

**NORTH YORKSHIRE FIRE AND RESCUE SERVICE
DATA PROTECTION COMPLIANCE REVIEW - AGREED ACTION PLAN**

Report Area	DPO Recommendation	NYFRS Comment	Target Completion Date	Progress Update
Governance	Data Subject Rights Request Procedure to be updated to include the specific process for internal review and to include detail as to the right to raise any matter with the DPO	CAO Manager to update the procedure	31/03/2020	Work in progress
Governance	Information Security and Handling Policy is still in draft form so needs completing and signed off.	CAO Manager to update the procedure	31/03/2020	Document reviewed and amendments made. Awaiting sign off by SIRO
Governance	The ICT User Policy refers to the Data Protection Act 1998 and contains a section about staff members bringing their own devices to work. It is recommended that this paragraph is reconsidered as in it's current format it raises security concerns	CAO Manager to work with Head of IT to update the policy	06/03/2020	All changes made to update legislation. Meeting scheduled with Head of ITSS on 27.02.2020 to review the policy and make any necessary amendments.
Information Asset Register	More information required in the Information Asset Register to ensure compliance with the specific requirements in relation to the organisation's processing activities. Info to be included is: Purpose of processing, whose personal data does it contain, Types of personal data (including whether there is any special category information, Retention period, GDPR Article 6 and 9 basis for sharing, Who is the information shared with (controller and processor), names of third countries or international organisations data is transferred to and safeguards for exceptional transfers of personal data to third countries etc if applicable, General description of organisational and technical security measures.	CAO Manager to review and update as appropriate	31/05/2020	Work in progress. CAO Manager met with NYCC Data Governance Manager on 21.02.20 who will be assisting with this piece of work. This information is all held by the Service in various spreadsheets and Sharepoint lists however work will commence to amalgamate and update into one document as per Veritau's recommendation.
Information Asset Register	Data Processors - review of all data processing contracts required to identify any gaps where further contracts may be required	CAO Manager to review all current contracts and identify any gaps	31/05/2020	Work will be done as part of the Information Asset Register work.
Governance	Amend Safe and Well Privacy notice to include precise information about when consent will be relied upon	CAO Manager to amend policy	30/04/2020	Not yet started.
Governance	Consider the wording used in privacy notices to see, where possible, it can be simplified for easier reading.	CAO Manager to review all Privacy notice	30/06/2020	Not yet started. NYFRS have all relevant Privacy notices. Veritau have suggested these privacy notices could be more concise. However, they do contain all required information so will be reviewed once the priority tasks are completed.
Governance	Complete review of Youth Engagement Privacy notice to ensure it is published on the website.	CAO Manager to review Privacy Notice	28/02/2020	Review completed and will be published by 28/02/2020
Governance	Update policies to ensure the role of the Data Protection Officer is sufficiently clear as some of the references in the policies to the responsibilities of the DPO are not always correct.	CAO Manager to review policies	31/03/2020	In progress
Retention & Destruction	Need to re-introduce destruction log which includes details of the officer responsible for deletion / destruction of the data and when it was carried out	CAO Manager to ensure destruction log is updated	28/02/2020	Completed
Information Security	Continue to work on implementing the necessary systems to ensure back up checks are able to occur in a manner which allows for full reassurance that a restore would be possible in the event of an emergency	CAO Manager and Head of ITSS to review all systems	31/03/2020	Completed - the move of key systems to Azure has provided a greater element of security and ability to restore data in the event of an emergency.
CCTV, Biometrics and RIPA	Commence work in relation to surveillance and make sure there are suitable arrangements in place including but not limited to privacy notices and policy documents. CCTV has been considered but other aspects of surveillance need further consideration	CAO Manager and Estates Manager to complete review of Surveillance systems	30/04/2020	In progress
CCTV, Biometrics and RIPA	RIPA policy review needs completing	CAO Manager to review and complete	08/08/2020	Complete. Review has taken place. Decision made to not continue with this area of work due to Government decision to take away RIPA powers from Fire and Rescue Services.
Training	Data protection to be included within full training plan for the organisation to ensure there is a plan for continued training	CAO Manager to review	28/02/2020	Complete. Data Protection is mandatory for all new starters as part of the induction process and online training is mandatory every 2 years thereafter.