RAG	Action and completion status	**Agreed Action**	**Owner:**	**Due by**	**progress**
AG	A02	The Data Protection Policy, Information Security Management Policy and Records Management policy reviewed on an annual basis. Any changes to be communicated via Beacon.	SIGO	Apr-16	Completed
AG	A03	Ensure the induction checklist is completed within two weeks of employment for new staff (see also b12).	SIGO	Jan-16	Completed
AG	A04	Amend the Service Area induction checklist to include the requirement to read the Records Management Policy and Information Security Policy.	Training Design & Delivery Manager	Mar-16	Completed
AG	A05	Review guidance documentation promoting data protection compliance and review periodically thereafter.	SIGO	Dec-16	Staff IG Handbook completed addition guidance to be considered
AG	A06	Finalise, publish and communicate the toolkit documents	SIGO & Internal Communications Officer	Apr-16	IG Handbook launched
AG	A08	Appoint SIGO and second IGO	Legal services Manager	Jan-16	completed- SIGO - 29/03/16; Second IGO Nov 2015
AG	A12	Set out duties and responsibilities of SIRO and formally reference in relevant policies.	SIGO	Apr-16	Completed in policies reviewed so far
AG	A13	Identify IAOs, set out duty's and responsibilities of IAOs and communicate to IAOs, reference role/responsibly within relevant policies & procedures.	SIGO	Sep-16	Roles to be incorporated in risk management policy, staff hand book and IG Toolkit after
AA	A14	Recruit Records Manager or the duties are assigned to an appropriate role/roles	Legal services Manager/ Programme	Nov-16	In the process of recruiting interim Record Manager
AG	A16	Draft Terms of reference for the IMSG for approval by the group.	Legal Services Manager	Jan-16	Completed

RAG	Action and completion status	**Agreed Action**	**Owner:**	**Due by**	**progress**
AG	A17	Create action plan to ensure key deliverables with Information Management- Bringing it together document are achieved.	SIGO & Programme Manager Transformation	Apr-16	Completed
AA	A18	Draft an Information Risk Policy	SIGO	Dec-16	In progress - working on risk management approach
AA	A19	Ensure that information asset register is up to date and that is regularly reviewed to identify residual risks which require escalations.	SIGO/ Transformation delivery programme Manager	Dec-16	Information asset register has been developed but risk management approach yet to be developed
AR	A20	Create information risk register to capture (IRR) , record and track information related to risks identified via the IAR, security incidents and PIAs.	SIGO/ Head of ICT Strategy	Oct-16	Yet to complile IRR- Records Manager to provide support in this area
AR	A21	Information Risk register to be considered by SMB.	SIRO	Nov-16	Yet to compile IRR
AR	A22	IMSG to approve Information Risk Register and review on a quarterly basis.	SIRO	Sep-16	Yet to compile IRR
AA	A25	To follow up on data protection audit in 2013/14. To include specific data protection audits within the audit plan 2015/16 & future audit plans.	Chief Internal Auditor	Feb-17	In progress
AG	A26	To include data protection/Information governance control issues within the Annual Governance Statement.	Chief Internal Auditor	Apr-16	Completed
AG	A27	SIGO to conduct periodic spots checks to monitor compliance with information governance policies and results to be reported to ISMG.	SIGO	Apr-16	Being conducted on a continual and ad hoc basis

RAG	Action and completion status	**Agreed Action**	**Owner:**	**Due by**	**progress**
AA	A28	To include statistics in relation to information security incidents and training completion within annual report.	SIGO	Dec-16	Security incidents and training completion being monitored
AG	A29	IMSG to monitor KPIs re completion statistics, training completion & information security incidents on quarterly basis.	Legal services Manager/ SIGO	Implemented Nov. 2015	completed
AG	A31	a) Communicate the requirement for staff to carry out mandatory PIAs for any new service or change in service which involves the processing of personal data to all senior Managers. b) Amend the responsibilities for Line Managers document within the toolkit to include the requirement for mandatory PIAs.	a) SIRO/ b) Legal services manager	Implementation date: a) January 2016. B)	Included in IG handbook and relevant policies
AG	A33	Introduce PIA template based on ICO's Conducting Privacy Impact Assessments Code of Practice.	SIGO	Jun-16	Completed
AG	A34	SIGO to be a signatory to all PIA's and register of PIA's to be maintained.	SIGO	Jun-16	Completed
BG	B01	Include responsibility for ensuring that staff are adequately trained in relation to data protection to the roles and responsibilities of the SIRO.	SIGO	Apr-16	Completed
BG	B02	Oversight of data protection training to be included within the Terms of Reference for the IMSG.	Legal Services Manager	Jan-16	Completed
BG	B03	IMSG to approve content of training and monitor training statistics to ensure that training is being completed.	SIGO	Jun-16	Training being monitored
BG	B04	SIGO to report on training completion statistics to IMSG on a quarterly basis.	SIGO	Implemented Nov. 2015	Monitoring reports from learning and development
BG	B05	SIGO to conduct a training needs analysis for members of the Information Governance Team.	SIGO	Aug-16	Completed and relevant training completed, ongoing or scheduled

RAG	Action and completion status	**Agreed Action**	**Owner:**	**Due by**	**progress**
BA	B08	Amend DP E-Learning to include a module on Subject Access requests.	SIGO/ Training Design & Delivery Manager	Oct-16	In progress- e- learning being developed
BA	B09	Review and consolidate the e-learning and classroom based modules to ensure all key data protection learning elements are delivered to all relevant staff.	SIGO/ Training Design & Delivery Manager	Oct-16	In progress
BG	B12	Recommendation partially accepted. **1)** Communication to all senior managers that DP E- Learning must be completed by all new employees within 2 weeks of commencing employment. **2)** Responsibilities for Line Managers document within toolkit to be amended to include requirement that new starters complete DP E-learning within 2 weeks of commencing employment. **3)** Induction Checklist to be amended to include the requirement to complete the DP E-learning within 2 weeks of commencing employment.	**1)** SIRO **2)** Legal Services Manager **3)** Training Design & Delivery Manager	**1)** January 2016 **2)** Amendment made December 2015 **3)** March 2016	Completed
BG	B13	IMSG to consider conducting data protection refresher training on an annual basis following amendment to training as above.	IMSG		Agreed
BG	B14	Include requirement to complete mandatory e-learning training and condensed mandatory training within Data Protection Policy.	SIGO	Aug-16	Completed
BA	B16	Develop specific training for IAO's, SARs, handlers and staff involved in data sharing - Also "Recording with care training"	SIGO/ Training Design & Delivery Manager	Dec-16	In progress- SAR and Information Sharing content has been finalised
BG	B17	As part of training needs analysis at recommendation B6 to arrange for IGOs to attain BCS Certificate in Data Protection.	SIGO	Apr-16	Completed
BA	B18	Information regarding staff who have not completed the DP training to be provided to SMB and cascaded to all managers on a quarterly basis.	SIGO/SIRO	Dec-16	Reports being created
BG	B20	Training completion statistics to be reported quarterly to IMSG.	SIGO	Implemented Nov	Being reported

RAG	Action and completion status	**Agreed Action**	**Owner:**	**Due by**	**progress**
BG	B22	Refresh & re-launch Don't Gamble with Data Campaign to launch the 'toolkit.'	SIGO/ Internal Communications officer	Sep-16	IG Handbook completed- launch date 20/10/2106
CA	C01	SIGO to be a signatory on all Data Sharing Agreements and to maintain a register of all DSA's. All DSA's to be reviewed annually. SIGO to report IMSG on DSA Agreements and Reviews on a	SIGO	Dec-16	Process included in the IG Staff handbook and procedure has been developed. DSAs yet to be
CA	C02	SIGO to conduct periodic spot checks across the council to ensure that systematic data sharing decisions are being recorded on relevant case files.	SIGO	Dec-16	Some spot checks have been completed
CA	C05	Amend the DP E-learning training to include basic guidance on data sharing.	SIGO	Oct-16	Content included in refresher training to be added to DP E-Learning training
CA	C06	Develop specific training for those with Data Sharing responsibilities with a requirement that such training is completed every 2 years.	SIGO/ Training Design & Delivery Manager	Dec-16	Data Sharing content developed
CG	C07	1) Action: Amend Data Protection policy to include summary of key points in respect of data sharing & one- off disclosures. 2) Action: Draft data sharing policy and Guidance in accordance with ICO Data sharing code of practice.	**1)** SIGO **2) SIGO**	1) April 2016 2) July 2016	Completed
CG	C09	**1)** Draft corporate privacy notice to be published on website. **2)** Review fair processing notices used throughout the council.	**1)** SIGO **2)** SIGO	**1)** April 2016 **2)** Dec 2016	Completed
CG	C10	Draft consolidated fair processing notice for website.	Legal Services Manager	Feb-16	Completed
CA	C11	Undertake a review of all DSA's to ensure the incorporate fair processing, consent & exemptions where relevant.	SIGO	Dec-16	In progress
CA	C12	Undertake a review of all DSA's to ensure they cite applicable conditions for fair processing or exemptions.	SIGO	Dec-16	In progress

RAG	Action and completion status	**Agreed Action**	**Owner:**	**Due by**	**progress**
CA	C13	Review all DSAs to ensure that it is a requirement to record that consent has been obtained/overridden and why.	SIGO	Dec-16	In progress
CA	C15	Review all consent forms to ensure that they explain circumstances in which personal data may be shared without consent and that consent may be withdrawn.	SIGO	Dec-16	In progress
CG	C17	Include within the Data Sharing Policy requirement that PIA completed in relation to all DSAs.	SIGO	Jul-16	Completed
CG	C18	Awareness of Corporate PIA template to be raised through Don't Gamble with Data Campaign & Data sharing policy.	SIGO	Jul-16	Completed
CR	C19	Review CISP to ensure it remains fit for purpose and clarify whether data controllers who are not signatories to it but wish to enter into a DSA are required to become signatories to CISP of confirm adherence to it.	SIGO	Sep-16	To identify current partners and review initial purposes of the protocol
CG	C20	Publish DSA template on intranet.	SIGO	Jul-16	Completed
	C21	Review all DSAs to ensure compliance with ICO Data Sharing Code of Practice.	SIGO	Dec-16	Ongoing
CG	C23	Amend DSA template to incorporate statement of compliance and include in existing DSAs on review.	SIGO	Sep-16	Completed
CA	C24	SIGO to be added as a signatory to all DSAs and to ensure that all signatory sections are completed prior to being logged on central list.	SIGO	Dec-16	Ongoing
CA	C25	DSAs to be reviewed on annual basis/ SIGO to keep record of review dates and dates completed.	SIGO	Dec-16	Review dates are incorporated within the DSA register
CA	C26	SIGO to maintain a register of all DSAs to be reviewed bi-annually by IMSG.	SIGO	Dec-16	Ongoing
CG	C27	Include within Data Sharing Guidance, requirements of Government security classifications. Requirement to use classification to be incorporated into DSAs.	SIGO	Sep-16	Completed
CG	C28	Revise DSA template to provide clarity as to which sections need to be amended to provide specific details.	SIGO	Sep-16	Completed

RAG	Action and completion status	**Agreed Action**	**Owner:**	**Due by**	**progress**
CA	C30	As part of review of DSAs, ensure current methods of sharing information captured.	SIGO	Dec-16	Ongoing
CA	C31	As part of review of DSA, ensure they specify relevant job roles/teams at each organisation that will be responsible for	SIGO	Dec-16	Ongoing
CA	C33	As part of review of DSAs, ensure that they should specify what steps should be taken to report, investigate and resolve incidents	SIGO	Dec-16	Ongoing
CA	C34	As part of review of DSAs, ensure the relevant job roles and contact details for incident management leads are included	SIGO	Dec-16	Ongoing
CA	C36	Ensure that all DSAs record whether data to be shared is factual/opinion and to distinguish between the two.	SIGO	Dec-16	Ongoing
CG	C37	Amend DSA template and all existing DSAs to ensure that parties inform each other when shared data has been amended or updated.	SIGO	Sep-16	Completed
CG	C38	Amend the DSA template and existing DSAs to ensure they contain specific provisions re ensuring the quality of the data shared	SIGO	Sep-16	Completed
CA	C39	Define and document retention periods within DSA and ensure relevant managers record on data controllers system	SIGO	Dec-16	Ongoing
CG	C40	Amend DSA template and all existing DSAs to include disposal dates for the shared data	SIGO	Sep-16	Completed
CG	C41	Amend DSA template and all existing DSAs to contain specific provisions re organisations providing assurance of disposal to each	SIGO	Sep-16	Completed
CG	C42	Draft procedure for dealing with one-off requests for disclosure, to be promoted via Beacon, Don't Gamble with Data Campaign	SIGO	Dec-16	Completed
CG	C43	Ensure that procedure for third party requests for information are received in writing	SIGO	Dec-16	Completed

RAG	Action and completion status	**Agreed Action**	**Owner:**	**Due by**	**progress**
CG	C45	Within Procedure for dealing with third party requests for information, build in requirements for confirming identity of requesters	SIGO	Dec-16	Completed
CG	C47	Create a single corporate log for all one -off requests for disclosure, identity of requestor, exemptions, tracking information	SIGO	Dec-15	Completed
CG	C48	SIGO to report to IMSG on a quarterly basis the number of one-off requests for disclosure	SIGO	Dec-15	Completed
CG	C49	SIGO to carry out "spot- checks" on the quality of one-off disclosures to ensure quality assurance.	SIGO	Dec-16	Included in work plan and have already checked on CCTV and WA170 requests procedure

	Jun-16	Oct-16
Red (Yet to commence)	20	4
Amber (On-going)	49	27
Green (Completed)	8	46