Item 10: Update on General Data Protection Regulations

1. Purpose of Report

To provide Members of the Authority with an update relating to progress on the action plan developed in response to the General Data Protection Regulations (GDPR).

2. Recommendations

Members are recommended to:

a. **Note the updated action plan for GDPR compliance**

b. **Note the need to engage with the GDPR E-learning module**

c. **Note and endorse the Authority’s Data Protection Policy attached as Appendix 1 that was approved by Leadership Team in October 2018**

3. Implications

a. **Financial**: Costs in relation to essential training of all staff and members will be covered within the existing training budget provision. These can be accommodated within the existing budget plan

b. **Equalities**: None

4. Background

a. The EU General Data Protection Regulations came into force on 25 May 2018. Members were advised of these changes at the Annual authority meeting in July 2018.

b. **To summarise**, organisations are required to review and amend their policies and procedures to meet the enhanced requirements for GDPR compliance.

c. **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.**

d. **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. Northumberland National Park Authority has developed a programme for compliance with the new regulations and an action plan was provided to Members in July 2018. Table 1 below sets out a revised action plan highlighting the further key activities that are necessary to achieve compliance.

b. The following documentation have been agreed at Senior Management level:

   - NNPA privacy notice (available online)
   - NNPA data protection policy (Appendix 1 to Item 10)
   - Data breach policy and procedures
   - Subject access policy and procedures (including a subject access form)

c. The remaining compliance documentation is being progressed. These include:

   - Complete and accurate data asset register, including lawful basis for data collection
   - Data retention and deletion policy and procedure
   - Photo consent forms
d. Staff and member training is essential to ensure the Authority’s compliance with GDPR. All staff and members will be emailed details of the online E-learning course. Members are advised of the importance of ensuring this training is completed.

Table 1 – GDPR Action Plan Updated Autumn 2018

<table>
<thead>
<tr>
<th>Action details</th>
<th>Responsible</th>
<th>Timeline</th>
<th>Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>Updates to Leadership Team</td>
<td>S Buylla</td>
<td>Ongoing</td>
<td>Regular updates on progress</td>
</tr>
<tr>
<td>Data protection policy and privacy notice completed</td>
<td>C Mason</td>
<td>Complete at 2 October 2018</td>
<td>Email to all staff</td>
</tr>
<tr>
<td>Data breach and procedures policy completed</td>
<td>C Mason / S Buylla</td>
<td>Complete at 2 October 2018</td>
<td>Email to all staff</td>
</tr>
<tr>
<td>DPO training</td>
<td>S Buylla</td>
<td>Ongoing</td>
<td>Online course completed July 18 and DPO course identified</td>
</tr>
<tr>
<td>Staff and Member E-learning (including new starters induction)</td>
<td>S Buylla / M Wallace</td>
<td>Mid November 2018 and ongoing</td>
<td>Email to staff and members</td>
</tr>
<tr>
<td>Review and complete data asset register</td>
<td>S Buylla / B Rogers</td>
<td>Ongoing</td>
<td>Finalise after staff training</td>
</tr>
<tr>
<td>Updates to Members at Full Authority</td>
<td>S Buylla</td>
<td>Ongoing</td>
<td>Regular updates on progress</td>
</tr>
<tr>
<td>Preparation of remaining compliance documentation</td>
<td>S Buylla</td>
<td>Ongoing</td>
<td>Data retention policies, photo consent forms</td>
</tr>
<tr>
<td>Information governance section on website</td>
<td>S Buylla / A Mitchell</td>
<td>Winter 2018</td>
<td>Ensure transparency of information and compliance</td>
</tr>
<tr>
<td>Ongoing review of policies</td>
<td>S Buylla</td>
<td>Ongoing</td>
<td>Case law is emerging, need to review policies to ensure compliance</td>
</tr>
</tbody>
</table>

6. Conclusion

a. Progress has been made on the Authority’s action plan to ensure compliance with GDPR, including finalising important compliance documents such as the Authority’s privacy notice, data protection policy and data breach policy.

b. The drafting and updating of further required policies will continue to ensure ongoing compliance.

c. Staff and member training has been initiated. Awareness of the Authority’s policies and procedures are essential for the organisation to ensure compliance with GDPR.

Contact Officer: For further information contact Susannah Buylla, Data Protection Officer, email: dpo@nnpa.org.uk or Susannah.buylla@nnpa.org.uk

Background Papers: Appendix 1 to Item 10: NNPA Data Protection Policy