

# General Data Protection Regulations (GDPR)

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Replaces the Data Protection Act 1998

**Enforced from: 25<sup>th</sup> May 2018**

*“If your organisation can’t demonstrate that good data protection is a cornerstone of your business policy and practices, you’re leaving your organisation open to enforcement action that can damage both public reputation and bank balance.”*

Elizabeth Denham, UK Information Commissioner

# GDPR Project

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## Why?

New legislation is being introduced.

Compliance is evidence driven.

Fines up to **€20,000,000.**

## Who?

Project Team

Information Governance Group (IGG)

Subject Matter Experts in Services.

## When?

Enforced from 25<sup>th</sup> May 2018.

Understood that 21<sup>st</sup> CC will be on-going.

Project plan and communications plan in place.

## How?

- Analysis
- Review
- Catalogue
- Publish
- Monitor
- Share knowledge

# What?

Legislatively set responsibilities (Art 37-39):  
Point of contact (internal and external).  
Independent / Impartial.  
Audits compliance.  
Involved with PIAs.

10. Data Protection Officer

Gaps identified.  
Risks quantified.  
CLT briefed.  
Programme underway.

1. Awareness

Processing activities listed.  
Information Asset Register.  
Retention Schedule.  
Off-site storage  
& basement items.

2. Information Held

Information Sharing Agreements.  
Regular Audits required.  
Review contract wording.

9. Third Parties

**GDPR compliance focus**



3. Legal Basis

Privacy Notices:-  
transparent about collection of data.  
Exceptions / Exemptions.

8. Breach Capability

4. Consent

Lists of consents used.  
Flow of data travel.  
Distribution lists reviewed.

Detection capability.  
Breach notice – 72 hours.  
Breach threshold raised.  
Failure to notify ~ €10mil.

7. Privacy Dialogue

6. Privacy By Design

5. Rights Access

Clear and prominent notices.  
Details processing purposes.  
References 3<sup>rd</sup> Party.  
Review: Forms, webforms, etc

Accountability Principle.  
Staff training.  
Policy documentation.  
Privacy Impact Assessments.  
Lessons learned.

Subject Access Requests.  
Right to be forgotten.  
Data portability.

# Preparation and progress

## Completed

- ✓ Project team set up to facilitate and co-ordinate requirements of new legislation.
- ✓ CLT and Leadership teams briefed.
  - ✓ Manager and team meetings attended.
- ✓ Produced templates and guidance for services. (Networking with other authorities for best practice).
- ✓ Breach reporting process
- ✓ Privacy Impact Assessment checklist

## To do

- E-learning being produced, and plan initiated with Learning & Development and Project team. - April
- Monitoring and progress updates scheduled. Continuous support and guidance from project team to services.
  - Policies – March /April
  - Privacy Notices - May
  - Information Asset Register - Ongoing
  - Contract Clauses - March
  - ✓ Web Page Updates – May
  - Retention Schedule
- Quality checking and publishing to website beginning from 1st May.