

Nottinghamshire Pension Administration GDPR Action Plan		
Action	By whom	By When
1. Administration Strategy and Communications		
1.1 Administration Strategy		
Review and Update to include details of GDPR, explanation of Data Controller and Data Processor roles and responsibilities, data breach and subject access process	Pension Manager	End of April 2018
Report updated Administration Strategy to Pensions Committee – 7 June 2018	As above	June 2018
Communicate revised Administration Strategy to all Scheme Employer	Employer Support & Compliance Team	June 2018
1.2 Communication to LGPS Members		
LGPC GDPR Question and Answer leaflet – seeking approval from Pensions Committee 19 April 2018	Employer Support & Compliance Team	End of April 2018
<ul style="list-style-type: none"> • Hardcopy to be sent to Pensioners with April payslip • Digital copy to be published on Nottinghamshire Pension Fund website and circulated to Scheme Employers 		
2. Training		
2.1 General GDPR training to be rolled out from w/c 9 April 2018 to be completed by 11 May	NCC IG Programme	11 May 2018
2.2 Investigate if any “pension” specific GDPR training is being offered by LGPC/EMPOG	Pension Manager	May 2018
3. Review Data Security Measure and assess Adequacy		
3.1 Develop a compliance plan to ensure appropriate technical and organisational data security measures are in place both at the Authority and with any third party service provider	Group Manager BSC & Pension Manager	May 2018
3.2 Review existing applications and process that involve the use of personal data and ensure that they are secure	Pensions Office	May 2018

3.3 Implement a policy to ensure that data is only stored for the minimum period necessary Awaiting confirmation on LPGS retention policy	Pension Manager	May 2018
3.4 Consider whether data encryption should be used, especially for sensitive personal data such as health data All transfers of members data between Scheme Employers and Administration Authority is via a secure portal. Member data sent via email is password protected.	Pensions Office	May 2018
3.5 Default settings (for example, on members portals) must be configured to automatically provide data security Nottinghamshire Pension Fund does not currently have a live Scheme Employer or Member Portal Scheme Employer portal is development, Data Protection Impact Assessment completed. Security and penetration testing planned	Pension Manager	On going
4. Update Service Provider contracts		
4.1 Work with current service providers and any other third party that received data from the LGPS fund. E.g. actuaries/auditors, to amend the contractual provisions as necessary to comply with the GDPR. NCC Procurement have adopted the Crown Commercial Services GDPR Policy Procurement	Group Manager BSC/NCC Procurement	End of May 2018
4.2 Do not agree to any revised contract without first obtaining proper advice that it does not impose additional obligations on the authority/the fund All future contract changes to be managed by NCC Procurement Centre		
4.3 Ensure that the contractual terms applying to all new appointments are compliant with the GDPR As above		
4.4 Ensure that any third party administrator maintains adequate records Not applicable to Nottinghamshire Pension Fund		
5. Revise and update privacy notices and consider whether member consent is required		
5.1 Review and resend all member privacy notices in order to comply with the GDPR	Group Manager	May 2018

LGPC secretariat have commissioned a third party provider to produce two template privacy notes for LGPS Administering Authorities to be tailored to needs of individual Funds. NCC Legal Services reviewing templates. Once review complete privacy notices will be updated accordingly. 5.2 Review consents the authority relies on to justify the processing of personal data	BSC/NCC Legal Services NCC IG Programme	May 2018
5.3 Consider new or revised consent to data processing by the Fund. New joiner information may need to be updated	Pension Manager/LPGC	May 2018
5.4 Clear records of all privacy notices and consents must be kept	Pension Manager	May 2018
6. DPO and establish a breach management process and subject access requests		
6.1 Establish an effective data breach response plan that ensures any breach is addressed and assessed for the obligation to notify and that the relevant ICO report and any member notifications can be made in a timely fashion Consideration to be given to adopting the Nottinghamshire County Council corporate process	Group Manager BSC/Service Director Customers & HR	May 2018
6.2 Establish an effect subject access request process Consideration to be given to adopting the Nottinghamshire County Council corporate process	Group Manager BSC/Service Director Customers & HR	May 2018
6.3 Appoint a suitably qualified DPO, if you organisation is required to have one. This could be the Authority's appointed general DPO, if there is one, provided that person meets the criteria. Consideration to be given to using the Nottinghamshire county Council DPO	Group Manager BSC/Service Director Customers & HR	May 2018
6.4 Where Administering Authorities share pensions services, one DPO could be appointed to more than one authority in respect of their LGPs funds Not applicable to the Nottinghamshire Pension Fund		

7. Ensure processes are in place to cater for the new individual rights		
7.1 Identify which of the new rights may be exercised by members Awaiting guidance from LGPC	LPGC/Pension Manager	May 2018
7.2 Establish procedures to ensure that the new rights can be exercised Awaiting guidance from LGPC	LPGC/Pension Manager	May 2018
8. Carry out Data Protection Impact Assessment (DPIA)		
8.1 Assess whether any use of personal data would be classified as "high risk" under the GDPR and if so, carry out a DPIA		
8.2 Complete a DPIA for Civica Universal Pension Manager – pension administration system	Pension Manager	May 2018