

DATA PROTECTION COMPLIANCE PROGRAMME UPDATE

Purpose

1. This paper updates Members on progress within WLGA with compliance against their data protection obligations over the 2021/22 financial year.

Background

2. During the past year focused support has been provided to WLGA on the creation of a record of processing activity, reviews of policies and controls and continued support with new ways of working to ensure controls with any privacy implications associated with these are effectively managed.
3. Targetted emphasis on completion of mandated data protection e-learning training has been carried out during quarter 4 to ensure that WLGA can demonstrate that its employees understand the organisations' and their own responsibilities in respect of data handling.
4. Members of the Audit Committee are asked to note progress to date and recommendations for areas of focus for 2022/23.

Progress

5. An Information Asset Register and Record of Processing Activity (RoPA) has been developed. Further focused support on the RoPA will be required during 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.
6. 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.
7. 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 quarter 1 of 2022/23. The WLGA's annual registration with

the Information Commissioners' Office remains up to date with a review of this due before 5 May 2022.

8. No data protection incidents has occurred during the 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. Whilst there has been a targeted focus on training compliance 100% compliance has not been achieved within the financial year.
10. Data security guidance has been issued to all staff to provide them with information on how to manage data protection and security risks whilst working at home.
11. A new WLGA Privacy Policy, together with service bespoke notices have been developed, however these have not been published. I recommend that WLGA agree the final decision on request processes to enable these to be made available, ensuring WLGA are able to demonstrate how they comply with the transparency requirements of the UK GDPR.

Next steps

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 2022. 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. 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.

16. 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 ISAME controls will provide additional assurances of the strategic information governance processes in place within WLGA.

Recommendation

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

Author: Dave Parsons
Contracted Data Protection Officer
E-mail: dparsons@cardiff.gov.uk