Appendix 1: Overview of Readiness Approach

The Council's readiness approach has been built around the requirements of the General Data Protection Regulation, in order to implement the necessary measures so the Council can proactively demonstrate compliance in accordance with GDPR's Accountability Principle. **Appendix 1** contains further information on the General Data Protection Regulation and the key changes.

The Council operates within a complex and interrelated landscape of statutory duties, statutory powers and discretionary services, provided in the public interest, and in accordance with our strategic priorities. In achieving these outcomes, we work with a wide range of partners in the public, private and third sector, which creates relationships where data needs to be shared to meet our objectives, and where data ownership can sometimes be difficult to tease out.

The Council's own information and data landscape is equally complex, with a wide range and number of IT and manual systems in use where personal information is processed.

All Council staff will process personal information at some point in the course of doing their jobs, which means that everyone needs to understand what their responsibilities are in relation to personal data, and how they fulfil them in practice. The diversity of roles and specialisms we have working for the Council means that business areas may have differing practical

In the light of this, and in accordance with the Council's framework for managing the appropriate use and governance of the Council's information and data, as approved at Audit, Risk & Scrutiny Committee in September 2016, the Council's readiness approach focusses on the following key areas:

- Information & Data
- Systems & Processes
- People & Behaviour

Information & Data

The foundation to the Council's compliance with existing and future data protection law is knowing our data: we need to know what it is we hold, where it is, why we hold it, how we use it, who we share it with and how long we keep it.

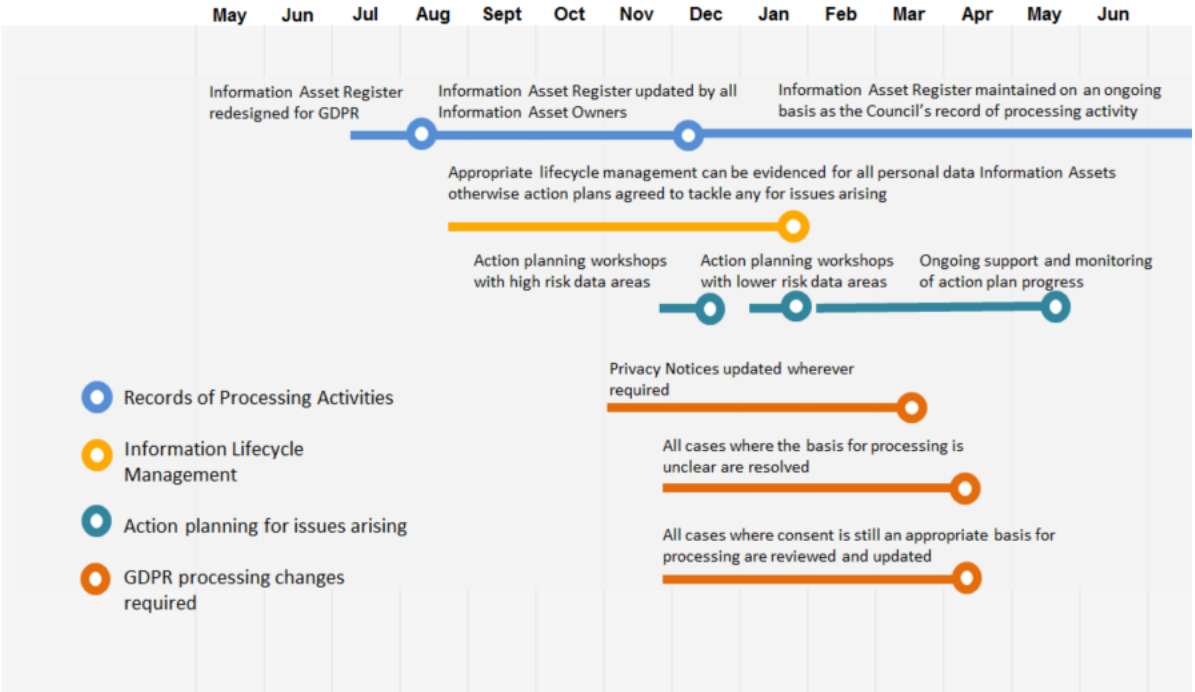
The Council must be able to evidence that all of our personal information and data is processed in compliance with the data protection principles, and the other requirements of data protection law, including the rights of data subjects.

Processing includes all activities undertaking with personal data including, creating, using, sharing and disposing of it. For the Council to have good assurance around the processing of all types of personal data, we need to ensure that all relevant information assets can evidence having the appropriate information lifecycle management arrangements in place.

This includes making sure compliant privacy notices, access and security arrangements, information sharing and appropriate contractual arrangements with third parties, including partners, and appropriate retention and disposal arrangements are in place around all information assets which contain personal data.

Because of the fundamental importance of this area and the complexity of the Council's existing information and data landscape, a significant amount of resource has been invested in training and supporting the Council's third tier managers (Information Asset Owners) to evidence that the information and data assets that they are responsible for are managed in accordance with the required standards.

Figure 1: Information & Data Overview of key readiness activities

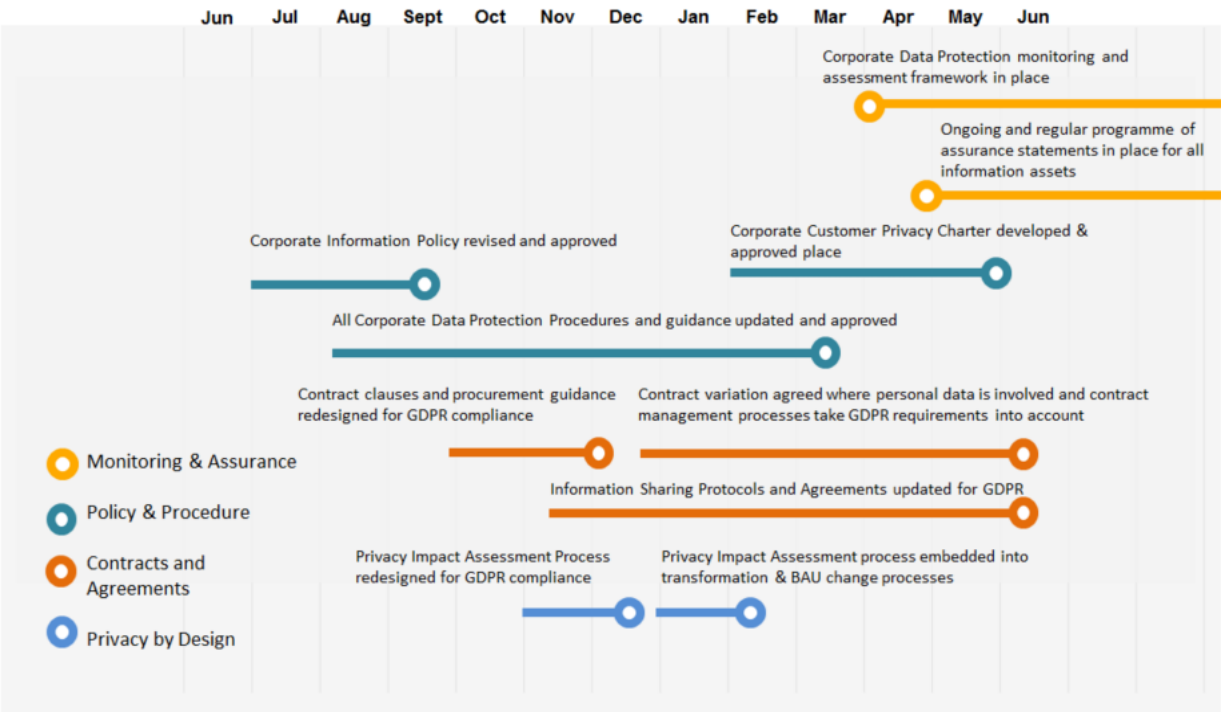


Systems & Processes

In addition to the measures required at Information and data level, as outlined above, the Council requires to have the right systems and processes at a corporate level to ensure GDPR compliance. This includes policy and procedure, contractual and sharing arrangements, change management processes and an appropriate ongoing monitoring and assurance framework.

The chart below outlines the key activities being undertaken to ensure that the Council can evidence compliance with the GDPR requirements:

Figure 3: Overview of key systems and processes key readiness activities

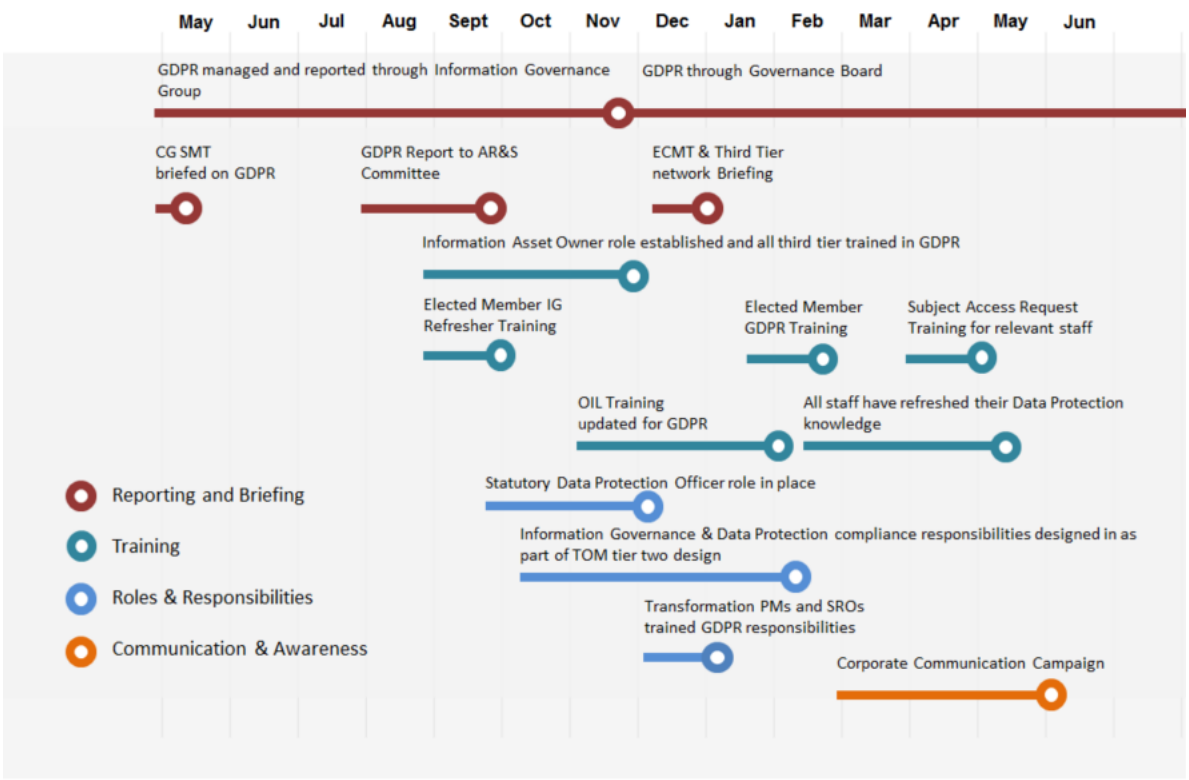


People & Behaviour

Making sure that everyone who handles or making decisions about personal data understands what their part is, and how they play it is as important as having the right systems and processes in place.

The chart below outlines the key activities being undertaken to ensure that the Council can evidence compliance with the GDPR requirements:

Figure 3: Overview of key people and behaviour readiness activities


May
Jun
Jul
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Sept
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May
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GDPR managed and reported through Information Governance Group
GDPR through Governance Board
CG SMT briefed on GDPR
GDPR Report to AR&S Committee
ECMT & Third Tier network Briefing
Information Asset Owner role established and all third tier trained in GDPR
Elected Member IG Refresher Training
Elected Member GDPR Training
Subject Access Request Training for relevant staff
OIL Training updated for GDPR
All staff have refreshed their Data Protection knowledge
Statutory Data Protection Officer role in place
Information Governance & Data Protection compliance responsibilities designed in as part of TOM tier two design
Transformation PMs and SROs trained GDPR responsibilities
Corporate Communication Campaign
Reporting and Briefing
Training
Roles & Responsibilities
Communication & Awareness