

DATA PROTECTION COMPLIANCE PROGRAMME UPDATE

Purpose

1. This paper updates Members on progress within WLGA with compliance against their data protection obligations for the first part of the 2022/23 financial year.

Background

2. During the first quarter of 2022/23 a new Data Protection Officer (DPO) has been assigned due to the previous post holder going on secondment. The last six months have been used a transition period between DPO's.
3. Members of the Audit Committee are asked to note progress to date and recommendations for areas of focus for 2022/23.

Progress

4. An Information Asset Register and Record of Processing Activity (RoPA) was developed in the previous financial year. A review will be undertaken in the 2nd part of the 2022/23 to ensure its continued accuracy of personal data assets and to capture information in respect of any data transfers outside of the UK.
5. Data Protection Impact Assessments are being used to assess privacy implications and officers' engagement with these processes continues to improve, enabled privacy implications to be considered at the offset of any proposed changes which involve processing of personal data.
6. All WLGA Data Protection policies and procedures remain up to date with current UK law, with the next review of these policies and procedures due to be completed during December 2022.
7. The WLGA's annual registration with the Information Commissioners' Office remains up to date with a review of this due before 5 May 2023. The register entry was updated in April 2022 to reflect the new Data Protection Officer arrangements.

8. No data protection incidents have occurred to date this financial year which have required formal notification to the Information Commissioner.
9. All staff have been provided with e-learning training on GDPR, with new starters continuing to be enrolled onto the training to ensure at all times WLGA are able to demonstrate its controls with providing training to all staff. Current compliance stands at 94%.
10. A new WLGA Privacy Policy has been developed and can be accessed on the WLGA website: [WLGA Privacy Notice - WLGA](#)

Next steps

11. With the transition to a new Data Protection Officer in the first quarter of the year the actions identified in the last committee report remain outstanding. These will be focused on for the remaining of 2022/23.
12. WLGA Senior Management Team should consider relevant controls and actions which could be taken to ensure that all of its staff complete mandatory training before the end of March 2023. This may include consideration of measures such as temporarily locking of system access to ensure all staff complete required training.
13. WLGA Senior Management Team to support the creation of a Training and Communication strategy which will focus on continued training and educational awareness for staff during 2022/23 and 2023/24. This will include mandating requirements for staff training and supplementing training with targeted awareness raising.
14. On 2 February 2022 the Secretary of State laid before Parliament the International data transfer agreement. This is an addendum to the European Commission's standard contractual clauses for international data transfers and will need to be issued to any suppliers used where data is processed in some circumstances. A review of the WLGA Record of Processing Activity will be required during 2022/23 to ensure that data is established in respect of any international data transfers.
15. I recommend that WLGA review and agree the final decision on request processes (including Individual Rights) to enable these to be made available, ensuring WLGA can demonstrate how they comply with the transparency requirements of the UK GDPR.
16. It is recommended that controls be considered in relation to data held on communication platforms such as Microsoft Teams and Zoom. Such controls would provide an opportunity for consistent ways of working, limiting retention of information held and ensure that business critical data is held on backed up record keeping systems.
17. WLGA will need to establish a work plan for obtaining the Cyber Essentials Plus Information Governance certification over the next 12 months. The Cyber

Essentials accreditation is required as part of work delivered on behalf of the Welsh Ministers. Certification with the plus IASME controls will provide additional assurances of the strategic information governance processes in place within WLGA.

Recommendation

18. **Members are invited to note the progress to date and recommended next steps.**

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