

DATA PROTECTION COMPLIANCE PROGRAMME UPDATE

Purpose

1. This paper updates Members on progress since the last report to the Audit Committee of 18th April 2019 and sets out the compliance work programme and controls in place to continue to improve and strengthen the WLGA's data protection controls.

Background

2. The compliance work set out within the Service Level Agreement for 2019/20 was successfully completed with a programme of continued work and support for 2020/21 agreed.
3. The programme of support for 2020/21 has been impacted as a result of covid-19, with increased support being required around business change and services which have been impacted as a result of the pandemic, particularly for services which have resulted in changes to the way in which the processing of personal data takes place.

Progress

4. Since the report to Committee in April 2019 a number of compliance actions have been introduced to strengthen the WLGA's technical IT infrastructure controls, particularly following a number of high profile cyber phishing attacks during 2018/19.
5. A Record of Processing Activity has been developed with recommendations for any improvements to personal data assets provided to the Senior Management Team.
6. The Senior Management Team have signed off all recommendations provided and these have been used to determine the programme of support work for 2020/21 to focus on the key improvement actions and controls in respect of processing of special category data.
7. All staff within the WLGA have received data protection training through attendance at onsite training which took place during September and October

2019, with further virtual update webinars being planned for December and January 20/21.

8. All staff have been provided with e-learning training on GDPR, with any new starters being enrolled onto the training to ensure at all times WLGA are able to demonstrate its controls with providing training to all staff. Current compliance with completion of the training is 70%, with only a small number of staff still to enrol and start the training. This however is an area where WLGA need to target 100% as soon as possible, as in the event of any data protection incidents the Information Commissioner would potentially query why mandatory training has not been completed.
9. An awareness campaign in relation to phishing was released during 2019. This demonstrated a need for improved education and communication with officers of the importance of looking out for suspicious email communications.
10. No Data Protection security incidents have occurred during the past 12 months which have required notification to the Information Commissioners Office.
11. A new WLGA Privacy Policy, together with service bespoke notices are currently being developed, with the Senior Management Team expected to sign off and then publish these over the coming months, thus improving compliance with WLGA's transparency requirements.
12. Significant data protection considerations and strengthened controls have been adopted over the past months in particularly around the Wales Strategic Migration Partnership, National Autism Service and Member Development Programme.

Next steps

13. A review of the WLGA data protection policies will be completed during October 2020 to ensure their continued compliance with the Data Protection Act and any changes which may be impacted as a result of Brexit. These will be provided to Senior Management Team for agreement and may be revisited dependant upon any Brexit implications with regards to data flow arrangements.
14. All staff enrolled on the WLGA e-learning training platform will be required to have completed the data protection training module before the end of November 2020.
15. To supplement the e-learning training and further demonstrate controls in place for supporting staff, a number of webinars will take place during the Autumn and winter of 2020. Staff attendance will be monitored with the Senior Management Team.

16. As part of the proposed service between Welsh Government, Academi Wales and WLGA for the Member Development Programme, WLGA are required to obtain the Cyber Essentials accreditation before February 2021. A programme of work will be established to ensure WLGA are able to demonstrate controls in place to obtain the accreditation.

Recommendation

17. **Members are invited to note the progress to date.**

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