

CLWYD PENSION FUND – GDPR TIMELINE

W/C	Description	Action	Completed
	Assign roles and responsibilities	✓	Nov 2017
	Appointment of data protection officer (ICO 11) – Internal FCC	✓	Internal (FCC)
01/01/18	Basic overview training to be provided to individuals involved (ICO 1)	✓	01/01/18
29/01/18	Review policies, procedures, privacy notices, communications (ICO 5)	✓ Procedures confirmed to be managed by FCC. Template Privacy Notices received	13/03/18
12/02/18	Gather information asset register for FCC (ICO 2)	✓ All assessed and verified by Governance Team at FCC	18/05/18
19/02/18	Ensure that decision-making in relation to the balance between the interests of the controller (or relevant third party) and the rights of data subjects is documented (legitimate interests) (ICO 6)		
19/02/18	'Right to Erasure' and 'Right to Restriction of Processing' testing (ICO 4)	✓ Forwarded to Deb Sainsbury	28/02/18
29/01/18	Website update	✓ Webpages launched on website	13/04/18
26/02/18	Pinpoint all contracts held with third parties who process data on the Funds behalf or joint controllers.	✓	26/02/18
05/03/18	Notification that contracts will be required to be amended (SLA's for employers plus external bodies)	✓ SLA's not amended, external parties contacted (Prudential, Aquila Heywood)	05/03/18
05/03/18	Confirm cyber security methods undertaken by AquilaHeywood (confirmed by end of February) – ICT too (shared drives).	✓	27/03/18
12/03/18	Identify anywhere the Fund uses member consent to ensure all forms are up to date. (ICO 7)	✓ Consent button in MSS TEST has been updated within Altair 8.1, to be inserted in LIVE from May 25 th 2018	20/03/18
12/03/18	Creating processes whereby members can retract any consent provided previously (withdrawal), and how CPF deal with requests	✓ All processes are initially forwarded to FCC data protection team	18/05/18
12/03/18	Children's online data review, which national rules you will need to follow when obtaining consent (ICO 8)	✓ MSS keys sent to all status 6 children. Under 16's requiring parent/guardian consent prior to key/link being distributed	29/03/18
19/03/18	Insurance policies should be confirmed internally along with risk registers to assess the extent of breach coverage (FCC insurance section to incorporate CPF) Breaches procedures to be set. (ICO 9)	✓ Confirmed	19/03/18
19/03/18	Privacy notice to be updated, and inserted to all relevant means of communications (overview of letters/website) (ICO 3)	✓ GDPR paragraph inserted in all member correspondence	18/04/18
26/03/18	Data protection policy (FCC reviewing), possible amendments ensuring that it covers data retention, destruction, security and anonymisation	✓ West Midlands have forwarded reviewed policy which can be used for LGPS funds – confirmed FCC will cover processes	19/04/18
02/04/18	Revised agreements with third parties (e.g. employers)	✓ Received addendums from Prudential, Equiniti, Adare, Aquilaheywood, signed and returned.	18/04/18
09/04/18	Review security of data including details on cyber security to ensure data is safe (emails/egress/portal).	✓ Addendum signed for Aquila Heywood and returned	09/04/18
30/04/18	Overview of all set procedures above comply with those of GDPR	✓ Procedures confirmed by FCC governance	30/04/18
30/04/18	Assemble a further review of the GDPR processes, data protection policy and all documentation	✓ Privacy Notice submitted	25/05/18
07/05/18	In-house training to team including ICO code of practice information (ICO 10)	✓ Staff have completed in-house training	20/03/18