Item 13: General Data Protection Regulations

1. Purpose of Report

To provide Members of the Authority with details relating to the new General Data Protection Regulations (GDPR)

2. Recommendations

Members are recommended to:

a. Note the changes to the former Data Protection Regulations.
b. Note the action plan developed in response to the new regulations.

3. Implications

a. Financial: There will be some costs in relation to training and additional hours for the designated Data Protection Officer.
b. Equalities: None

4. Background

a. The EU General Data Protection Regulations come into force on 25th May 2018. The main principles of GDPR are similar to those in the current Data Protection Act. Organisations are required to review and amend their policies and procedures to meet the enhanced requirements for GDPR compliance.
b. There are new laws relating to the privacy of individuals and specific rights relating to the information they provide and that an organisation may hold or ‘process’ about individuals.
c. There are also enhanced requirements for the security of information that organisations process including development of procedures relating to security breaches and access to personal information.

5. Activity and Action Plan for Northumberland National Park

a. Local authorities have specific requirements under GDPR regarding the processing of information. Their statutory obligation means they will collect and process information about individuals relating to planning applications, stakeholder and tenancy details. However it also collects information for use in marketing and promotions which require specific consent. The policies and procedures will need to recognise these different aspects to the organisation.
b. Northumberland National Park Authority has developed a programme for compliance with the new regulations and the action plan in Table 1 below sets out the key activities to achieve this. Earlier this year an external audit and data mapping exercise were completed. A privacy notice has been created for the organisation and senior management and staff are actively involved in development of the remaining compliance documentation.
c. Claire Mason (the Interim Sill Manager) has experience in training organisations in preparation for GDPR and has been assisting the Authority in addressing its GDPR Action Plan.
d. Susannah Buylla, Head of Development Management, has been appointed as Data Protection Officer for the Authority, and has agreed to work additional hours as required (currently works part-time) to fulfil the role. Any aspects of Susannah’s existing role...
which could give rise to potential conflict have been managed to facilitate the Data Protection Officer role.

Table 1 – GDPR Action Plan

<table>
<thead>
<tr>
<th>Action details</th>
<th>Responsible</th>
<th>Timeline</th>
<th>Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>Introduction to staff and GDPR</td>
<td>Claire Mason</td>
<td>Complete at 16/05</td>
<td>Email to all staff</td>
</tr>
<tr>
<td>Review data mapping exercise once completed – risk assessment and actions to achieve compliance</td>
<td>Claire Mason, Ben Rogers</td>
<td>Complete at 25/05</td>
<td>Will also need to review the data held with staff</td>
</tr>
<tr>
<td>Prepare report for leadership team</td>
<td>Claire Mason</td>
<td>Ongoing</td>
<td>Regular updates on progress</td>
</tr>
<tr>
<td>Draft data protection policy</td>
<td>Claire Mason</td>
<td>08/06</td>
<td>Based on data mapping</td>
</tr>
<tr>
<td>Prepare staff updates and guidance/training</td>
<td>Claire Mason</td>
<td>22/06</td>
<td>Will develop from the data mapping</td>
</tr>
<tr>
<td>Offer support to managers as indicated in audit report via 1-1’s</td>
<td>Claire Mason</td>
<td>Ongoing</td>
<td>Meetings and emails</td>
</tr>
<tr>
<td>Prepare revised privacy notices for websites</td>
<td>Claire Mason</td>
<td>Complete</td>
<td>Once mapping and RA completed</td>
</tr>
<tr>
<td>Discuss and agree DPO role</td>
<td>Susannah Buylla</td>
<td>Complete</td>
<td>DPO confirmed</td>
</tr>
<tr>
<td>DPO training</td>
<td>Susannah Buylla</td>
<td>Ongoing</td>
<td>Courses identified for Autumn 2018</td>
</tr>
</tbody>
</table>

6. Conclusion

- Our overall state of readiness

The organisation has an action plan in place to ensure it will achieve full compliance with GDPR requirements in due course.

- Appointment of DPO as required by 28.05.2018 – this is in point 5 d above.
- Key next steps

Over the coming weeks the DPO will be required to undertake a training course to acquire the necessary knowledge for the role. Key documents will be rolled out across the Authority, including an updated privacy notice added to the website.

Contact Officers: For further information contact Claire Mason, Interim Sill Manager, e-mail: claire.mason@nnpa.org.uk or Susannah Buylla, Data Protection Officer, e-mail: Susannah.buylla@nnpa.org.uk