



## **Internal Audit Position Statement**

### **IT GDPR Post Implementation**

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## Position Statement as at 4<sup>th</sup> September 2018

### 1 Introduction

1.1 The General Data Protection Regulation came in to effect from the 25<sup>th</sup> May 2018. The Council has made good progress for the change in Data Protection Legislation and whilst much work has been done there are elements that are work in progress.

### 2 Scope

2.1 To comply with GDPR the council need to embed 6 privacy principles within the council's operations and the audit focused on these principles. The principles give a top level overview of the areas covered by the new regulation.

### 3 Outcomes

3.1 Implementation of GDPR is a big project and therefore there are elements such as training that have been fully implemented and imbedded within the council while others such as appointment of a Deputy Data Protection Officer are still to be determined. Internal Audit have found the following to date:-

- Data Protection and Policies are in place but need to be reviewed which is to be undertaken by a new member of staff in Legal. This process is to look at improvements and remove duplicates across the council.
- Staff Training has been completed for all Members and Staff across the council.
- Data Protection audits schedule has been produced and audits were started to be carried out by the Data Protection Officer.
- The Divisional Manager for Democratic Services has been appointed as the council's Data Protection Officer and he has completed a relevant qualification so as to be "suitably qualified" as required by the GDPR to carry out that role.
- Privacy Impact Assessments are placed on the council's internet site.
- Data Processing Register is in place and is the responsibility of the Data Protection Officer who reviews this monthly.
- Data minimisation, pseudonymisation and transparency is a working progress as some systems are able to redact information and others require additional work.
- Legal are currently working with services who receive letters from companies with regards data handling this is an ongoing process.
- Data Breaches are reported via formal report by the Data Protection Officer, to the Chief Executive and Members and Director of Corporate Services and annual meeting are to be held with the PSN Compliance Officer.

3.2 Internal Audit will test later in this financial year and report on the progress made.