on their web site. Business Processing Re-engineering (BPR) team have been made aware of the need for consent on specific processes.
	Implement procedural and technical changes to allow us to automatically cease the processing of personal data where consent is withdrawn (NB this may require the removal of links to certain data or the deletion of data)	To be delivered as part of the development of Firmstep through the BPR process.

Outcomes	Key Tasks	Progress to Date
Data Retention & Deletion		
We are clear on how long we should retain each piece of personal data and have procedures in place for the proactive deletion of data once the retention period has expired	Work with each of our line of business system providers to identify and implement any changes required to ensure compliance with our retention & deletion obligations. (NB. This exercise will include identifying any costs associated with making these changes)	Info Man Project now commissioned which has picked this up.
	Identify data held in other areas i.e. paper records, e-mails, network drives etc. & implement procedural & technology changes to ensure compliance with our retention & deletion obligations. (NB. The solutions for these other areas will be identified as part of our future approach to Information Management as outlined above)	Info Man Project now commissioned which has picked this up.
Privacy by Design (Privacy Impact Assessments)		
Clear procedures in place which ensure that Privacy Impact Assessments are undertaken in respect of any new projects or procedural changes that involve personal data to ensure that the use of this data is appropriate, complies with GDPR and that proper safeguards are in place	Draft and implement a procedure (including a procedure to ensure ongoing compliance) to ensure that Privacy Impact Assessments are pro-actively carried out for any changes involving the processing of personal data (NB this will need to be built into the Transformation Project BPR process)	DPIA form produced & added to the intranet along with a DPIA toolkit to help managers complete these. Completed DPIA forms are now kept on the intranet.
Subject Access Requests		
The SAR process complies with the new legislation (ie no fee and 1 month response time). In the longer term to develop this as a self-service function.	Monitoring SAR's & our responses post 24 May 2018	New and separate SAR Database/record created on Intranet. New response letters created with revised reply times. Only received about 7 SARs so far since GDPR came in on 25th May 2018.
	Work with the Transformation Project Team to develop as a self-service function in the longer term.	Currently working with BPR Team regarding a new self-serving function via Firmstep.
Contracts		
Ensure that future and renewed contracts comply with the new regulations and provide sufficient protection for the councils.	Identifying all existing contractors and/or organisations processing data on our behalf an ensuring that we have appropriate contractual arrangements in place	All known contractors/suppliers contacted by standard letter re new GDPR guidelines in May and replies received. Procurement Team were currently working through these responses.
Information Sharing		

Outcomes	Key Tasks	Progress to Date
<p>Ensure that we have a clear data sharing agreements in place with every organisation with whom we share personal data and that these agreements:</p> <ul style="list-style-type: none"> > Are clearly written > Comply with GDPR > Set out what data is being shared and what it is used for > Clearly defined roles 	<p>Review, update and agree with suppliers/third parties revised data sharing agreements.</p>	<p>Partnership Register updated. Currently working through this and our existing Data Sharing Agreement and Contract list to identify any gaps. Where gaps exist then DSAs will need to be drawn up with the relevant organisations. Any new organisations that are identified where we share personal data will require a DSA.</p>
Data Breach Management		
<p>Implement changes to the data breach procedure to ensure compliance with the new legislation (i.e. the 72 hour timeline).</p>	<p>Update our procedures and communicate to staff, members and third party organisations.</p>	<p>Data Breach Policy has been updated and communicated to staff and is now on the intranet.</p>
	<p>Review the scoring mechanism in the Breach Procedure to ensure it reflects the GDPR requirements</p>	<p>The current scoring mechanism used to assess data breaches is currently being revised so it is compliant with GDPR.</p>
Data Protection Policy		
<p>Our Data Protection Policy and associated procedures are compliant with the new regulations.</p>	<p>Review and update the Data Protection Policy and procedures to ensure compliance with the new regulations (NB need to ensure alignment with our future operating model and Information Management Architecture)</p>	<p>A new Data Protection Policy was published for both councils back in June 2018.</p>