

SCRMCA Recommendation Status Report - GDPR (Overall audit opinion - Limited)

Year & Period due	Audit Report Title, Recommendation Number and Recommendation Title	Recommendation - Description	Priority	Theme	Status	Target Impl. Date	Original Target Impl. Date	No of Date Revisions	Agreed Management Action	Action Manager	Auditor
2019/20 Q1	SCRMCA/SYPTE - Compliance with GDPR - R1 - Registration with ICO	Confirmation should be sought from ICO that the DPO is registered and, if not, the DPO should urgently register with them. The Privacy Notices for both organisations should be updated to include the ICO registration details.	Fundamental	Legal	Complete	31-May-2019		0	The DPO is now registered with ICO for the SCRMCA and evidence has been provided to Internal Audit. https://ico.org.uk/ESDWebPages/Entry/ZA092329 The Privacy Notices have been updated to include the ICO registration details	Head of IT	Caroline Hollins
2019/20 Q1	SCRMCA/SYPTE - Compliance with GDPR - R5 - Board Updates	An update report should be presented to Members of SYPTE's Management Board / Executive Board to provide assurance that the areas of partial / non compliance have been or are being addressed. Periodic updates should be scheduled thereafter, ensuring that Members are fully informed of outstanding actions, areas of partial / non-compliance and the implications.	Merits Attention	Information Governance	Complete	30-Jun-2019		0	SYPTE - Report was submitted to the Executive Board 22 May 2019. SCRMCA – A verbal update was given to the Statutory Officers Group in May 2019 confirming that annual refresher training for GDPR had been rolled out and that a 19/20 action plan to ensure continued compliance would be developed. Updates have been scheduled for July, Oct, Jan & Apr.	Principal Solicitor & Secretary to the Executive	Caroline Hollins
NOT YET DUE											
2019/20 Q1	SCRMCA/SYPTE Compliance with GDPR - R4 - Action Plans	The potential areas for change / improvement identified during this review should be considered to improve the functionality of the Action Plans in addressing outstanding actions and achieving full compliance with GDPR requirements.	Significant	Information Governance	Partially complete	31-Aug-19	30-Jun-2019	1	SCRMCA – Acknowledge the need to review action plan which has suffered due to lack of resources. Issue being addressed from May 2019 action plan to be developed for 19/20 and SharePoint utilised to ensure timely updates and version control by 31st Aug 19. SYPTE – The action plan is version controlled in SharePoint. Both organisations intend to update the action plan twice yearly.	Deputy Managing Director	Caroline Hollins
2019/20 Q3	SCRMCA/SYPTE - Compliance with GDPR - R2a - Roles and Responsibilities	The roles and responsibilities for GDPR (including SIRO and Information Governance) should be clarified and then clearly defined within the relevant Job Descriptions.	Significant	Managing People	Not Yet Due	30-Nov-2019		0	2a) The roles and responsibilities for GDPR (including SIRO and Information Governance) will be clarified and then clearly defined within the relevant Job Descriptions	Deputy Managing Director	Caroline Hollins
2019/20 Q3	SCRMCA/SYPTE - Compliance with GDPR - R2b - Roles and Responsibilities	Confirmation should be provided to ensure that the assigned roles and responsibilities of the Data Protection Officer have been clearly defined within the related Job Description.	Merits Attention	Managing People	Management Assurance Process	30-Nov-2019		0	2b) Agreed. The DPO is aware of the requirements and is awaiting wider changes to be made to the Job Description related to SCR governance.	Principal Solicitor & Secretary to the Executive	Caroline Hollins
2019/20 Q3	SCRMCA/SYPTE - Compliance with GDPR - R3 - Evidence to Support Assessments	Evidence should be retained / signposted to for all future actions that are signed off as "green" i.e. fully compliant.	Merits Attention	Information Governance	Management Assurance Process	30-Nov-2019		0	This is to be considered by the SIRO and actioned further if required.	Head of IT	Caroline Hollins