

GDPR Project Plan

Appendix 1

following ICO self-assessment checklist & 12 Steps to take now – these are the actions required by APF to work towards GDPR compliance

Action identified	By who	Timescales	Actions completed	Date completed
Data Flow Mapping Exercise	CM	June 2018	Started	
Set up & maintain record of Processing Activities	CM	June 2018	BANES ROPA has a pensions entry. Further meeting with DPO arranged for end of July	
Review any areas where 'Consent' is required eg MSS	SM / CM		MSS consent box added	May 2018
	CM	June/July 2018	Ill Health Retirement member consent required	
Review and amend Privacy Notice	SM	May 2018	Privacy Notice published	May 2018
Memorandum of Understanding to all employers	SM	May 2018	MOU issued to all employers	May 2018
Consider how to meet data portability requirements	Heywood / IT	To be agreed		
Review procedures for dealing with Subject Access Requests & objections to processing & erasing data	KS	To be agreed		
Make up process and carry out Data Protection Impact Assessments	CM / SM	To be agreed		
Review all contracts with 3rd parties and ensure GDPR compliant & write to them / send questionnaire	GC/Legal	Ongoing	Currently reviewing all internal & external contracts to ensure updated to comply with GDPR	
Review processes for transferring data outside Europe	KS	To be agreed	Template discharge forms, produced by LGA, will be updated to include a line that where data is being transferred outside of EU it may be subject to different data protection legislation and that by signing the form the member is agreeing to that. We will adopt the amended forms once available.	
Review Data Held (especially sensitive data) Consider minimisation & Retention Schedule	KS / CM	To be agreed		
Review Data Protection Training for staff, Pension Committee & Board	CM / KS	By end July 2018	All staff have completed e-Learning module Awareness sessions added to Team Meeting agenda	May 2018 May 2018