

GDPR Project Plan

Appendix 6

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 | All | From Nov/Dec 2018 | Awaiting guidance from DPO | |
| 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. Final review by DPO planned Nov/Dec 2018 | Draft August 2018 |
| Review any areas where 'Consent' is required eg MSS | SM / CM CM | Jan/Feb 2019 | MSS consent box added Ill Health Retirement member consent required Further guidance sought from LGA that Fund requires assurance that employers have explicit consent in place | May 2018 |
| Review and amend Privacy Notice | SM | May 2018 | Privacy Notice published | May 2018 |
| Memorandum of Understanding to all Emps | 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 | Partially Complete |
| 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 |