

Appendix B – Action Plan Overview

This overview is colour coded to match the priorities indicated within the Data Protection & UK GDPR Compliance Internal Audit Report; red as high risk, amber as medium risk and green as low risk. All actions which have not been colour coded either are mechanisms for continued review following the completion of the action or are other actions not identified within the audit but will ensure best practice.

November 2022	December 2022	March 2023	May 2023	September 2023
<p>Updated Data Protection Policy approved by Leadership Team and Audit & Member Standards</p> <p>GDPR training for all staff</p> <p>GDPR guidance available online</p> <p>Privacy Notice review and update</p> <p>Data breach log updated with recommended changes</p> <p>Meetings booked with all Core Managers</p> <p>Review of employment contract</p> <p>Updated disciplinary policy to incorporate failure to respond to requirements of GDPR</p> <p>Updated Individual Rights Procedure Log</p> <p>Leadership Team & Core Managers to meet monthly for continued oversight on service issues including compliance with GDPR</p> <p>Update to Audit & Member Standards</p>	<p>Updated Data Protection Policy on the website and intranet</p> <p>C&DPO & Information Manager as central hub of information</p> <p>GDPR expectations set into all OKRs</p> <p>Inception of Information Hub</p> <p>Inception of Decision Hub</p>	<p>GDPR module on Totora</p> <p>Updated ROPA</p> <p>Updated retention schedule</p> <p>Approved project plan to automate retention schedules within all systems</p> <p>GDPR training for all managers</p> <p>DPIA log completed and new process incepted to include the Compliance and Data Protection Officer at the first stage for all processing activities</p> <p>Follow up of changes with audit and an update briefing paper to Audit & Member Standards</p> <p>Follow up with audit</p>	<p>Review of ROPA</p> <p>Review data sharing agreements</p> <p>Review of Privacy Notice/s</p> <p>Review of any automated decision making plans</p> <p>Review of any DPIAs</p> <p>Automation of retention schedule in place for 50% of systems which have capability</p>	<p>Review of ROPA</p> <p>Review of any DPIAs</p> <p>Automation of retention schedule for 100% of systems which have capability</p> <p>Clear project for all services to ensure paperwork complies with the Retention Schedule</p> <p>Clear project for all services to ensure data has migrated from drives to Team</p> <p>Follow up review of changes by audit and an updated to be provided to Audit & Member Standards with a new action plan based on the review</p>