

### Appendix C - Action Plan

Action	GDPR area	Start Date	End Date	Responsible
Identify High Priority Services	All	Aug-17	Aug-17	Anna Collier
Review resources to implement GDPR changes	All	Aug-17	Aug-17	Anna Collier/Angela Woodhouse
Identify Training and other support resources	All	Aug-17	Sep-17	Anna Collier/Angela Woodhouse
Undertake Information lifecycle audits with all services reviewing all processes. Looking at: Collection, processing, sharing, storage, security, retention and disposal - this will	All	Oct-17	Feb-18	Anna Collier
Implement action plans from information lifecycle audits	All	Nov-17	May-18	Alex Munden
Review Retention Schedule	Individual's Rights	Aug-17	Feb-18	Anna Collier/Alex Munden/Legal
Ensure every Service has retention periods documented	Individual's Rights	Aug-17	Feb-18	Service Managers Monitored Alex Munden
Design Robust Lifecycle Audit Form that clearly identifies the lawful basis for processing	Lawful Basis for processing data	Aug-17	Aug-17	Anna Collier
Ensure every process documents the lawful basis for processing	Lawful Basis for processing data	Oct-17	Feb-18	Service Managers/Anna Collier/Angela Woodhouse
Lifecycle Audits	Children	Oct-17	Feb-18	Anna Collier
Lifecycle Audits	International	Oct-17	Jan-18	Anna Collier
Review and update Data Protection Guidance and Need to Know fact sheets for GDPR	Awareness	Oct-17	Feb-18	Alex Munden
Briefing for CLT	All	Sep-17	Apr-18	Angela Woodhouse and Anna Collier
Training for Revs and Bens	All principles	Sep-17	Sep-17	T Wells
Review Data Retention Scheme	Information We Hold	Oct-17	Feb-18	Anna Collier
Update any processes and procedures as per recommendations from lifecycle audits (included and monitored in audit action plan)	Individual's Rights	Sep-17	Apr-18	Delivered by Service Managers Monitored by Alex Munden
Work with the ICT team to ensure that any digital barriers to the accessing of information are identified and explored	Individual's Rights	Sep-17	Apr-18	Anna Collier/Chriswoodward
Design guide to consents (internal and external document)	Consent/Awareness	Sep-17	Oct-17	Alex Munden
Design and Implement DPIA process	Data Protection by Design and Data Protection Impact Assessments	Sep-17	Oct-17	Anna Collier
Create DPIA guidance and DPIA Need to Know	Data Protection by Design and Data Protection Impact Assessments	Sep-17	Oct-17	Alex Munden
Report to CLT with recommendations for the appointment of the DPO	Data Protection Officer (DPO)	Sep-17	Sep-17	Anna Collier/Angela Woodhouse

Training for high risk service areas - those who process large volumes of personal and/or sensitive data	All principles	Oct-17	Feb-18	Angela Woodhouse
Briefing for Unit Managers and Staff Forum	All principles	Oct-17	Apr-18	Angela Woodhouse
Update Information sharing checklist and log	Information We Hold	Oct-17	Oct-17	Alex Munden
Update consents (included and monitored in audit action plans and website reviewed and updated)	Consent	Oct-17	May-18	Delivered by Service Managers Monitored by Alex Munden Digital Support Paul O'Grady
Briefing for WLT	All principles	Oct-17	Apr-18	Angela Woodhouse
Design standard template for presenting Privacy Notices. These should be clear concise and easy to understand	Communicating Privacy Information	Nov-17	Jan-18	Helen Bell/ Anna Collier
Review and update guide to privacy notices (internal and external document)	Communicating Privacy Information/Awareness	Nov-17	Jan-18	Alex Munden
Update Privacy Notices (including a review of the website and update) (included monitored in audit action plans)	Communicating Privacy Information	Nov-17	Apr-18	Paul O'Grady
Review and Investigate Data Portability Requirements	Data Portability	Nov-17	Dec-17	Anna Collier
Review and update information Asset Register	Individual's Rights	Dec-17	Jan-18	Service Managers/Alex Munden/Anna Collier
Review procedures for subject access requests process	Subject Access	Mar-18	Mar-18	Alex Munden
Update SAR request form and SAR checklist	Subject Access	Mar-18	Mar-18	Alex Munden
Review and update SAR guidance and SAR 'Need to know'	Subject Access	Mar-18	Mar-18	Alex Munden
Review Data Breach Process and update procedures	Data Breaches	Apr-18	Apr-18	Alex Munden
Update Data Breach guidance	Data Breaches	Apr-18	Apr-18	Alex Munden
Create Need to Know- Data Breaches	Data Breaches	Apr-18	Apr-18	Alex Munden
Update Website with details of DPO	Data Protection Officer (DPO)	May-18	May-18	Anna Collier
Produce GDPR Guidance/Training for Members	Awareness	Jan-18	Jan-18	Sam Bailey/Alex Munden