

## GDPR Annual Report

**Submission Date: 16<sup>th</sup> November 2021**

**Submitted By: Natasha Johnstone**

**Submitted To: CEO, Board of Trustees**

---

1. Purpose of the Report: To update on GDPR compliance progress within the 2020/21 operational year.
2. About the Reporting Requirement: Organisations are required to report annually on GDPR compliance in accordance with the new Data Protection Act 2018.
3. Responsible Person(s): Natasha Johnstone, Data Protection Officer.
4. Reporting Period: 1<sup>st</sup> April 2020 – 31<sup>st</sup> March 2021.

5. Reporting / Notification

Reporting

Subject Access Requests – One  
Requests for the Erase of Data – None  
Data Breaches – Four

Notification

Two notifications to ICO were required during the year. As part of organisational performance reporting, notifications are reported to the Board on a quarterly basis.

6. Summary of Policies/Procedures in Place:

In October 2018, the organisation hired a graduate intern to take forward a two-year organisation wide GDPR project. Due to staff shortages, some actions were carried forward into a third year.

A project scope document was created with three main objectives: Training, Review and Implementation.

The project had the following planned outcomes:

Year One	Year Two	Year Three
Train Board of Trustees	Implement GDPR Compliant Framework for each service: Privacy Notice, Consent Forms, Form of authority, article 30 documentation, legitimate interest assessments.	Train any staff members who have not had GDPR training.
Train All Staff	Data Protection Templates	Create a training timetable to ensure staff received refresher training after 2 years.
Data Mapping	Data storage and retention schedule	Complete the Implementation of GDPR Compliant Framework for Admin department
Desktop Audit with all client facing staff	Update Client Guide	Destroy data which does not comply with the data and storage retention schedule.
Review of Partner Contracts	Update Partner agreements.	Upload of Privacy notice on FLF website
	Training off all new staff during induction.	Implement GDPR complaint recruitment / personal paperwork.
	Reduction of client data stored on Sharepoint	Update of Internet Policy
	Creation and Implementation of GDPR fundraising paperwork	Carry out an annual audit.
	Creation and Implementation of GDPR fundraising paperwork	

#### 7. Actions Taken within the Year:

- Training took place for new staff (Feb 2021)
- A training timetable has been created.
- GDPR Compliant Framework has been implemented for the admin department (this includes personal & recruitment paperwork)
- Electronic & paper data (held in our lockup) was destroyed in line with retention schedule.
- Privacy notices were reviewed and uploaded to our website.

Staff shortages and Covid 19 has impacted on our ability to complete all the year three outcomes. These will be implemented in Year 4 as follows:

<b>Year Four</b>
Creation of Internet Policy
Carry out an annual audit.

8. Recommendations/Concluding Statements:

- It is recommended that the year four outcomes are completed before 31<sup>st</sup> March 2022.
- It is recommended that the administration of GDPR is reviewed to make it proportionate to the resources within the organisation.
- It is recommended that staff continue to receive training during their first year of employment and be retrained every 2 years.
- An annual audit of one service should be carried out to ensure practice remains robust.