

**LITTLE ABINGTON PARISH COUNCIL GDPR IMPLEMENTATION PLAN**

Work Area	Tasks /Progress	Target Time
<p><b>Raise awareness</b></p>	<p>Councillors, staff, and volunteers, should be made aware that the law is changing. Ensure they undergo training, and that records are kept. They need to know enough to make good decisions about implementation of the GDPR</p> <ul style="list-style-type: none"> <li>▪ <i>GDPR is a standard item on the LAPC meeting agenda. Introductory documents from the ICO have been circulated</i></li> <li>▪ <i>Clerk attended LCPAS training in December 2017 and the CAPALC awareness events in March 2018 and July 2018.</i></li> <li>▪ <i>Clerk completed completed the FutureLearn online course on GDPR</i></li> <li>▪ <i>One parish councillor (IS) attended the CAPALC workshop in July 2018</i></li> <li>▪ <i>One parish councillor (RS) will attend the CAPALC Cllrs training in October. Yet to see if that includes GDPR</i></li> <li>▪ <i>Training through the CAPALC membership scheme awaited.</i></li> </ul>	<p>May 2018-March 2019</p>
<p><b>Assigning responsibility for GDPR</b></p>	<p><b>Consider if you need to appoint a Data Protection Officer.</b></p> <ul style="list-style-type: none"> <li>▪ <i>Based on most recent NALC guidance a DPO is not required</i></li> <li>▪ <i>LAPC has agreed to sign up to the CAPALC GDRP membership scheme</i></li>   <li>▪ <i>The Clerk is responsible for LAPC's compliance with data protection law.</i></li> <li>▪ <i>CWG oversees GDPR on behalf of LAPC</i></li> <li>▪ <i>2017- Clerk was trained in Information Governance and Data Protection to NHS standards</i></li> <li>▪ <i>LAPC has agreed to join the CAPALC GDPR membership scheme</i></li> </ul>	<p>July 2018</p>
<p><b>Carry out Data Audit</b></p>	<p>Review what personal data held in respect of staff and volunteers (including parish councillors), people using council facilities or services, contractors, residents, and more. See <u>Appendix 2 – Sample Personal Data Audit Questionnaire in NALC toolkit</u></p>	<p>In progress. Complete by March 2019</p>

<b>Identify and document your 'lawful basis' for processing data</b>	Awaiting guidance	March 2019
<b>Obtaining consent to use personal data</b>	. Implement NALC toolkit <u>Appendix 3 – Consent Form or similar</u>	Dec 2018
<b>Update Policies &amp; Notices</b>	<p>Have clear, practical policies and procedures for staff to follow, and monitor their operation.</p> <ul style="list-style-type: none"> <li>▪ <b>Privacy Notices</b> – include in LAPC sign off. See NALC toolkit <u>Appendix 4 – Privacy Notices</u></li> <li>▪ <b>Data Retention &amp; Disposal</b> – Agree and implement data retention policy. Inform all data subjects how long you will retain data. When disposing of records and equipment, make sure personal data cannot be retrieved from them. Use Sutton PC or other policy as a model</li> <li>▪ <b>Websites</b> –to confirm security arrangements for Abingtons Website</li> <li>▪ <b>Social media</b> LAPC does not use social medial but some Parish Councillors do</li> <li>▪ <b>Data sharing</b> – confirm what can be shared and make sure it is kept secure when shared.</li> <li>▪ <b>CCTV</b> – N/A</li> <li>▪ <b>Training</b> – awaiting training packages through CAPALC GDPR membership scheme</li> </ul>	<p>Dec 2018</p> <p>Dec 2018</p> <p>Dec 2018 Action?</p> <p>Dec 2018</p> <p>March 2019</p>
<b>Children</b>	<b>Build in extra protection for children –</b> LAPC to review and consider how this element of the policy might apply. The parish council does not work directly with children.	March 2019
<b>External Contractors for Data Processing</b>	<b>Need to assure external data processors have robust processes in place.</b> Not aware of any. PAYE data is provided to HMRC SCDC sends some personal data e.g. in planning applications	March 2019

