



Creating a safer  
**Cambridgeshire**

**To:** Business Coordination Board

**From:** Chief Constable

**Date:** 01 November 2018

**Data Protection Reform Update.**

**1. Purpose**

1.1. The purpose of this briefing is to update the Business Co-ordination Board (“the Board”) regarding the current position of Data Protection compliance across BCH.

**2. Recommendation**

2.1 The Board is invited to note the contents of this report.

**3. Background**

3.1 The new Data Protection legislation became law on the 25th May 2018.

3.2 The new legislation takes into account of the European Union General Data Protection Regulation (GDPR) which is covered in Part Two of the Act and the European Union Law Enforcement Directive (LED) which is covered in Part Three.

3.3 All organisations must comply with Part Two and all police forces must also comply with Part Three for processing of Law Enforcement information.

3.4 Throughout 2018 BCH Data Protection Reform project team set up the processes required to obtain compliance with the new legislation. The project is now closed and compliance is now business as usual for the Information Rights and Assurance teams.

## **Current status**

### **ICO Data Protection Self- Assessment Toolkit**

- 3.5 The ICO issued a 242-item GDPR-compliance toolkit to assist Authorities in monitoring the areas of non-compliance.
- 3.6 184 actions have been closed after being fully compliant with supporting evidence (91%). There are 24 actions (9%) graded as amber where further progress is required.
- 3.7 The areas of non-compliance centre on three key areas; ten relate to CCTV documentation, eight on the Information Asset Register and six relate to Information Sharing Policy documentation.
- 3.8 The areas of non-compliance are being reviewed and actioned.

### **Information Asset Owner (IAO)**

- 3.9 36 IAOs have been identified across BCH along with over 60 Information Asset Assistants. All have received training by Information Management Department staff.
- 3.10 An Information Asset/Data Quality Governance structure has been approved and embedded across BCH.
- 3.11 Each force has appointed a strategic lead to act as a Senior IAO (SIAO) and it is their responsibility to ensure that all information risks and issues are raised through their respective force meetings up to the BCH Information Management Board (IMB).
- 3.12 On-going refresher training packages have also been prepared and will be delivered to IAOs as part of a programme of continual improvement and support. Venues for IAO refresher training courses are booked to start in January 2019.

### **Information Management (IM) Self-assessment audit**

- 3.13 After their training all IAOs were sent an Information Asset Audit to self-assess and identify all Information Assets within their business area.
- 3.14 The responses from these Audits feed the BCH Information Asset Register which currently holds 505 Information Assets.
- 3.15 22 business areas have completed and returned their Information Asset Audit, leaving 9 business areas outstanding. The IAOs responsible for these business areas have been engaged with by the Information Rights and Information Assurance teams to ensure the completion of the final audits.

### **Data Protection Awareness Training**

- 3.16 In line with ICO guidance Data Protection training has been made mandatory for all officers and staff to complete. Training will be delivered at different levels depending on roles:
  - All BCH staff and officers are to complete the new College of Policing (CoP) Data Protection e-learning package in the next 12 months and the refresher every 2 years thereafter. Currently 90% of BCH staff have completed Data Protection training within the last 12 months.

- Departments, such as Public Protection and Occupational Health who have been assessed to regularly deal with sensitive disclosures of personal information are required to complete this training on an annual basis.
- All Data Protection practitioners within IMD will receive bespoke Data Protection training which will be delivered by the College of Policing.

#### **4. Next period**

- 4.1 The Information Rights team to continue to co-ordinate IAO training sessions, manage the Information Asset Register, audit and complete the actions of the tool kit. The team will support all business areas and in particular high risk areas where audits may take longer to complete due to complexity.
- 4.2 Report progress of the audit and tool kit to the SIRO through the Information Management Board
- 4.3 Risk assess all BCH assets to identify any measures needed to ensure processing, protecting and sharing data is in line with legislative requirements.
- 4.4 The Information Rights team continues to produce and implement revised Data Sharing and Processing Agreements, Privacy Notices and Data Protection Impact Assessments.
- 4.5 The Information Assurance team continue to raise awareness of the importance of Data Protection and security related matters through the use of Meta-Compliance and the force intranets.

#### **5. Summary**

- 5.1 Data Protection compliance continues to progress. The areas that require additional time and resources have been identified and supported with the details regularly reported to the Information Management Board.
- 5.2 It is anticipated that all outstanding areas of non-compliance will be resolved by the end of this calendar year.

#### **6. Recommendation**

- 6.1 The Board is invited to note the contents of this report.

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