

Information Governance – GDPR Implementation and associated KPIs
SRO: Richard Williams

Period: 1st June – 30th June

GDPR Implementation Programme

Status		Previous RAG	Current RAG	Summary
In Implementation		A	A	
Schedule	Cost	Benefits	Resource	Implementation of Information Asset Register due to begin in late July. Project is at Amber as full implementation of DSAR centralisation will not occur until late Summer / Autumn 2018. DSARs present the greatest risk. GDPR training completion is at 37%, up from 29% in May.
A	G	G	G	

12 Point Plan Milestones (Completed and Planned Activity)

Milestone	Status / RAG
1 - Corporate Awareness	Ongoing
2- Information Asset Register	Ongoing
3 – Privacy Notices	Ongoing
4 – Data Subject Rights	Complete
5 - DSARs	Ongoing
6 – Lawful Basis for processing	Ongoing
7 – Consent management	Ongoing
8 – Contracts	Complete
9 – Data Breaches	Complete
10 – Design & Default	Complete
11 – Appoint DPO	Complete
12 – International Transfers	Complete

R/I?	Risk/Issue	Action to address
I	DSAR processing is non-compliant with GDPR. This is a direct contravention of GDPR and SCC could be liable for penalties	Due to financial imperative, recruitment of the new DSAR team is currently on hold; restructuring is being considered by management.



Data Protection Breaches				DSARs			
2016-17 Minor	2017-18 Minor	2016-17 ICO Reports	2017-18 ICO Reports	Received 2016	Received 2017	Overdue 2016	Overdue 2017
28	62	2	2	200	271	59	76

SWAP Audits (Level 4s)

GDPR – Appoint DP Champions	Complete
DSAR – Single System	On-going

