

Board of Management Audit & Assurance Committee

Date of Meeting	Wednesday 26 May 2021
Paper No.	AAC4-D
Agenda Item	5.3
Subject of Paper	Data Protection Update
FOISA Status	Disclosable
Primary Contact	Dr Sheila Lodge
Date of production	7 May 2021
Action	For Discussion and Decision

1. Recommendations

The Committee is asked to discuss this report.

2. Purpose

At its meeting on 24 February 2021, the Committee asked that an updated workplan for Data Protection be provided to this meeting (ACC3-6.1).

3. Key Insights

3.1 To enable comparison, the Data Protection Workplan for January – March 2021 appears below, followed by the updated plan for April – June 2021.

3.2

City of Glasgow College – Data Protection Work Plan

(5th January 2021 to 31st March 2021)

No.	Action	Details	Date for Delivery
1	Registration with ICO	Registration of Thorntons appointment with ICO was submitted to ICO in December 2020.	Dependent on ICO. Thorntons to monitor and follow up.
2	Training and Awareness	(i) Confirm training and awareness with SL. (ii) Arrange Comms with OD (iii) Delivery of Training	(i) Jan 2021 (ii) Jan/Feb 2021 (iii) March 2021
3	Review and update of ROPA	City of Glasgow's former DPO created c40 ROPA's for the College. These records need to be reviewed and updated and expanded to align with ICO's new ROPA template	28 th Feb 2021
4	Website Audit	Remove out of date references on website – to DPA 1998 and ensure DPO is signposted clearly. Identify areas of the website which may need to be updated to reflect UK exit from EU.	5 th Feb 2021
6	Brexit preparation	Raise awareness of importance of preparatory steps to be carried out to map EU to UK data flows	29 th January 2021 (with ongoing review and support)
5	Privacy notices and statements.	Review all internal and external facing data protection documentation and identify any gaps or areas where update/improvement required.	22 nd January 2021

7	Departmental Compliance Health Checks	Issue electronic data protection questionnaires to stakeholders across City of Glasgow College to capture data processing activities	12 th February 2021
8	Commence Gap Analysis	Gap analysis to commence in January 2021 to review City of Glasgow College Controls against the requirements of the GDPR and the ICO's accountability framework	March 2021 for delivery of gap analysis report to SL

3.3

City of Glasgow College – Data Protection Work Plan (1 April to 30 June 2021)

No.	Action	Details	Date for Delivery
1	Registration with ICO	Registration of Thorntons appointment with ICO was submitted to ICO in December 2020.	Registration complete
2	Training and Awareness	Mandatory data protection training to be rolled out across College. Training with ELT April 22 nd 2021 Bespoke sessions for procurement and marketing May 2021. Meeting with Associate Deans: comms to be issued by Learning Team and timetable agreed.	Rolling programme until 31 July 2021
3	Review and update of ROPAs	City of Glasgow's former DPO created c40 ROPAs for the College. These records need to be reviewed and updated and	ROPAs ready to be shared with departments for validation as at 31 March 2021.

	(Records of Processing activity)	expanded to align with ICO's new ROPA template.	
4 (New)	DPO to work with College Teams validate ROPAs.	DPO has reviewed records of processing (ROPAs) and made necessary updates to improve compliance with Art. 30 of the GDPR. The DPO seeks validation of these records and will collaborate with College teams to finalise these.	30 June 2021
4	Website Audit	Remove out of date references to DPA (1998) on website and ensure DPO is signposted clearly. Identify areas of the website which may need to be updated to reflect UK exit from EU.	5 February 2021
6	Brexit preparation	Raise awareness of importance of preparatory steps to be carried out to map EU to UK data flows.	On hold while awaiting adequacy decision from EU.
5	Privacy notices and statements	Review all internal and external facing data protection documentation and identify any gaps or areas where update/improvement required. Returned to amber because Student and Staff privacy notices require additional updates to reflect new processing activities (March 2021)	31 May 2021 for new updates.

		Internal facing documentation flagged for review includes: <ul style="list-style-type: none"> • Data breach process • Retention policy • DP Policy • Request for personal data procedure 	
7	Departmental Compliance Health Checks	Issue electronic data protection questionnaires to stakeholders across City of Glasgow College to capture data processing activities	Ongoing programme of checks until 30 September 2021.
8	Commence Gap Analysis	Gap analysis to commence in January 2021 to review City of Glasgow College Controls against the requirements of the GDPR and the ICO's accountability framework	Delivered April 2021
9 (New)	Compliance Action Plan	Further to output of gap analysis, DPO to define plan to address areas where improvement is required.	15 May 2021

4. Impact and Implications

4.1 The DPO is making good progress towards assuring compliance with the relevant data protection legislation, so safeguarding the College's position and reputation.