

ANNEX A

Summary ICO audit action plan

Training		Implementation date
1	Assign Information Management Group responsibility for monitoring training provision and ensure adequate monitoring arrangements are in place.	By January 2016
2	Review the Training Strategy and develop a needs based training matrix	By December 2015
Policy		
3	Review the Information Managements and Data Quality Policy and amend as necessary	By March 2016
4	Produce and adopt a Subject Access Request Policy and ensure it is well communicated to staff.	By January 2016
5	Update Data Protection Policy to reflect Subject Access Request procedure and Data Sharing requirements	By March 2016
6	Finalise the Information Asset Register and Retention Schedule	By January 2016
7	Agree Key Performance Indicators for response times to Subject Access requests and formalise a monitoring process	By January 2016
8	Produce and agree a Data Sharing process and ensure it is well communicated to staff	By March 2016
9	Review all existing Data Sharing agreements to ensure compliance with Policy including within the MASH	By March 2016
10	Update the Privacy notice on the Council's website to clarify when the Council may share information with third parties	By November 2015
11	Develop a process for undertaking Privacy Impact Assessments.	By January 2015
12	Develop a process for responding to information requests outside formal data sharing arrangements	By January 2016