

Mid Ulster District Council GDPR Compliance Plan (draft)

General Data Protection Regulations Legislation becomes effective on 25th May 2018. (

Data Protection Principles	What Work is required	Detail	Lead Responsibility	Time frame
GDPR Plan	Creation and adoption of Plan of action for Council	Plan developed and circulated	BOH	Feb 18
Appointment of DPO , Resources Allocation & Awareness	Statutory appointment	Appointment of DPO, review JD and Responsibilities	CEX & OD	Mar- April 2018
	GDPR, Resources and Knowledge Training and Communication	Nominate GDPR representatives per Service	SMT	Feb-Mar 18
		Guidance and awareness training programme for all SMT, Heads of Service, Facilities Mangers and Staff handling personal Data to attend	OD &HR	Feb 18
		Develop & Implement internal Communications on issue, intranet ,Team meetings , Staff News etc..	Um & ALL	Feb 18
Governance	Review of Policies, data collection, data handling, security and data retention practices and policies to ensure compliance with the revised data protection principles	Data Protection Policy	Nominated	June 18
		CCTV Policy	BOH	June 18
		Social Media Policy	UM	May18
		ICT Security Policy	BOH	July 18
		Retention & Disposal Policy	PM	May 18
		Procurement Policy	PK	May 18
	Review practice, polices to ensure Council embeds a culture of 'Design by default' within data protection considerations	Customer Service Policy	UM	May 18
		HR Policies	HR & OD	May 18
		Photographic Policy	Um	June 18
		Policy development framework & Templates	PM	Mar 18
GDPR Compliance Monitoring and Audit	General Data Protection Audit and monitoring and reviewing of compliance and records	Independent appraisal of each Service GDPR compliance	Int. Audit/DPO	Sept 2018
		Monitor Action Plan and Risks Register	SMT, Int. Audit/DPO	

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Information Inventory	Information Inventory Scoped and Designed	Design Information collection template	BOH	Feb 18
	Inventory recorded and Maintained	Data mapping exercise for each service formally recorded	Nominated individuals /HOS	Feb-Mar 18
		Fully review the scope and requirements for PIA across the council services	Nominated individuals /HOS	Apr 18
	Privacy Impact Assessments(PIAs)	Complete PIAs Identified	Nominated individuals /HOS	May 18
		Each facility CCTV PIA to be completed in line with policy	Facility managers	Mar 18
Lawful Processing	Review legal basis for processing to ensure these remain lawful and appropriate before processing:-	Update privacy notices to state the legal basis and 'purpose' on which personal data is being processed.	Nominated individuals /HOS	Apr 18
	<p>Necessary for the performance of a contract –eg gym membership</p> <p>–Necessary for compliance with a legal obligation to which the controller is subject –eg monitoring information</p> <p>–Necessary to protect vital interests –eg emergency first aid</p>	Update consents to comply with the stricter requirements for valid and 'explicit' consent processes and personal data handling by each service.	Nominated individuals /HOS	Apr 18
Privacy Notices	Audit existing privacy notices	Services to review privacy notices and adequacy in documentation and web	Nominated individuals /HOS	Mar 18
	Review, Update and Agree	Amend, Agree and Publish privacy notices	Nominated individuals /HOS	Mar 18

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Data Subject Requests(SARs) And Breach Notification	Mechanism to process SARs,	Review and Amend Dynamic workflows for Data protection requests and Compliance.	BOH	Mar -Apr 18
	Data Subject requests e.g. Change erase, restrict, object, portability, automated decision making	Establish individual rights requests processes for the Council	BOH	Mar
	Report breaches to ICO and Council within timescales	Establish Breach Process and communicate to Services	BOH	Apr
Children & Data	Review processes where children's data is processed	Age consent: Update Service consents, age verification and authorisation processes to comply with the stricter requirements for valid consent for processing children's personal data	Nominated individuals /HOS e.g sport	25 th May 2018
Contracts	Review Existing Contracts	Audit existing Suppliers and 3rd party data processors arrangements / contracts to identify GDPR data processor obligations.	Nominated individuals /HOS	MARCH 2018
	Existing contracts (on a risk basis)	Identify data processor and data controller and their respective roles, responsibilities and liabilities	Nominated individuals /HOS	April 2018
		Draft letter/amended contract terms re GDPR compliance with existing providers	CMcN	March 2018
	Contracts to be awarded post May 2018	Update procurement T&Cs, RFQ, tenders' templates in respect of GDPR	PK, CMcN	April 2018
	Third Party Data Processors Review	Ensure 3 rd party processors meet GDPR requirements	Nominated individuals /HOS	ongoing
	Contracts to be awarded post May 2018	Identify data processor and data controller and their respective roles, responsibilities and liabilities	Nominated individuals /HOS	When drafting specification
	Vetting	Establish a robust vetting process to ensure data processor is GDPR compliant itself	DPO	April 2018