

## Project Highlight Report:

<b>Project Name:</b>	GDPR Implementation
<b>Project Manager:</b>	Scott Sammons
<b>Project Sponsor:</b>	Margaret Lee
<b>Reporting Period:</b>	12/10/2016 – 27/03/2017

### 1. Project Status

Cost	Timeline	Resources	Scope	Risk	Overall
Green	Amber	Green	Green	Amber	Green

**Timeline:** Due to organisational redesign implications the delivery date for the DPO will be delayed by some months. Options to implement a temporary DPO are being explored to ensure that GDPR controls implemented are 'accepted' and done in consultation with a GDPR level DPO.

**Risk:** Risk around ability to deliver by May 2018 has become an issue due to change in enforcement stance from the ICO.

### 2. Summary of Progress

Below is an overview of all confirmed actions and deliverables to date. Going forward these will only detail progress made during the reporting period.

- ✓ Initial staff awareness campaign launched on One News and via Data Protection Day events
- ✓ Engagement with relevant teams and heads of service to scope out approach and resources needed
- ✓ Project documentation complete and project structures, resources and reporting lines established
- ✓ Data inventory complete and accessible to IG (accessible to others planned for mid-2017)
- ✓ DPO Role scoped and options for implementation being explored (within the context of the organisational redesign)
- ✓ Risk based approach and capture
- ✓ Scoped changes needed to SAR & FOI requests and templates drafted ready for final review and go live
- ✓ Workshop booked to determine approach to third parties and contract management based on current risks identified and resourcing concerns

## 3. Planned activities delayed

Below is an overview of all actions and deliverables that could not be delivered as planned for the period.

- ✖ **List of high priority 3<sup>rd</sup> parties** is not complete. This will take longer than expected due to the way contracts are managed within the system. Timeframes being confirmed currently.
- ✖ **Standard DP contract terms** for GDPR and supporting processes are not complete yet. This is due to the change in stance from the ICO and looking to agree a simple approach.
- ✖ **Confirm data sharing frameworks in scope**, owners, and timeframes for implementing any needed changes.
- ✖ **Implementation of the Data Protection Officer** is delayed due to the organisational redesign work. Any changes to roles will need to form part of this redesign which is planned from June 2017. Options for an interim GDPR suitable DPO are being explored and can be re-baselined if the Board Agree. .

## 4. Planned upcoming activities

Below is an overview of all actions and deliverables that are planned to be delivered between now and the next project board for each Workstream.

<b>1. Governance</b>	<ul style="list-style-type: none"> <li>➤ Revised PIA process incorporating GDPR requirements</li> </ul>
<b>2. Assurance</b>	<ul style="list-style-type: none"> <li>➤ Agree project assurance/quality programme outlined in PID</li> </ul>
<b>3. Third Party Management</b>	<ul style="list-style-type: none"> <li>➤ Workshop to be held on 3<sup>rd</sup> Party Management with all stakeholders to agree options for implementation and resources required.</li> <li>➤ Completion of Full GDPR contract wording (implement once DPA repealed)</li> <li>➤ Engagement with suppliers on GDPR changes through supplier comms.</li> </ul>
<b>4. Collection &amp; Use</b>	<ul style="list-style-type: none"> <li>➤ Completed documenting website privacy notice management process.</li> <li>➤ Workshop on consent management within Social care, looking for a simple solution which is GDPR compliant.</li> </ul>
<b>5. Retention &amp; Destruction</b>	<ul style="list-style-type: none"> <li>➤ Confirm retention schedule known current gaps and scope any need for changes to retention periods / need for defined legal requirements to keep.</li> <li>➤ Confirm destruction programme between now and 2018 and any other RM related initiatives to tidy up electronic</li> </ul>

	and paper records.
<b>6. Rights</b>	<ul style="list-style-type: none"> <li>➤ Confirm required actions for Right of Data Portability with the Essex Energy Switch Team.</li> <li>➤ Confirm requirements for online portal for SARs &amp; Complaints.</li> </ul>
<b>7. Security</b>	<ul style="list-style-type: none"> <li>➤ Confirm current process for incident response and highlight areas of improvement (if needed).</li> <li>➤ Confirm current security controls.</li> <li>➤ Confirm current data integrity controls.</li> <li>➤ Confirm current Business Continuity controls</li> </ul>
<b>8. Systems &amp; Technology</b>	<ul style="list-style-type: none"> <li>➤ Confirm current anonymization practices and capabilities.</li> <li>➤ Confirm systems in scope for retention and destruction requirements &amp; start to scope out resources needed to implement requirements.</li> </ul>
<b>9. Training &amp; Awareness</b>	<ul style="list-style-type: none"> <li>➤ Key Heads of Service comms seeking confirmation of engagement and resource support.</li> <li>➤ Third party comms on GDPR changes and how ECC will be engaging with them.</li> </ul>
<b>10. Staff Data</b>	<ul style="list-style-type: none"> <li>➤ None due</li> </ul>

## 5. Project Delivery Risks & Issues

Below is an overview of the current high and medium project delivery risks and issues. The full risk register is found in Appendix A.

### Risks:

Ref No.	Description	Crude Score	Proposed Controls	Owner	Residual Score	Status
R-001	Project cannot meet the required deadline of the 25th May 2018	12	Agree risk management approach. Prioritise resources. Monitor enforcement approach by ICO	Scott Sammons	9	Open
R-002	There is not suitable	6	Confirm changes as	Scott	4	Open

	time to implement required system and technology changed as they are too complex		soon as possible. Prioritise high risk areas first.	Sammons		
R-003	Internal knowledge and resources become unavailable resulting in a delay to the project or the need to rely on external resources therefore increasing project costs	6	Agree prioritisation of resourcing with other projects.	Scott Sammons	4	Open
R-002	There is not suitable time to implement required system and technology changed as there is no suitable IT resource available	6	Confirm changes as soon as possible. Prioritise high risk areas first so resourcing can be scoped.	Scott Sammons	4	Open

## Issues:

Ref No.	Description	Impact	Priority	Owner	Comments	Status
I-001	ICO has changed stance on enforcement from supporting risk based approach to full enforcement from day 1. This affects our third party risk areas the most as this is the biggest bit of work.	High	High	Scott Sammons	Workshop booked with commercial and procurement to determine issues, options and resources needed to create a plan and make a dent in the number of 3rd parties in scope.	Open
I-002	DPO role cannot be implemented by April 2017 due to organisational redesign. Options for temp DPO role being explored so that impact to project progress is minimal.	High	High	Scott Sammons	Options paper redrafted with full options for org redesign programme. If board agree, DPO decisions will be made by the Project Team & escalated where necessary until December 2017.	Open

### 6. Budget / Cost Issues

There is no agreed central budget. Time recording is estimated per area and any cost requests will be reviewed with case by case. This area will outline any cost requirements / requests for the project team & board to review.

None currently recorded.