

**MORETON-ON-LUGG PARISH COUNCIL**

**GDPR ACTION PLAN (Version One) – 28<sup>th</sup> April 2018**

<b>Requirement</b>	<b>Recommendation</b>	<b>Action</b>	<b>Ownership</b>	<b>Completion Date</b>	<b>Progress</b>	<b>RAG Rating</b>
<b>Awareness</b>	Ensure key decision-makers are aware of the law changing to the GDPR	Report to Full Council	Clerk	May-18	Report to be submitted to Council for information.	
	Ensure key decision-makers are aware of likely impact, particularly in areas likely to cause compliance problems	Report to Full Council	Clerk	May-18	Report to be submitted to Council for information.	
	Ensure key decision-makers are aware of resource implications for achieving compliance	Report to Full Council	Clerk	May-18	Report to be submitted to Council for information.	
<b>Undertake a Personal and Information Audit</b>	Document where personal data is held.	Carry out personal data audit	Contractor	Apr-18	Audit commissioned and in draft form.	
	Document where the data originated from.	Carry out personal data audit	Contractor	Apr-18	Audit commissioned and in draft form.	
	Document with whom the data is shared.	Carry out personal data audit	Contractor	Apr-18	Audit commissioned and in draft form.	
<b>Data Protection Policy</b>	Update existing policy or adopt a new policy	Develop revised policy	Clerk	May-18	Draft developed. Needs to be adopted by Council.	

<b>Privacy Notices</b>	Review privacy notices and update to include the requirement to explain in a short, simple and clear manner the legal basis for processing data, data retention periods and the right to complain to the ICO. Privacy notices aimed at children must be written so that a child can understand it.	As part of the Information Audit identify what is in place and where notices need to be updated. Further identify areas where no privacy notice is being used and develop notices as required	DPO and Clerk	May-18	Drafts have been developed. To be included on relevant forms as from 25/05/18	
<b>Individuals' Rights</b>	Policies and procedures should be checked to ensure they cover how to properly manage a request from an individual seeking to exercise their GDPR rights, including rights to correct inaccurate data, request to see their information and to preventing profiling.	Develop policy to update personal information, erasure, restriction and rectification. Prevent profiling.	DPO and Clerk	May-18	Draft developed. Need to be adopted by Council.	
<b>Subject Access Requests</b>	Update policies and procedures to handle new GDPR features in relation to subject access requests, to meet new deadline of one month, and -	Update as part of the Data Protection Policy and adopt a procedure for Subject Access Requests	DPO and Clerk	May-18	Draft developed. Needs to be adopted by Council.	
	Providing data subjects with extra information, such as on data retention periods and on their right to have inaccurate data corrected	Develop letter templates for writing to requesters in relation to subject access requests	DPO and Clerk	May-18	Draft developed. Needs to be adopted by Council.	

	Manifestly unfounded or excessive requests may be charged for or refused, so clear policies to justify such decisions should be created.	Update as part of the Data Protection Policy and adopt a procedure for Subject Access Requests	DPO and Clerk	May-18	Draft developed. Needs to be adopted by Council.	
	Conduct a cost-benefit analysis for providing data subjects with online access to their information.	Carry out a cost benefit analysis	DPO and Clerk	May-18	To be reviewed in-house to assess potential cost	
<b>Legal Basis for providing personal data</b>	Examine the types of data processing the council carries out.	Personal Data Audit	DPO and Clerk	May-18	Audit undertaken & recommendations contained within report.	
	Document the legal basis for carrying out each type of processing (broadly the same as those in the DPA), which will also assist with meeting GDPR accountability requirements.	Personal Data Audit	DPO and Clerk	May-18	Audit undertaken & recommendations contained within report.	
<b>Consent</b>	Review how consent is sought, obtained and recorded.	Personal Data Audit	DPO and Contractor	May-18	Audit undertaken & recommendations contained within report.	
	Consider whether alterations or alternatives to consent mechanisms are necessary to meet the GDPR requirements and to provide an audit trail for demonstrating consent.	Personal Data Audit	DPO and Clerk	May-18	Audit undertaken & recommendations contained within report.	

<b>Children</b>	Organisations should consider systems to use for verifying individuals' ages and to obtain parental or guardian consent, which the GDPR will require to lawfully processing a child's data.	Personal Data Audit	DPO and Clerk	May-18	Audit undertaken & recommendations contained within report.	
<b>Data Breaches</b>	Ensure procedures are in place to detect, report and investigate a personal data breach, and report them to the ICO under new mandatory reporting if they reach a certain threshold.	Data Protection Policy and develop a data breach procedure as a separate policy	DPO and Clerk	May-18	Draft developed. Needs to be adopted by Council.	
	Document the types of personal data held which would fall within a notification requirement.	Personal Data Audit	DPO and Clerk	May-18	Audit undertaken & recommendations contained within report.	
<b>Data Protection by Design</b>	Adopt a privacy by design and data minimisation approach to all activities involving data processing, as this will be compulsory under the GDPR	Update as part of the Data Protection Policy and adopt a procedure for Subject Access Requests	DPO and Clerk	May-18	Draft developed. Needs to be adopted by Council.	
<b>Impact Assessments</b>	Assess situations where it will be necessary to conduct a PIA (that is, where data processing is high risk, for example, where a new technology is being used or the commencement of a new project/service). Determine who will conduct it and who needs to be involved.	Include in data protection policy. Separate procedure and PIA template has been developed.	DPO and Clerk	May-18	Draft developed. Needs to be adopted by Council.	

<b>Data Protection Officer</b>	Designate a Data Protection Officer.	Appoint a DPO and provide sufficient support to enable role to be undertaken	Clerk	May-18	DPO appointed.	
	Ensure the Data Protection Officer is appropriately qualified, effectively supported and has appropriate authority within the organisation.	Provide appropriate training, assess support required and ensure the DPO has the necessary authority.	Clerk	May-18	DPO meets requirements.	
	Decide where the Data Protection Officer will fit within the organisation's governance structure.	Develop protocol to outline who the DPO will report to (staff Committees/Council)	Clerk	May-18	Contractor DPO will liaise with Clerk and Council as required.	
<b>International</b>	Determine which data protection supervisory authority applies to it, if it operates internationally. This will depend on where its "main establishment" is, that is, where its main administration is located or where decisions about data processing are made.	The Council does not operate internationally. Assess how data storage on cloud based systems may be affected regarding EU and international data protection standards and agreements.	DPO and Clerk	May-18	Completed	
<b>Training &amp; Awareness</b>	Provide training and awareness to all staff on new regulations.	Provide as appropriate	DPO and Clerk	June-18	To be considered and implemented.	
	Provide training and awareness to all Councillors on new regulations.	Provide as appropriate	DPO and Clerk	June-18	To be considered and implemented.	

<b>Contracts</b>	Update contract templates for compliance with GDPR	Future contracts to include GDPR compliance template	DPO and Clerk	May-18	Draft developed	
	Notify existing suppliers as appropriate that they must now be compliant with GDPR	Seek confirmation from all suppliers.	DPO and Clerk	May-18	Draft developed	