## **GDPR ACTION PLAN TEMPLATE**

| **Area** | **Task** | **Requirement** | **Template** | **Assigned Owner** | **Start Date**  | **Deadline Date**  | **Date Completed** |
| --- | --- | --- | --- | --- | --- | --- | --- |
| **1. AWARENESS & ACCOUNTABILITY** | 1.1 | Instruct your workforce to direct GDPR related issues directly to you.  | Complete | Amy Gosling | 17.10.2023 |  |  |
| 1.2 | Train your workforce to record data in the right places.  | Trainer? |  |  |  |  |
| 1.3 | Train your workforce on how to communicate with members.  | Trainer? |  |  |  |  |
| 1.4 | Add GDPR training to your induction process and ongoing training programme. | Trainer? |  |  |  |  |
| 1.5 | Assess how your systems and processes look now, and how it needs to look to comply.  | Ongoing | Amy Gosling | 17.10.2023 | 30.11.2023 |  |
| 1.6 | Ensure ongoing review of policies and procedures. | 6 monthly review | Amy Gosling | 17.10.2023 | 17.04.2024 |  |
| **2. INFORMATION YOU HOLD** | 2.1 | Document the types of info you hold in your Information Asset Register.  | **Area 2 Template** |  |  |  |  |
| 2.2 | Document where info comes from and the data flows related to its use within your Information Asset Register. |  |  |  |  |
| 2.3 | Document processing activities relating to special categories of personal data |  |  |  |  |
| 2.4 | Document your Data Retention Policy and ensure retention periods are captured in all privacy policies |  |  |  |  |
| 2.5 | Document who your data is shared with and identify if it is shared outside the EEA.9 |  |  |  |  |
| **3. COMMUNICATING PRIVACY INFO** | 3.1 | Update your Privacy Policy (you may require different versions for employees, volunteers, members (children) and contractors. This should include details of how individuals activate their rights.) | **Area 3 Template A** | Amy Gosling | 17.10.2023 | To be reviewed by committee |  |
| 3.2 | Ensure your Privacy policy is published. |  | Becky Atkins | 17.10.2023 |  |  |
| 3.3 | Update your internal Data Protection Policy and share with workforce so they are aware of what they can and cannot do with personal data. This should include information relating to IT, Security and use of remote devices. | **Area 3 Template C** | Amy Gosling | 17.10.2023 | To be reviewed by committee |  |
| **4. INDIVIDUALS RIGHTS** | 4.1 | Ensure individual’s rights are listed in your Privacy Policy | **Area 3 Template A** | Amy Gosling | 17.10.2023 | To be reviewed by committee |  |
| **5. ACCESS REQUESTS** | 5.1 | Document how you’ll handle people’s requests for copies of their info.  | **Area 5 Template A** | Amy Gosling | 17.10.2023 |  |  |
| 5.2 | Document how you’ll let people amend the info you have on them including consent.  | Amy Gosling |  |  |  |
| 5.3 | Demonstrate how you will delete or ‘forget’ people from your records.  | Amy Gosling |  |  |  |
| 5.4 | Document the file format and time scales these tasks will take. | Amy Gosling |  |  |  |
| 5.5 | Create Data request log | **Area 5 Template B** | Amy Gosling |  |  |  |
| **6. PROCESSING DATA** | 6.1 | Document why you need to lawfully process people’s data (Organisations with more than 250 employees will need to maintain a Register of Lawful Basis and Data Processing Activities)  | **Area 3 Template A** | Amy Gosling |  |  |  |
| 6.2 | Document how you will ask people for permission to use their details.  | Amy Gosling |  |  |  |
| 6.3 | Identify how you are going to treat any historic data you hold |  | Amy Gosling |  |  |  |
| 6.4 | Conduct and document physical security reviews of both IT and physical systems/records and their compatibility with GDPR |  |  |  |  |  |
| 6.5 | Ensure your asset register is accurate and up to date (if applicable) | **Area 6 Template** |  |  |  |  |
| 6.6 | Ensure you have additional security measures in place if processing special categories of data. |  |  |  |  |  |
| 6.7 | Ensure you have the necessary protections in place if data is being processed outside the EEA e.g. privacy shield etc. |  |  |  |  |  |
| 6.8 | Document your procedure for ensuring personal data is accurate and up to date |  |  |  |  |  |
| 6.9 | Ensure robust and frequent backups are in place for any IT systems and are retained for a sufficient period of time. |  |  |  |  |  |
| 6.10 | Ensure any 3rd party processors have appropriate data security measures in place and you have data processing agreements in place with them. |  |  |  |  |  |
| 6.11 | If you act as a 3rd party processor for another organisation (e.g. a club for a league) ensure you put a data sharing agreement in place. |  |  |  |  |  |
| 6.12 | Ensure you have the appropriate processes in place for destroying data when it is no longer required e.g. IT asset destruction, confidential waste destruction. |  |  |  |  |  |
| **7. CONSENT** | 7.1 | Update Forms and data collection processes to ensure explicit consent is obtained where required | **Area 3 Template B** | Amy Gosling | 17.10.2023 | To be reviewed by committee |  |
| 7.2 | Document how you will let people withdraw consent and document how easy this will be. | **Area 3 Templates A&B** |  |  |  |  |
| **8. CHILDREN** | 8.1 | Document how you gain consent from parents / guardians of children.  | **Area 3 Templates A&B** |  |  |  |  |
| 8.2 | Check your organisation management system / processes comply with [NSPCC CPSU](https://www.coacha.co.uk/LinkClick.aspx?fileticket=fJ9HZXGo0Is%3d&portalid=1) best practice guidelines for text / email broadcasts. |  |  |  |  |  |
| **9. DATA BREACHES** | 9.1 | Document how you will deal with any potential data breaches. | **Area 9 Template** |  |  |  |  |
| **10. DATA PROTECTION BY DESIGN** | 10.1 | Complete a Data Protection Impact Assessment (DPIA) as required.  | **Area 10 Template** |  |  |  |  |
| 10.2 | If a DPIA is not required document the reasons for this decision. (Use Form 1 from the DPIA Tool) | **Area 10 Template** |  |  |  |  |
| **11. DATA PROTECTION OFFICERS** | 11.1 | Decide if you need to appoint a DPO and record outcome and basis for decision.  |  |  |  |  |  |
| 11.2 | If a DPO is not required set up a GDPR working group |  |  |  |  |  |
| 11.3 | Update job or role descriptions for those which have any addition Data Protection responsibilities |  |  |  |  |  |
| **12. INTERNATIONAL TRANSFERS OF DATA** | 12.1 | If applicable, determine your lead data protection supervisory authority and document it. |  |  |  |  |  |