

## Audit Committee Meeting

Date of Meeting	Tuesday 8 October 2019
Paper Title	GDPR – Annual Review
Agenda Item	11
Paper Number	AC1-I
Responsible Officer	Jim Godfrey, Finance & Resources Director
Status	Disclosable
Action	For information

### 1. Report Purpose

- 1.1. Note the progress report re GDPR.

### 2. Recommendations

- 2.1 The Committee is invited to **note** the report.

### 3. Evaluation of GDPR

- 3.1. GDPR is an important issue for GCRB and all three colleges in Glasgow and for GCRB. Previous reports have outlined progress in respect of GDPR and the collaborative approach to Data Protection.
- 3.2. Members may recall that a report was provided to this Committee in October 2018. The report provided to this Committee meeting provides a review of progress
- 3.3. Under the guidance of Mairead Wood (Data Protection Officer), the Executive Team has been working to implement the agreed action plan.

### 4. Progress Against Agreed Actions

- 4.1. Mairead Wood will attend the meeting of the Committee to provide an overview of progress and answer questions. A summary of progress is provided in the table below:

Action	Update
Undertake an audit of all data held by GCRB.	Complete - approved by Board.
Prepare and publish a Privacy Notice.	Complete - published on the GCRB website - <a href="http://www.gcrb.ac.uk/sites/default/files/GCRB_PrivacyNotice-2019.pdf">http://www.gcrb.ac.uk/sites/default/files/GCRB_PrivacyNotice-2019.pdf</a>
Create an Information Asset Register (IAR) in accordance with Article 30.	Record of Processing Activity (ROPA) in place - GCRB working through 'living document'.
Produce a data retention schedule.	Schedule is in place, which GCRB is working through.
Prepare a data risk register.	The register is complete and will be updated/managed as required (DPO review monthly).
Address the training needs of GCRB Executive Team.	Basic training complete with annual training proposed going forward.
Review Data Sharing Agreements (DSAs).	Ongoing with a focus on getting formal agreements in place for 'in-kind' services with Colleges (e.g. payroll provision).
Produce Data Protection Policy.	Policy draft and to be considered by GCRB Audit Committee in October 2019.
Produce Data Breach Policy.	Complete.
Produce Subject Access Request (SAR) Policy.	Policy drafted and scheduled for completion in December 2019.
Produce Freedom of Information (Scotland) Act (FOISA) policy.	GCRB publishing FOI request handling procedure.
Produce Data Protection Impact Assessments	Procedure and template complete.
Produce IT Security Policy	GCRB will use CoGC Policy (in draft) as it uses CoGC IT Infrastructure.
Compliance with legislation and best practice	Ongoing.

## **5. Risk Analysis**

- 5.1.** The approach outlined above has enabled GCRB, and the Glasgow Region, to address the risks posed by the regulations in respect of Data Protection and GDPR. In particular, the risk that “There is a breach of legislation/guidance/code of practice and this results in a failure of governance”.

## **6. Equalities Implications**

- 6.1.** There are no equalities implications as a direct result of this report.

## **7. Legal Implications**

- 7.1.** The duties and responsibilities in respect of GDPR are detailed in the relevant legislation. Failure to comply with the legislation, relating to GDPR, carries significant financial consequences.

## **8. Resource Implications**

- 8.1.** The primary cost associated with the implementation of the recommendations is the cost of staff time.

## **9. Strategic Plan Implications**

- 9.1.** Compliance with relevant legislation is clearly an obligation for GCRB. Whilst GDPR creates an additional administrative burden this is offset by some benefits that might contribute to the achievement of the region’s ambitions. Such benefits may include; improved learner confidence and enhanced cyber security.