

Annual Reporting Template

Submission Date: 1st November 2019

Submitted By: Natasha Johnstone

Submitted To: CEO, Board of Trustees

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1. Purpose of the Report: To update on GDPR compliance progress within the 2018/19 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: 1st April 2018 – 31st March 2019.

5. Reporting / Notification

Reporting

Subject Access Requests – None

Requests for the Erase of Data – None

Date Breeches – None

Notification

No 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.

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
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 All Staff	Data Protection Templates
Data Mapping	Data storage and retention schedule
Desktop Audit with all client facing staff	Update Client Guide
Review of Partner Contracts	Update Partner agreements.
	Training of all new staff during induction.
	Reduction of client data stored on Sharepoint
	Destroy data which does not comply with the data and storage retention schedule.
	Upload of Privacy notice on FLF website
	Implement GDPR complaint recruitment / personal paperwork.
	Creation and Implementation of GDPR fundraising paperwork.
	Creation of GDPR / Internet Policy
	Carry out a Data Protection day (Data Review)

7. Actions Taken within the Year:

- The Board of Trustees & Management team received training.
- The majority of the staff team received training (with the exception of housing advice).
- Data mapping was carried out within all services except Private Landlord Advice & employability services.
- The lawful basis for each category of data processing has been identified.
- Desktop audits were carried out with all client facing staff
- Partner contracts were reviewed.

8. Recommendations/Concluding Statements:

- It is recommended that the year two outcomes are completed before 31st March 2020.
- It is recommended that the GDPR is embedded into mainstream work due to a lack of resources within the organisation.
- All staff should receive refresher training after 2 years.
- An annual audit should be carried out to ensure practice remains robust.