

TO: Policy and Resources Committee

FROM: Head of ICT – John Fagg

PRESENTING OFFICER(S): Deputy Chief Executive – Matthew Warren

Telephone 01480 444580

john.fagg@cambsfire.gov.uk

DATE: 28 September 2017

GENERAL DATA PROTECTION REGULATION IMPLEMENTATION - PROJECT UPDATE

1. Purpose

- 1.1 To present the Policy and Resources Committee with an update on the work being undertaken to prepare the Authority for compliance with new European Union General Data Protection Regulation (GDPR), that comes into force in May 2018.

2. Recommendation

- 2.1 The Policy and Resources Committee is asked to note the contents of this report.

3. Risk Assessment

- 3.1 **Political/Economic** – should the Authority not prepare itself for GDPR compliance it will face reputational damage and thereafter significant financial penalties if it fails to protect data adequately.
- 3.2 **Social/Legislative** – the Authority has a moral duty to ensure it handles its data in accordance with the prevailing legislation.

4. Background

- 4.1 Cambridgeshire Fire and Rescue Service (CFRS) currently comply with the requirements of the Data Protection Act (1998). This Act is being replaced with the GDPR which comes into force on 25 May 2018.
- 4.2 The GDPR takes into account the significant advances in digital systems, placing more responsibility on organisations to protect personal data and imposing greater fines where data is not adequately protected. Attendance at briefings and initial research has shown that a significant amount of work is

required across CFRS departments to ensure that the organisation is compliant with its legal obligations under the GDPR.

- 4.3 Significant fines can be imposed by the Information Commissioner's Office (maximum of €20M or 4% of annual turnover, whichever is greater) for failure to protect data as per the GDPR requirements. The Authority is ultimately responsible for compliance and failure to protect data could have a significant reputational impact if a breach were to occur. With cyber security incidents on the rise nationally, the risk of a security breach leading to data leakage is possible.
- 4.4 The Head of ICT was appointed as the Project Manager for the required work and is responsible for driving the activities forward.

5. Activities Undertaken to Date

- 5.1 The following training has been undertaken as part of the preparations;
- Three members of staff have received training to GDPR Practitioner level,
 - GDPR Awareness Training has been arranged for Heads of Group on 26 September 2017,
 - An eLearning course is being developed for use on the CFRS iLearn portal.
- 5.2 An Information Governance (IG) Board has been set up which the Deputy Chief Executive will Chair as the Senior Information Risk Owner. During the project, the IG Board will form part of the Project Board as membership is the same. The first meeting is scheduled for 11 October 2017 where documents drafted/amended for approval by the Board are their Terms of Reference (new), Data Retention Policy (new), Information Security Policy, Data Classification and Management Policy (new) and the Data Protection Policy.
- 5.3 A Consent and Privacy Notices Working Group and an Information Sharing Agreements Working Group have been formed and had their initial meeting.
- 5.4 A Data Protection Impact Assessment (DPIA) template has been created and trialled by the Media and Communications Team; all DPIAs will require sign off by the IG Board.
- 5.5 Heads of Group have been requested to complete a data questionnaire to enable the scope of work required to be estimated. A workshop to discuss the returns is scheduled for 18 September 2017. It is anticipated that further data sets will come to light as the project progresses.
- 5.6 A Data Protection Officer mailbox has been created.
- 5.7 A Business Analyst from the STEP team has been made available to assist with process mapping.

- 5.8 An initial meeting with Civica has been held to discuss our Community Fire Risk Management Information System and specifically the storage of personal data relating to members of the public in the context of our community safety activities.

6. Activities to Progress

6.1 The following activities are to be progressed;

- Subject Access Request (SAR) Working Group to be formed to agree the process and responsibilities for dealing with SARs post 25 May 2018. The first meeting is likely to be in January 2018 (due to resource constraints).
- SAR Policy/Procedure to be drafted.
- Technology Working Group to be set up to discuss any technology controls/changes to meet GDPR requirements. The first meeting is likely to be in November 2017 (due to resource constraints).
- DPIAs to be completed for all data sets held; this will be the most resource intensive task.
- Data Breach Policy/Procedure to be drafted.
- Work with partner agencies to ensure that data sharing is GDPR compliant.
- Data Quality Strategy to be drafted, approved and implemented.

7. Summary

- 7.1 Much progress has been made in setting the foundations on which the remaining work can be completed. There is significant work involved in the completion of DPIAs which will help in the understanding of the risk that the data collection and use poses to the Authority and to the Data Subjects. This will involve staff from across the organisation.
- 7.2 There will undoubtedly be a requirement to change working practices in a number of areas within CFRS and this may also take significant resource.

BIBLIOGRAPHY

Source Documents	Location	Contact Officer
Background Information	www.ico.org.uk www.eugdpr.org	John Fagg Head of ICT John.fagg@cambsfire.gov.uk 01480 444580