

Project Highlight Report:

Project Name:	GDPR Implementation
Project Manager:	Scott Sammons
Project Sponsor:	Margaret Lee
Reporting Period:	27/03/2017 - 02/06/2017

1. Summary Project Status:

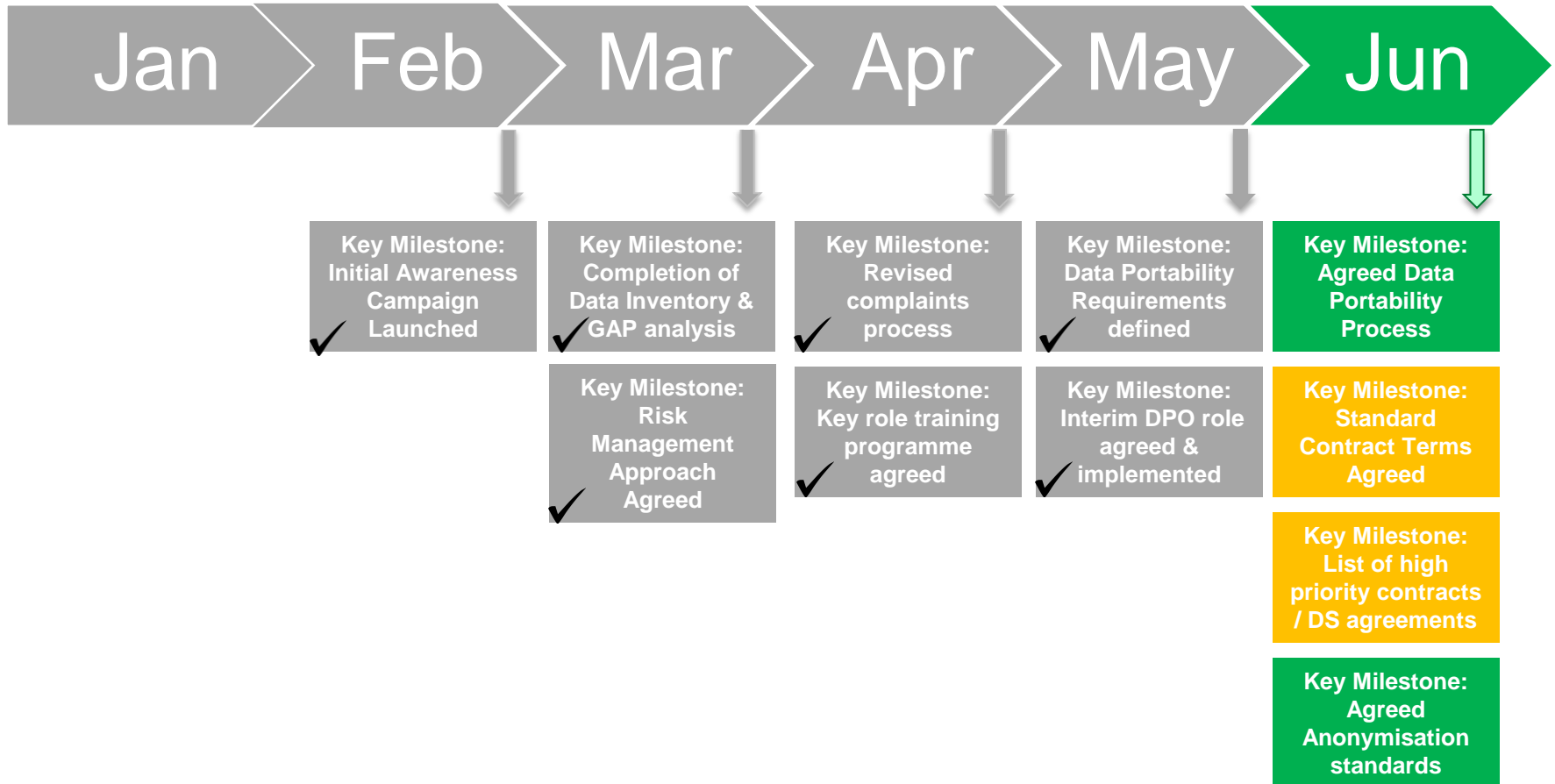
Below is an overview of all confirmed actions and deliverables to date. Going forward these will only detail progress made during the reporting period.

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

2. Timeline

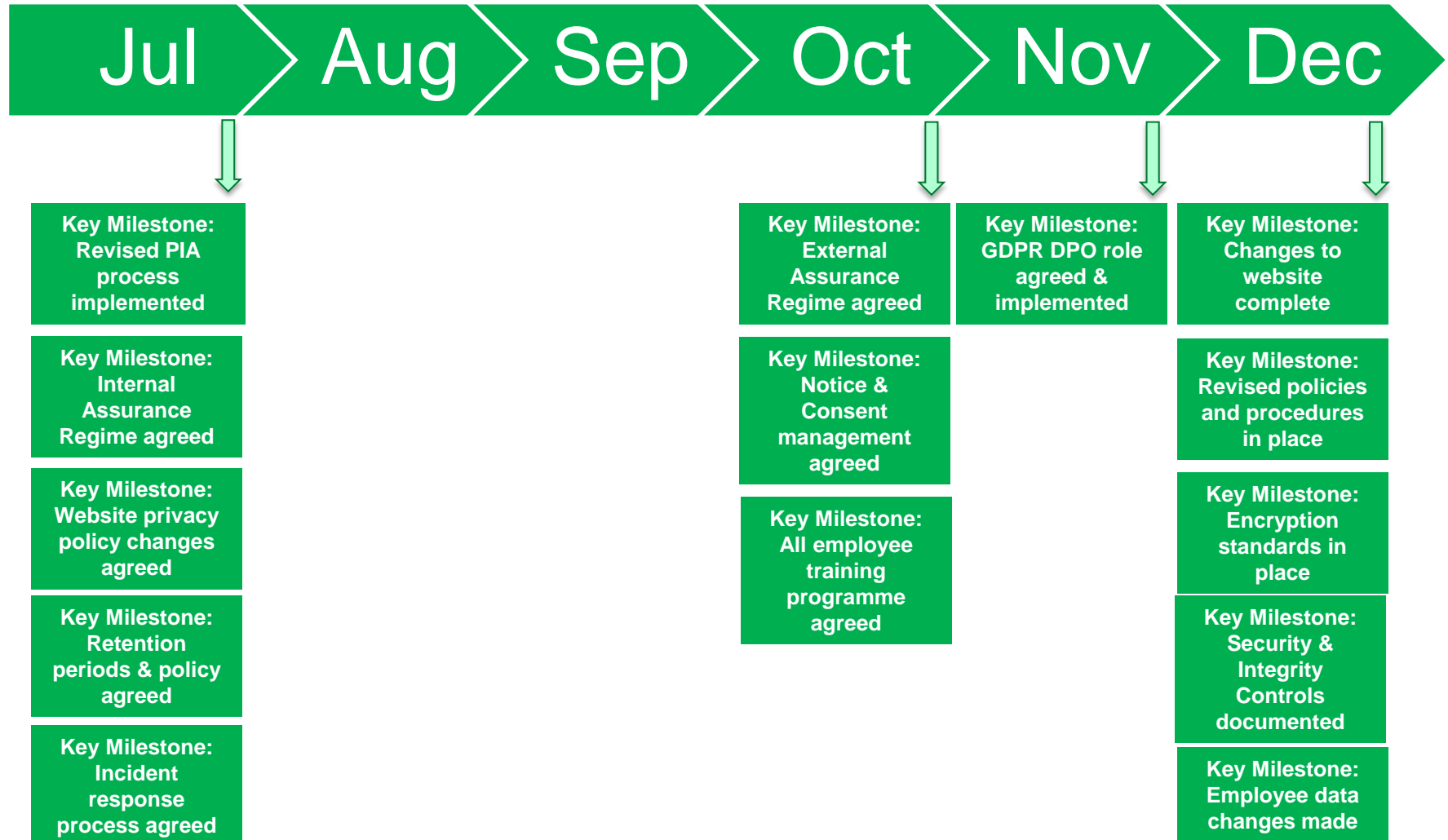
Below is an overview of all confirmed actions and deliverables to date. Going forward these will only detail progress made during the reporting period.

2017



2. Timeline

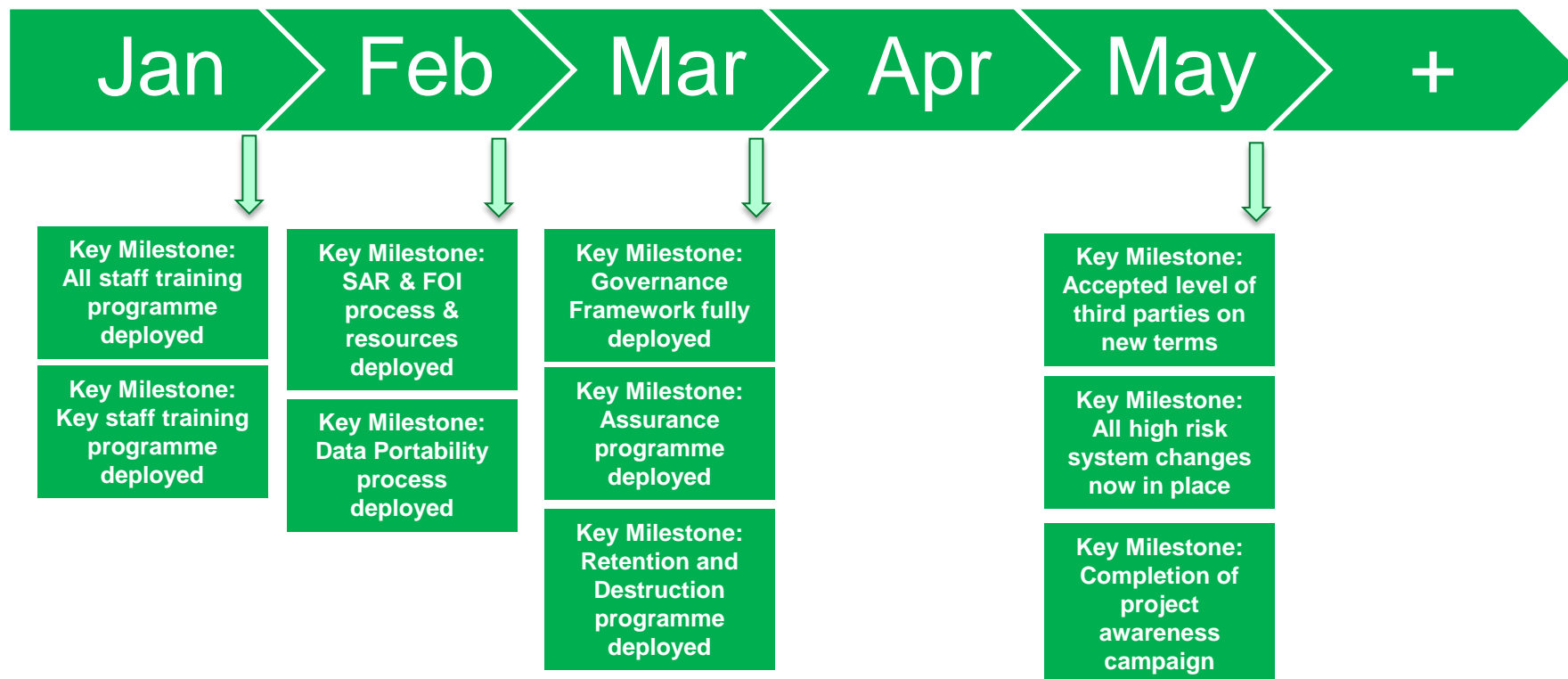
Below is an overview of all confirmed actions and deliverables to date. Going forward these will only detail progress made during the reporting period.



2. Timeline

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

2018



3. Deliverables

Below is an overview of the status of the work streams and the deliverables within them. Green highlights that the deliverables are currently on track, grey indicates that the work stream is dormant, amber is a risk of delay and red is a confirmed delay. Please click on the area you wish to review to see a more detailed breakdown of each deliverable.

1. Governance Framework Controls

2. Assurance Regime

3. Third Party Management Controls

4. Controls on collection & use

5. Controls on Retention & Destruction

6. Controls to manage Rights

7. Security Controls

8. System Controls

9. Training & Awareness

10. Controls on Staff Data

3. Stream 1 - Governance Framework Controls

Below is an overview of the status of the work streams and the deliverables within them. Green highlights that the deliverables are currently on track, grey indicates that the work stream is dormant, amber is a risk of delay and red is a confirmed delay. The blue highlight indicates the current activity underway.

Deliverable:	Activities:	Due Date:	Status:	Priority:	Comments:
1.1 Revised policies and procedures	Scope and gather all policies and procedures in scope and determine their owners.	13/03/2017	[complete]	High	Dates may vary for each policy but aim is to have the last ones done by November 2017.
	Collate changes needed for each policy	01/11/2017	[underway]		
	Submit changes for approval	02/11/2017	[not started]		
	Publish changed documents on to staff policy areas	20/11/2017	[not started]		
1.2 Revised Privacy Impact Assessment Process	Scoping requirements	31/03/2017	[complete]	Medium	None.
	Collating changes needed	25/04/2017	[complete]		
	Design of new process and form	15/06/2017	[underway]		
	Publication & handover	31/07/2017	[not started]		
1.3 Agreed risk approach & framework	Document risk approach options based on available resources	01/03/2017	[complete]	Medium	Approach was documented in PID approved by Board.
	Presentation of risk approach to project board	29/03/2017	[complete]		
1.4 Implementation of the GDPR Data Protection Officer Role	Scope out requirements of role for ECC	24/02/2017	[complete]	High	Final date dependent on work being undertaken in the Organisational Redesign programme.
	Document current practice and complete gap analysis	07/03/2017	[complete]		
	Agree interim DPO role with ML & DW	03/05/2017	[complete]		
	Implement interim DPO role	08/05/2017	[complete]		
	Collate and present DPO requirements to Org Redesign work	28/05/2017	[underway]		
	Agree final options for GDPR DPO role	29/09/2017	[not started]		
	Implement GDPR DPO role	30/11/2017	[not started]		

3. Stream 2 - Internal and External Assurance Controls

Below is an overview of the status of the work streams and the deliverables within them. Green highlights that the deliverables are currently on track, grey indicates that the work stream is dormant, amber is a risk of delay and red is a confirmed delay. The blue highlight indicates the current activity underway.

Deliverable:	Activities:	Due Date:	Status:	Priority:	Comments:
2.1 Implementation of internal assurance controls	Scope and collate requirements for an internal assurance regime	28/04/2017	[complete]	High	Current internal audit processes suitable. DP part of ongoing and already established audit programme.
	Present requirements to Internal Audit and discuss options	05/05/2017	[complete]		
	Agree and implement assurance controls for 2018	30/06/2017	[underway]		
2.2 Implementation of external assurance controls	Scope and collate requirements for an external assurance regime	28/04/2017	[complete]	High	Areas of concern highlighted with auditing of third parties. Options being explored for how this can be achieved.
	Present requirements to working group and discuss options	27/06/2017	[underway]		
	Agree and implement assurance controls for 2018	27/07/2017	[not started]		

3. Stream 3 - Delivery of third party management controls

Below is an overview of the status of the work streams and the deliverables within them. Green highlights that the deliverables are currently on track, grey indicates that the work stream is dormant, amber is a risk of delay and red is a confirmed delay. The blue highlight indicates the current activity underway.

Deliverable:	Activities:	Due Date:	Status:	Priority:	Comments:
3.1 Creation of a central list of third parties in scope	Scope and document requirements for which third parties are in scope	24/02/2017	[complete]	High	Central register delayed due to volume and complexity of systems holding this information.
	Produce a list of all third parties in scope and scale of work needed	27/02/2017	[underway]		
3.2 Develop standard set of GDPR contract terms	Review, approve and publish current terms to version 2.0 (interim GDPR and DPA).	10/03/2017	[complete]	High	Version 2.0 published (GDPR & DPA blend) and Version 3.0 (full GDPR) completed initial review. Now awaiting further supporting UK laws in order to progress.
	Edit version 2.0 to be GDPR only wording based on requirements	14/04/2017	[complete]		
	Legal review and sign off of contract terms	05/05/2017	[underway]		
	Implementation of version 3.0 within commercial and procurement with appropriate guidance and support.	27/04/2018	[not started]		
3.3 Agreed approach and implementation plan for high risk 3rd parties	Document estimated issues, scope and resources for third parties	21/04/2017	[complete]	High	Delayed based on delay to above deliverable 3.1. New contracts on V2 terms and high priority contracts highlighted for migration for V3 when ready.
	Document current communication channels with third parties	14/04/2017	[complete]		
	Agree ongoing action plan to move parties on to new contract terms	26/05/2017	[underway]		

3. Stream 4 - Delivery of controls on the collection and use of PD

Below is an overview of the status of the work streams and the deliverables within them. Green highlights that the deliverables are currently on track, grey indicates that the work stream is dormant, amber is a risk of delay and red is a confirmed delay. The blue highlight indicates the current activity underway.

Deliverable:	Activities:	Due Date:	Status:	Priority:	Comments:
4.1 Updated privacy notices and process to maintain them	Document current practices and controls for maintaining notices	21/04/2017	[complete]	High	Privacy notices currently being revised based on DLM output. Business will need to review before publication. Need to re-baseline.
	Determine any gaps and produce actions for changes	28/04/2017	[underway]		
	Collate & apply changes to privacy notices from other work streams	12/05/2017	[not started]		
4.2 Updated website privacy notice and policy, including supporting process	Document current practices and controls for maintaining website notices	21/04/2017	[complete]	High	Website privacy policy currently being revised based on DLM output. Business will need to review before publication. Need to re-baseline.
	Determine any gaps and produce actions for changes	28/04/2017	[underway]		
	Collate & apply changes to privacy notices from other work streams	19/05/2017	[not started]		
4.3 Scope, build and implement methods for managing consent	Scope definition and requirements of consent	10/05/2017	[complete]	High	Consent requirement under review. Some elements dependant on UK legislation yet to be drafted.
	Determine methods for capturing and managing consent	10/05/2017	[complete]		
	Produce options paper for review	02/06/2017	[underway]		
	Implement options inc delivery and launch	27/10/2017	[not started]		
4.4 Complete development and implementation of ROPA database	Determine current status of ROPA and resources required	03/03/2017	[complete]	High	New database under development but delayed. Information needed is accessible so delay has little impact to deliverables,
	Implement required changes	12/05/2017	[complete]		
	Test changes	19/05/2017	[underway]		
	Deploy to target audience with training	26/05/2017	[not started]		

3. Stream 5 - Delivery of controls on retention and destruction

Below is an overview of the status of the work streams and the deliverables within them. Green highlights that the deliverables are currently on track, grey indicates that the work stream is dormant, amber is a risk of delay and red is a confirmed delay. The blue highlight indicates the current activity underway.

Deliverable:	Activities:	Due Date:	Status:	Priority:	Comments:
5.1 Agreed and published retention periods for Personal Data	Determine current retention periods and formatting	14/04/2017	[complete]	High	Work underway but delayed due to resource pressures. Delay has no material impact unless final deployment date is delayed.
	Review period and highlight any gaps	28/04/2017	[underway]		
	Where gaps exist, highlight for legal review	12/05/2017	[not started]		
	Produce options paper for best method of presenting retention periods to staff and public	18/05/2017	[not started]		
	Implement options for retention presentation & management	28/07/2017	[not started]		
5.2 Establish and implement process for managing and monitoring retention periods.	Determine and collate all areas dependant on the retention schedule	28/04/2017	[complete]	Medium	Based on the above, minor delay which can be corrected.
	Document and agree process for maintaining schedule and communicate among affected staff.	26/05/2017	[underway]		
5.3 Agree and establish a process for the destruction of Personal Data	Determine current controls and risks around electronic destruction of personal data	14/04/2017	[complete]	High	Work underway but delayed due to other pressures. Need to review DFP plans in this area and re-review risk if needed.
	Determine current controls and risks around physical destruction of personal data	14/04/2017	[complete]		
	RE-review both risks and present options paper on resources required	28/04/2017	[underway]		
	Implement agreed option and establish monitoring controls	31/05/2017	[not started]		

3. Stream 6 - Delivery of controls to manage subject's rights

Below is an overview of the status of the work streams and the deliverables within them. Green highlights that the deliverables are currently on track, grey indicates that the work stream is dormant, amber is a risk of delay and red is a confirmed delay. The blue highlight indicates the current activity underway.

Deliverable:	Activities:	Due Date:	Status:	Priority:	Comments:
6.1 Right to complaint; implement changes to IG related complaints process	Scope and document changes needed to the complaints process	31/03/2017	[complete]	High	Process ready but delayed due to delay in DPO appointment. Now agreed new process can be finalised and deployed. This should be in place by mid-June.
	Agree implementation plan	14/04/2017	[complete]		
	Delivery changes with training and awareness for appropriate staff	28/04/2017	[underway]		
6.2 Right to correction, deletion & objection – agreed process and policy	Scope and document GDPR requirements	10/02/2017	[complete]	High	Agreeing changes based on system processes and designs. Work underway with service areas.
	Benchmark requirements against current processes	17/02/2017	[complete]		
	Agree changes and plan for implementation	17/02/2017	[underway]		
	Implement changes with training support	22/12/2017	[not started]		
6.3 Right to access; implement SAR changes and updated guidance	Scope and document GDPR requirements	10/02/2017	[complete]	High	Procedures, policies etc. all drafted. Awaiting confirmation final UK legislation (inc exemptions) before proceeding.
	Benchmark requirements against current processes	17/02/2017	[complete]		
	Agree changes and plan for implementation	22/12/2017	[underway]		
	Implement changes with training support	28/02/2018	[not started]		
6.4 Data Portability; Agreed scope and implement necessary requirements	Scope and document GDPR requirements	03/03/2017	[complete]	Medium	Scope confirmed, working with Energy Switch team to progress with outside provider.
	Benchmark requirements against current processes	14/04/2017	[complete]		
	Agree changes and plan for implementation	28/04/2017	[complete]		
	Implement changes with training support	20/06/2017	[underway]		

3. Stream 7 – Delivery of appropriate security controls (i)

Below is an overview of the status of the work streams and the deliverables within them. Green highlights that the deliverables are currently on track, grey indicates that the work stream is dormant, amber is a risk of delay and red is a confirmed delay. The blue highlight indicates the current activity underway.

Deliverable:	Activities:	Due Date:	Status:	Priority:	Comments:
7.1 Agree and implement incident response process	Scope and document incident response and notification processes	14/04/2017	[complete]	High	New process and key roles agreed. Delayed due to DPO appointment. New process will be in place by end July.
	Benchmark requirements against current processes	21/04/2017	[complete]		
	Agree changes and plan for implementation	05/05/2017	[complete]		
	Implement changes with training support	28/07/2017	[underway]		
7.2 Scope and implement encryption controls	Scope and document encryption requirements under GDPR	21/04/2017	[complete]	Medium	Work underway, no major issues identified.
	Benchmark requirements against current processes	28/04/2017	[complete]		
	Agree changes and plan for implementation	26/05/2017	[complete]		
	Implement changes with training support	22/12/2017	[underway]		
7.3 Revised data security controls	Scope and document confidentiality requirements under GDPR	09/06/2017	[complete]	High	Work underway, no major issues identified.
	Benchmark requirements against current controls	16/06/2017	[not started]		
	Agree changes and plan for implementation	23/06/2017	[not started]		
	Implement changes with training support	22/12/2017	[not started]		


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3. Stream 7 – Delivery of appropriate security controls (ii)

Below is an overview of the status of the work streams and the deliverables within them. Green highlights that the deliverables are currently on track, grey indicates that the work stream is dormant, amber is a risk of delay and red is a confirmed delay. The blue highlight indicates the current activity underway.

Deliverable:	Activities:	Due Date:	Status:	Priority:	Comments:
7.4 Revised data integrity controls	Scope and document integrity requirements under GDPR	09/06/2017	[complete]	High	Work underway, no major issues identified.
	Benchmark requirements against current controls	16/06/2017	[underway]		
	Agree changes and plan for implementation	23/06/2017	[not started]		
	Implement changes with training support	22/12/2017	[not started]		
7.5 Revised data availability controls	Scope and document availability requirements under GDPR	09/06/2017	[complete]	High	Work underway, no major issues identified.
	Benchmark requirements against current controls	16/06/2017	[underway]		
	Agree changes and plan for implementation	23/06/2017	[not started]		
	Implement changes with training support	22/12/2017	[not started]		

3. Stream 8 – Delivery of required system changes

Below is an overview of the status of the work streams and the deliverables within them. Green highlights that the deliverables are currently on track, grey indicates that the work stream is dormant, amber is a risk of delay and red is a confirmed delay. The blue highlight indicates the current activity underway.

Deliverable:	Activities:	Due Date:	Status:	Priority:	Comments:
8.1 Collated list of required system changed	Collate systems in scope and changes needed from other workstreams	14/04/2017	[complete]	High	Work delayed due to delay in requirements being confirmed. Work underway with priority system owners to progress and confirm timeframes.
	Determine costs and resources needed per change	21/04/2017	[underway]		
	Document requirements and options for Board review	05/05/2017	[not started]		
	Agree action plan based on board agreement	28/07/2017	[not started]		
8.2 Collated list of requirements for data portability	Determine systems in scope for data portability requirements	21/04/2017	[complete]	High	Work underway with Energy Switch team and outside provider.
	Determine costs and resources needed per change	28/04/2017	[complete]		
	Document requirements and options for Board review	26/05/2017	[complete]		
	Implement Board agreed options	22/12/2017	[underway]		
8.3 Deployment of Anonymisation standards and processes	Determine purposes within ECC where identification is not required	09/06/2017	[underway]	Medium	Review underway, no major issues identified as yet.
	Document anonymisation and pseudonymisation processes	16/06/2017	[not started]		
	Scope and agree areas where can be applied	23/06/2017	[not started]		
	Implement changes with training and support	22/12/2017	[not started]		

3. Stream 9 – Delivery of required training and awareness controls

Below is an overview of the status of the work streams and the deliverables within them. Green highlights that the deliverables are currently on track, grey indicates that the work stream is dormant, amber is a risk of delay and red is a confirmed delay. The blue highlight indicates the current activity underway.

Deliverable:	Activities:	Due Date:	Status:	Priority:	Comments:
9.1 Scope and deliver training programmes for key roles (DPO etc)	Determine key roles and team within ECC for dedicated training	17/03/2017	[complete]	High	Training programme underway.
	Determine training requirements for key roles	31/03/2017	[complete]		
	Draft training programme	21/04/2017	[complete]		
	Deliver training programme	22/12/2017	[underway]		
9.2 Scope and deliver ongoing project team awareness programme	Determine key project stakeholders within ECC for dedicated training	17/02/2017	[complete]	Medium	Awareness programme underway.
	Determine engagement requirements for key stakeholders	24/02/2017	[complete]		
	Delivery of engagement programme	25/05/2018	[underway]		
9.3 Scope and delivery all ECC awareness and culture change to support workstreams	Collate culture changes needed from other workstreams	25/05/2018	[complete]	High	Culture change programme being delivery and scoped for further 'other' ways to deploy.
	Delivery ongoing culture change engagement, directly and indirectly	25/05/2018	[underway]		
9.4 Scope and deliver ongoing all staff awareness and training programme	Determine training needs for all staff based on changes in organisational redesign	28/04/2017	[complete]	High	Work underway, no major issues identified as yet.
	Draft training package for both face to face and e-learning	28/07/2017	[underway]		
	Delivery training package	26/01/2018	[not started]		

3. Stream 10 – Delivery of required controls on staff data

Below is an overview of the status of the work streams and the deliverables within them. Green highlights that the deliverables are currently on track, grey indicates that the work stream is dormant, amber is a risk of delay and red is a confirmed delay. The blue highlight indicates the current activity underway.

Deliverable:	Activities:	Due Date:	Status:	Priority:	Comments:
10.1 Define and deliver any changes to how staff employment information is processed.	Determine requirements to the changes on the grounds of processing employment related data.	TBD	[not started]	High	Work on hold pending UK legislation.
	Benchmark against current ECC practices	TBD	[not started]		
	Agree timeframes and resources needed to implement changes	TBD	[not started]		
	Implement changes and management engagement through communications.	TBD	[not started]		
10.2 Define and deliver any changes to how employee rights are managed.	Determine requirements to the changes on the rights afforded to employees over their employment data.	TBD	[not started]	High	Work on hold pending UK legislation.
	Benchmark against current ECC practices	TBD	[not started]		
	Agree timeframes and resources needed to implement changes	TBD	[not started]		
	Implement changes and management engagement through communications.	TBD	[not started]		

4. Risks & Issues

Below is an overview of all identified risks to date. Going forward these will only detail progress made during the reporting period.

Summary		Description	'Crude' Risk			Controls	Residual Risk			
ID	Type	Description of Risk	P	I	R	Preventative/Contingency Actions	P	I	R	Notes
R-001	Project	Project cannot meet the required deadline of the 25th May 2018	4	3	12	Agree risk management approach. Prioritise resources. Monitor enforcement approach by ICO	3	3	9	Changed crude risk due to change in enforcement approach from the ICO.
R-002	Technical	There is not suitable time to implement required system and technology changed as they are too complex	2	3	6	Confirm changes as soon as possible. Prioritise high risk areas first.	2	2	4	None
R-003	Project	Internal GDPR knowledge and resources become unavailable resulting in a delay to the project or the need to rely on external resources therefore increasing project costs	2	3	6	Implement prioritisation of resourcing with other projects.	2	2	4	None
R-004	Project	There is not suitable time to implement required system and technology changed as there is no suitable IT resource available	2	3	6	Confirm changes as soon as possible. Prioritise high risk areas first so resourcing can be scoped.	2	2	4	None
R-005	Supplier	Restrictions on existing agreements do not allow for GDPR changes before May 2018 resulting in non-compliant contracts.	3	4	12	Begin work ASAP to identify these contracts and begin discussion with third parties on options.	3	3	9	Work underway to scope however it is likely many contracts will be non-compliant by deadline.
R-006	Training	Knowledge of IG/skills within commercial / procurement not at a suitable level resulting in requirements being missed which increases the chances of non-compliant contracts.	3	4	12	Training programme to be written to include IG and commercial / procurement. Including development of a toolkit for use.	3	3	9	None

4. Risks & Issues

Below is an overview of all identified risks to date. Going forward these will only detail progress made during the reporting period.

Summary		Description	'Crude' Risk			Controls	Residual Risk			
ID	Type	Description of Risk	P	I	R	Preventative/Contingency Actions	P	I	R	Changes
R-007	Project	The project cannot change all contract templates as there are numerous contract templates throughout ECC resulting in non-compliant contract post May 2018.	3	4	12	Scope, resources and best approach currently being determined within commercial and IG.			0	Work underway to scope however it is likely many contracts will be non-compliant by deadline.
R-008	Project	One size fits all to third party management cannot work due to the size and complexity of ECC third parties resulting in non-GDPR compliant third party processing.	3	4	12	Standard templates developed where possible. Exceptions process being investigated for case by case.	3	3	9	None, new risk added since last report.
R-009	Project	Policies and procedures are not implemented that are needed by May 2018	3	3	9	Working drafts already produced. Monitoring of UK requirements established and ready to deploy once confirmed.	2	2	4	None, new risk added since last report.
R-010	Training	Project is unable to change privacy culture within ECC meaning engagement with requirements does not occur	3	4	12	Employee engagement, IS engagement are both engaged. New methods of engagement being explored including more mobile working and refresh of champions structure.	3	3	9	None, new risk added since last report.
R-011	Service Delivery	Unable to delivery a sustainable method of managing and delivering privacy notices to data subjects.	3	4	12	Process currently being explored. ECC current practice is seen as good.	2	4	8	None, new risk added since last report.
R-012	Technical	Unable to deliver a sustainable process and technological method for managing consent	4	3	12	Process currently being explored including no longer needing consent.	3	3	9	None, new risk added since last report.

4. Risks & Issues

Below is an overview of all identified risks to date. Going forward these will only detail progress made during the reporting period.

Summary		Description	'Crude' Risk			Controls	Residual Risk			
ID	Type	Description of Risk	P	I	R	Preventative/Contingency Actions	P	I	R	Changes
R-013	Technical	Unable to migrate & delete electronic Mosaic files resulting in Sensitive Personal Data being kept for longer than is legally required.	4	3	12	Currently being investigated with DFP actions looking at addressing this.	4	3	12	None, new risk added since last report.
R-014	Service Delivery	Unable to find and review all systems that require Privacy Impact Assessments	4	3	12	Process being explored to link other systems into the PIA process.	4	3	12	None, new risk added since last report.
R-015	Service Delivery	A Data Protection Officer, as defined by GDPR, is not in place by May 2018	3	3	9	Org redesign work underway and currently due to delivery by late 2017. Monitor timeframes and report on any delays.	2	3	6	None, new risk added since last report.
R-016	Service Delivery	Unable to deliver a robust and user friendly retention schedule which is clear to data subjects and staff.	3	3	9	Options being explored currently.	3	3	9	None, new risk added since last report.