

GDPR Annual Report 2019/20

Submission Date: 1st September 2020

Submitted By: Natasha Johnstone

Submitted To: CEO, Board of Trustees

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1. Purpose of the Report: To update the Board on Frontline Fife's (FLF) GDPR compliance progress within the 2019/20 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 2019 – 31st March 2020.
 5. Reporting and Notification

Reporting

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

Notification

As part of the charity's performance reporting, notifications are reported to the Board on a quarterly basis. This was done accordingly. No notifications to the ICO were required during the year.

6. Summary of Policies/Procedures in Place:

In October 2018, the charity recruited a graduate intern to take forward a two-year organisation wide GDPR project.

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

The project had the following planned outcomes:

Year One (2018/19)	Year Two (2019/20)
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 Audit

7. Actions Taken within the Year:

- Staff Training *: The majority of new staff, having joined the charity, received training. The Housing Advice team also received training. This training will continue to be rolled out as and when required.
- Data mapping * was carried for the Private Landlord Advice & Employability service. Data mapping has now been completed for all FLF services.
- The GDPR Compliant Framework has been implemented for all services except for the admin department.
- Data Protection Templates have been created.
- A Data storage and retention schedule has been created.
- FLF's Client Support guide was updated.
- Partner agreements were updated.
- There has been a reduction of client data on Sharepoint. This will be reviewed annually during the scheduled audit.

- GDPR compliant fundraising paperwork was created.
- A GDPR policy has been created.
- Client Data on Sharepoint has been filed into financial years.
- FLF's recruitment Application Form has been updated to include GDPR compliant statements.
- Paper data was destroyed in accordance with FLF's new data retention schedule.

** Planned Outcome for Year 1 which moved into Year 2 as it wasn't fully completed.*

Year one outcomes are now complete, Staff shortages and Covid 19 has impacted on our ability to complete all year two outcomes. These will be implemented in Year 3 as follows:

Year Three 2020/21
Staff training for those who have not yet received GDPR training.
Training Timetable: Create a training timetable to ensure staff receive refresher training.
Complete the implementation of GDPR Compliant Framework for the Admin department.
Continue to destroy data which does not comply with the data and storage retention schedule.
Upload the new Privacy Notice on FLF's website
Implement GDPR complaint recruitment / personal paperwork.
Develop an Internet Policy as part of the wider safeguarding framework
Carry out an annual audit based on capacity and establish an ongoing audit cycle for FLF services.

8. Recommendations/Concluding Statements:

- It is recommended that year three outcomes are completed before 31st March 2020.
- It is recommended that GDPR policy and practice is embedded into mainstream work activity where possible due to a lack of dedicated resources within the charity and that current proposed practices are reviewed to assure they can be embedded without further resource investment.
- All staff should receive refresher training within a realistic interval cycle.
- An annual audit which can be managed within current resource capacity should be carried out to ensure practice remains robust.

