2017/2018 RISK REGISTER
Risk Management Action Plan No: 1
Champion – Ian Curtis

Issue Description	Data Breaches
Corporate Priority	Value for money

EXISTING CONTROLS IN PLACE
✓ Data Assurance Policy ✓ Compulsory iPool Training ✓ Shredding of discarded personal Information ✓ Previous Corporate Training ✓ Website Publishing Hierarchy / Level of Controls ✓ ICT Security Policy ✓ Data Retention Policy ✓ Automatic Screen Lock ✓ Regular Password Updates ✓ Secure print facility / printing reports.

Required action / control	Responsible for action	Critical success factors / update	Due Dates
Implement recommendations from recent Data Breach	Ian Curtis & Management Team	Improve data protection competence and understanding through a programme of training on the principle and practical application of data protection from the level of middle management upwards, with external facilitation to be considered. **Update: complete.**	March 2018 (Training delivered in the context of GDPR)
	Allan Oldfield / Ian Curtis	Reinforce confidence in the council as an organisation that is committed to protecting personal information by carrying out a self-assessment of DPA compliance with a view to inviting the ICO to carry out a Data Protection Audit, and by the Chief Executive signing the Personal Information Promise. **Update: complete.**	September 2017
	Allan Oldfield / Gary Marcus	Include a regular item about data protection on the agenda of the Management Team/Middle Managers meeting and continue to include it on the agenda of the Strategic Risk Management Group. **Update: complete & ongoing.**	June 2017
	Ian Curtis	Amend the council's Data Assurance Policy to make it clear that it is permissible to transfer personal data to countries outside the EEA where an adequate level of protection is in place that would satisfy the eighth data protection principle **Update: complete.**	September 2017

Hardcopy Information	Allan Oldfield	As a council, there needs be a reduction in the printing of information. This reduces the risk of information being lost and misplaced. **Update: printing has reduced significantly, but this will be an ongoing task.**	March 2018
Training & Education for Staff/Members	Tracy Morrison/ Ian Curtis	Tracy Morrison / Ian Curtis to attend refresher training around Data Protection. **Update: complete.**	December 2017
	Ian Curtis via MDSG	Introduce elected members to Data Protection training. Not all data breaches are electronic. Education around paper data is also advisable. **Update: complete.**	December 2017
	Allan Oldfield	All Staff to complete mandatory iPool module in relation to Data Protection. **Update: complete.**	September 2017
Data Cleansing	Management Team	Introduce initiatives to remove information that is no longer needed in conjunction with our Data Retention Policy. **Update: the newly introduced GDPR regulations require the council to carefully manage data. GDPR requirements are overseen by a Corporate GDPR Group and through regular updates to management Team.**	September 2017
	Corporate Service Team	Champion and police the Data Retention policy. Carry out checks on files and folders to ensure data no longer needed is deleted. **Update: complete & ongoing.**	Annual Action Check
All Staff E-mail	Simon Stott	Provide support on removing the 'All Staff' option from appearing automatically when typing 'Al'. **Update: function not removed, but training given on how to stop it - complete.**	June 2017
How Public Data is stored / displayed	Ian Curtis/Heads of Service	Review storage and display of public information. Some things are stored on the website such as planning applications that contain people's names. **Update: complete.**	December 2017