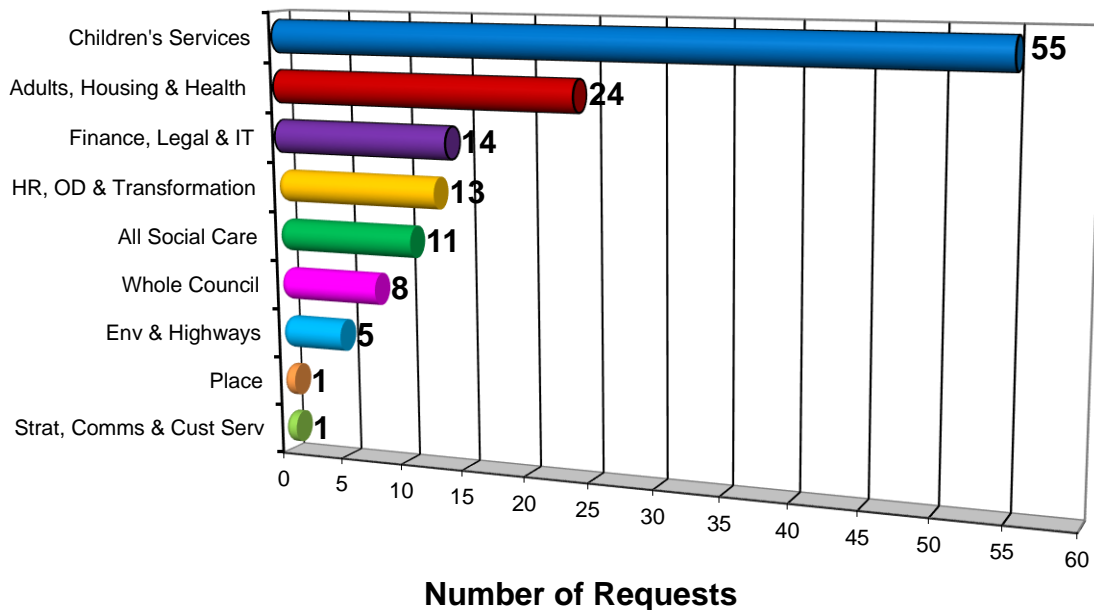


Data Protection

Subject Access Requests:

The chart below highlights the data owner areas for the 132 requests processed within 2019/20.

Subject Access Request - Data Owners



Data Protection compliance across the council:

A summary of the new Data Protection Act key changes, along with the progress made by the council to comply with these changes is detailed below:

Key Changes	Progress Made
Organisations must now demonstrate that they comply with the new Act (evidenced based).	<p>Completed work:</p> <ul style="list-style-type: none"> • A new Data Protection policy is in place • A Data Protection Compliance Programme has been produced and refreshed • Mandatory Data Protection training has been updated and implemented • Engagement with suppliers has taken place - to ensure the council meets the 'right to be forgotten' and "data portability" rights requirements

	<ul style="list-style-type: none"> • Contract clauses have been amended • Monitoring of Data Protection training has taken place
Key Changes	Progress Made
Significantly increased penalties for any breach of the Act (not just for data breaches) has been introduced.	Completed work: <ul style="list-style-type: none"> • Mandated training is in place and has been rolled out across the council. Staff have system access removed until training is completed • A Data Protection Compliance Programme has been produced and has been refreshed
A legal requirement is now in place for security breach notification to the Information Commissioners Office.	Completed work: <ul style="list-style-type: none"> • The council's security incident reporting procedure has been refreshed, which will result in certain breaches being reported to regulatory bodies
Data Protection Impact Assessments (DPIA) are now required for high risk processing and/or when using new technologies.	Completed work: <ul style="list-style-type: none"> • A DPIA process has been produced and implemented • The DPIA forms part of the council's Architecture Design Group • The DPIA procedure is part of the procurement process
Specific requirements for transparency and fair processing must be adhered to.	Completed work: <ul style="list-style-type: none"> • A detailed guide on information rights has been produced and is available on our website • A layered approach to privacy notices has been implemented
Tighter rules are in place where consent is the legal basis for processing personal data.	Work to be completed: <ul style="list-style-type: none"> • As part of the Information Governance (IG) Group work, checks are being undertaken to review how the council are obtaining and recording consent and whether the council need to make any changes.
Requirement to keep records of data processing activities.	Work to be completed: Work is on-going (and this will always be fluid due to new systems implemented) by our Information Governance Group to compile a robust Record of Processing Activity.