

Maidstone Borough Council

Data Protection Action Plan

Last Updated: 03 November 2022

Ref No.	Action	ICO Description	Priority (RAG)	Start Date	End Date	Responsible	Status	Commentary November 2021	Commentary November 2022
DP01	All data protection, records management and information security policies need to be reviewed and updated.	Policies should: clearly outline roles and responsibilities, be easily available and sign posted, have a clear review date. Review use of consents information sharing, information risk, data breaches, DPIAs.	High	17/11/2020	31/12/2020	Data Protection Officer	Complete	Policies reviewed. DPAS carrying out review as part of CCTV. Refer to ICO Self Assessment.	All policies have been reviewed and arrangements are in place to review these every three years. The next review will be in 2023. This action has now been marked as complete.
DP02	Operational guidance and procedures needs to be reviewed and updated.	Procedures should clearly outline roles and responsibilities, internal and external transfer of data be easily available and sign posted, have a clear review date, introduce new procedures around method of recording individual's right to dispute Whilst privacy notices and statements are updated processes aren't in place to update customers in these circumstances. Review consents, review information sharing, DPIAs, data breaches.	High	17/11/2020	31/12/2020	Data Protection Officer	Complete	Guidance and procedures updated and published on the intranet.	All guidance has been reviewed and arrangements are in place to review these every three years. The next review will be in 2023. This action has now been marked as complete.
DP03	Promote updated policies and guidance for staff.		Medium	04/01/2021	31/01/2021	Deputy Data Protection Officer	Complete		Included as part of Data Protection Week in January 2022. This action has now been marked as complete.
DP04	Explore ways of recording that staff have read policies and procedures.		Medium	01/12/2020	31/12/2020	Data Protection Officer	In Progress	System is currently being explored which would allow for recording.	Two systems have been reviewed, however currently the cost outweighs the benefit to the organisation. Alternative creative activities could be explored, to allow staff to test and engage their knowledge from policies.
DP05	Data protection pages to be made more visible.		Medium	04/01/2021	31/01/2021	Information Governance Officer	Complete		
DP06	Job descriptions for MG, AW, AC, OS and LC need to be updated.		Medium	16/11/2020	30/11/2020	Senior Information Risk Owner	Complete		Completed during restructure in 2021. This action has now been marked as complete.
DP07	Create dashboard to monitor data protection activity.		Medium	01/11/2020	31/03/2020	Data Protection Officer	Complete		
DP08	Review Logs to ensure best practice - Rights Requests, Information Sharing, DPIA and Data Breach need to be reviewed.		High	17/11/2020	30/11/2020	Deputy Data Protection Officer	Complete	System is currently being explored which would allow for recording. DPAS is looking at information sharing.	All logs have been reviewed and updated to reflect best practice. This action has now been marked as complete.
DP09	Recording Processes to be reviewed to ensure they can be handed over to new staff or other team members if required.		Low	17/11/2020	31/12/2020	Information Governance Officer	Complete		Standard operating procedures have been produced and shared with the Information Governance Team. This action has been marked as closed.
DP10	Rolling agenda to be introduced for Operational Data protection meetings.		Medium	07/10/2020	07/10/2020	Data Protection Officer	Complete		
DP11	Action Points of operational meetings to be kept and reviewed each meeting.		Medium	22/10/2020	22/10/2020	Information Governance Officer	Complete		
DP12	Develop data protection training programme including specialist training, induction training, eLearning, managers briefings, team talks and adhoc team briefings.	Training should: Cover individuals rights, DPIA, consents, information sharing, privacy, information security, data breaches. Be developed with Learning and Development Mgr. Cover a mixed learning approach. Be signed off by WLT. Roles where training should be specialist should be identified, If you obtain personal data from a source other than the individual it relates to, privacy information is provided to individuals within a reasonable period no later than one month of obtaining the data.	High	04/01/2021	31/03/2021	Deputy Data Protection Officer	Complete	eLearning is in place, speciality training for information sharing.	An external consultant delivered specialist information sharing training to departments between May-July 2022. A bespoke session on keeping personal data safe was delivered in house in January 2022, to align with Data Protection Day. Refresher training on information governance, tailored to departments, has been on-going since May 2022. The training is scheduled to be completed by December 2022. This action has now been marked as closed.
DP13	Undertake programme of information audits.	Audits should include: an audit of all forms to ensure privacy statement is correct, an audit of privacy notices, an audit of all systems to review progress in erasure, anonymisation, introduce regular survey as part of the programme of ongoing audits. Review use of consents, and audit of the asset register, and agreements with any third parties used to transfer business information between your organisation and third parties. Audits should added to the agenda for operational meetings and information management group, the ROPA should be updated alongside the audits .	Low	01/01/2023	31/12/2023	Deputy Data Protection Officer	Not Started	Postponed. Looking at next year for this to cover physical and electronic data.	The project plan for this is being currently being produced. The plan will be finalised and presented to the Data Protection Operational Team in December 2022, in preparation for commencement in 2023. Start and end dates revised to reflect this.
DP14	Redesign privacy notice.	Design of Privacy Notices should consider: User testing, Electronic and hard-copies, using a combination of appropriate techniques, such as a layered approach, icons and mobile and smart device functionalities.	High	07/12/2020	28/02/2021	Deputy Data Protection Officer	Complete		A new template for privacy notices was agreed by the Data Protection Operation Team June 2022. As data protection review are completed departments will be moved over to the new format. This action has now been marked as closed.
DP15	Audit Privacy Notices.	Privacy Notices should be: held in a structured way, including log of former Privacy notices. Review use of consents	Medium	01/01/2023	31/12/2023	Data Protection Officer	Not Started		This will be combined with the programme of information audits. Start and end dates revised to reflect this. Refer to action DP13.

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DP16	Introduce new measures in leadership team to ensure projects with Data Protection Risks are identified.		High	07/11/2020	31/01/2021	Senior Information Risk Owner	Complete		Information Governance Reports are provided to CLT mid year and annually.
DP17	Develop regular programmed points of review of the ROPA in line with audits and survey of officers.		Medium	01/01/2023	31/12/2023	Data Protection Officer	Not Started		This will be combined with the programme of information audits. Start and end dates revised to reflect this. Refer to action DP13.
DP18	Review Procurement and Data Protection risks.		Medium	TBC	TBC	Data Protection Officer	Not Started		External advice being sought.
DP19	Develop information Risk Register.		Low	16/11/2020	28/02/2021	Data Protection Officer	Not Started	External advice being sought. Include in corporate risk register.	Project delayed due to change in staff in Mid Kent Audit. Project hasn't been revisited due to reprioritisation of work. Re timetabled for mid/late 2023.
DP20	Project documentation should be updated to include reference to DPIAs.		Medium	TBC	TBC	Data Protection Officer	Complete	To be undertaken as part of transformation review.	Completed however more work is required as part of culture change activities to ensure staff consider DPIA at earliest opportunity
DP21	Publish DPIAs on website.		Low	01/11/2022	31/03/2024	Deputy Data Protection Officer	Not Started		New DPIA templated agreed in October 2022. All current DPIAs are scheduled to be reviewed by 31/03/2022. Arrangements for publishing DPIAs, including criteria, process and format is planned for 2023-2024. Start and end dates updated to reflect this.
DP22	Introduce programme of data quality reviews.		Low	17/11/2020	31/12/2020	Deputy Data Protection Officer	Not Started		Delays due to issues recruiting to data analytics team and then issues recruiting maternity cover. Discussions with Audit as featured as part of their review of performance management, that the reviews will need to be overstaffed as the data quality reviews are time consuming. Agreed reviews will be implemented across Information Governance and Data analytics when both teams are full staffed in early 2023.
DP23	Retention schedule review.		Medium	01/01/2023	31/12/2023	Data Protection Officer	Not Started	Undertake alongside information audits.	This will be combined with the programme of information audits. Start and end dates revised to reflect this. Refer to action DP13.
DP24	Introduce retention review programme.		Medium	01/01/2023	31/12/2023	Data Protection Officer	Not Started		This will be combined with the programme of information audits. Start and end dates revised to reflect this. Refer to action DP13.
DP25	Review log of access to systems holding data.		Medium	01/01/2023	31/12/2023	Data Protection Officer	Not Started		This will be combined with the programme of information audits. Start and end dates revised to reflect this. Refer to action DP13.
DP26	Develop a social media policy.		Low	TBC	TBC	Data Protection Officer	Complete		
DP27	Clear desk policy.		Low	01/01/2022	31/12/2022	Deputy Data Protection Officer	Complete	To be implemented when return to office.	Clear Desk Policy already in place from May 2019. This action has been marked as complete to reflect this.
DP28	Develop page on website to provide to residents in cases of breach or if have privacy concerns.		Low	01/11/2022	31/12/2022	Information Governance Officer	Not Started		To be completed when updating the data protection information on the website to address common queries. Start and end dates revised to reflect this.
DP29	Develop advice sheet to provide to residents in cases of breach or if have privacy concerns.		Low	04/01/2021	31/03/2021	Deputy Data Protection Officer	Complete		Information provided during Data Protection Week in January 2022 via social media. This action has now been marked as complete.
DP30	Ensure data protection and Information management is routinely on audit plan.		Low	02/02/2021	31/03/2021	Senior Information Risk Owner	Complete		
DP31	Ensure that performance indicators are added to Information management agenda.		Medium	01/11/2020	30/11/2020	Information Governance Officer	Complete		
DP32	Complete CCTV Review.		High	15/11/2022	31/03/2023	Data Protection Officer	In Progress		Tender completed. Work due to commence in November 2022. End date revised according to project plan.