

Tasks of the Data Protection Officer:

Task No.	Details of the task	What is involved	Delivery of the task	Timeframe
Task 1 - Short Term Objective	Strategically develop and improve the Councils data protection compliance ensuring the Council develops a robust and effective plan for the implementation of the General Data Protection Regulations.	<p>Effectively develop and create a data protection plan that will implement all relevant articles contained within the regulations and data protection legislation.</p> <p>To establish robust policies and procedures and formalise internal working strategies across all departments that will ensure compliance, and to enforce those policies where appropriate in order to ensure the council is able to demonstrate compliance.</p> <p>Work alongside all departments and effectively liaising with senior managers, ensuring they are aware of the obligations placed on the council and have sufficient knowledge of their respective departmental processing activities.</p> <p>Keep up to date with all supervisory authority codes of conduct, tribunal and court rulings in order to continually improve the councils data protection plan and keep all policies and procedures under review thus ensuring the working strategies are followed and the most up to date legislative processes are being followed.</p> <p>This will initially involve considerable time to be spent establishing current procedures within departments, whether there are any internal documents currently in situ and whether those documents are accurate. A review will need to be carried out which will provide significant insight into the current internal working processes of each department using personal information. Once this has been established all departments will, following the instructions of the DPO, follow the new working strategies, policies and procedures implemented. Once this has been set up the DPO will be required to continually review the practices in order to ensure compliance, where appropriate reports will need to be written and new policies/procedures created or updated to reflect the current legal arrangements imposed on the council.</p>	<p>Initial review - contacting relevant departments, attending meetings, seeking documented evidence (where available) of processing activities, establishing what data is held, the purposes for holding the information, the retention periods etc.</p> <p>Creating the policies - there are a number of policies that will need to be implemented/updated: Breach management procedure Data protection policy Retention policies Records management policies Individual departmental policies Strategies and plans that will ensure compliance The overall DP plan that will outline each area of change and how it will be achieved across the council.</p> <p>This is a significant task that will require research, and careful consideration of the requirements of internal departments and the legal requirements that must be adhered to.</p> <p>Carry out reviews of the current working practices and regularly update policies and procedures</p>	<p>Each department would take approximately 2-5 days.</p> <p>Several weeks/months</p> <p>Annually (per policy/procedure/department)</p>
Task 2 - Long Term Objective	To work with and support directorates across the Council ensuring compliance with the data protection legislation.	<p>To provide expert legal advice relating to data protection whilst assisting and responding to all departmental enquiries relating to data protection issues.</p> <p>To act as the Councils main point of contact for all data protection matters, communicating effectively with all departments in order to ensure employees are aware of the obligations imposed by the legislation.</p> <p>Where possible establish effective remedies for all failings in data protection ensuring the Council is able to rectify all issues without delay.</p>	<p>Attend meetings</p> <p>Draft legal advice</p> <p>Respond to telephone enquiries, followed up by emails and other forms of written communication in order to demonstrate compliance.</p> <p>Respond to all written requests for advice</p> <p>Provide departments with recommendations on how to improve practices.</p> <p>Assist departments with the implementation of the recommendations.</p>	<p>Daily</p> <p>Daily</p> <p>Daily</p> <p>Daily</p> <p>Weekly</p> <p>As and when required</p>
Task 3 - Long Term Objective	To inform and advise the Council and its employees who carry out processing of their obligations pursuant to the data protection legislation.	<p>To provide expert advice to all employees that are processing personal information of the legislative requirements.</p> <p>Ensure that all processing activities of the Council are legal and that the necessary conditions are satisfied and legal frameworks are adhered too.</p> <p>The DPO will be required to interpret and apply the legal frameworks detailed within a number of separate legislative provisions in order to ensure that the provisions of the data protection legislation are complied with. Each department will be processing personal information for specific purposes which must be proven to be lawful. The DPO will be responsible for ensuring that all personal information is processed fairly and lawfully.</p> <p>Departments must ensure that they notify the DPO of any additional reasons for processing personal information so that the Council may continue to demonstrate compliance with the legislation.</p> <p>Where necessary establish additional safeguards by drafting and formulating appropriate legal agreements as per task 11.</p>	<p>Attend meetings</p> <p>Draft legal advice</p> <p>Respond to telephone enquiries, followed up by emails and other forms of written communication in order to demonstrate compliance.</p> <p>Respond to all written requests for advice</p> <p>Provide departments with recommendations on how to improve practices.</p> <p>ensure that the processing obligations of the council are compliant with a number of different legislative frameworks.</p> <p>Where the processing activities involve sharing information, processing information or disclosing information to third parties or other internal departments the DPO will ensure these additional activities are compliant with the data protection regime.</p>	<p>Daily</p> <p>Daily</p> <p>Daily</p> <p>Daily</p> <p>Weekly</p> <p>Weekly</p> <p>Weekly</p>

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Task 4 - Long Term Objective	To line manage the Information Governance Officer.	<p>To monitor the IGO performance, carry out reviews of their work and where appropriate implement adequate processes in order to ensure they meet their targets and are able to perform their duties.</p> <p>Assist the IGO with any queries they have regarding their caseload and identify resolutions that will benefit them in the future.</p> <p>Resolve all issues faced by the IGO relating to their workload, training needs etc.</p> <p>To initially provide adequate training in order for them to carry out their role effectively.</p> <p>Supervise the IGO in order to ensure they are able to satisfy the tasks of the job.</p> <p>Approve Flexi, Annual Leave, Travel Expenses etc.</p> <p>Perform one to ones etc.</p>		Daily
Task 5 - Long Term Objective	To put in place formal data protection standards - based on the supervisory authority standards and legal frameworks.	<p>In addition to creating formal policies and procedures the DPO will also be responsible for implementing the codes of conduct issued by the supervisory authority and ensuring that the Council follows these codes in addition to complying with the legislation.</p> <p>These codes of conduct will be used as a foundation for the data protection standards and will be enforced by the DPO.</p>	<p>Keep up to date with all supervisory activities</p> <p>Ensure that all formal codes of conduct are thoroughly researched and implemented across the Council where appropriate</p> <p>Ensure that the Councils data protection standards are reflective of these codes and ensure that compliance is maintained.</p>	<p>As and when new codes of conduct and practice recommendations are produced by the Supervisory Authority.</p> <p>The complexity of the code will determine the length of time it takes the DPO to implement the recommendations across the Council</p> <p>Approx. 1-2 months.</p>
Task 6	Effectively manage and administer and act as the budget holder for the Information Governance Financial Budget.	<p>As a budget holder the DPO must ensure that expenditure is incurred in accordance with the Financial Regulations, this includes ensuring, where appropriate, that goods and services are procured in line with the Councils procurement policy.</p> <p>The DPO must not make commitments which will result in an overspend against the budget, unless prior approval has been given. The reasons for any overspend should be documented and reported to the Head of Service and where possible steps should be identified to make savings to bring the spend back within budget.</p> <p>The DPO must liaise with the Councils Finance Department in order to ensure that all transactions are coded correctly. This ensures that the financial system reports spend against the most appropriate area and spend is matched to budget.</p> <p>The DPO will be expected to use resources economically, efficiently and effectively so that maximum benefit can be gained from the funds and that the funds are used for the purposes given.</p> <p>The DPO will be required to keep adequate records of all purchases</p> <p>The DPO must monitor and control spend within the Information Governance Budget, where coding errors are identified these should be notified to the Finance Department for correction.</p>		Daily - as and when purchases are made.
Task 7	To monitor compliance with the data protection provisions, with other countries data protection provisions and with the policies of Council in relation to the protection of personal data, including the assignment of responsibilities, playing a critical role in decisions made relating to data protection.	<p>The DPO must be consulted on all matters that concern the use of personal information.</p> <p>If a department is to receive or provide services to another country which involves the exchange of personal information it will be the responsibility of the DPO to ensure that the processing activities are lawful.</p> <p>The DPO will have the overall responsibility for ensuring the Council complies with both countries data protection requirements.</p> <p>Ensure that the Councils suppliers are not contracting their services to an international company, if there are such instances the DPO will be responsible for ensuring that the Councils contractors also have adequate arrangements in place with the third party suppliers.</p>	<p>Where appropriate research the data protection laws within the trading countries jurisdiction.</p> <p>Inform departments of these additional responsibilities by drafting sound legal advice which will outline exactly what the department is required to do in order to comply with both countries data protection legislation.</p> <p>Where appropriate draft appropriate data protection clauses into the service contracts of if required draft a stand alone agreement which outlines the appropriate legal clauses which enable to lawfulness of the processing.</p> <p>Approve all international transfers of personal data.</p>	<p>1 - 5 days</p> <p>1 day</p> <p>1 day</p> <p>1 day</p> <p>The DPO must carry out this function as and when required</p>

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Task 8	Awareness-raising and training of staff involved in processing operations	<p>The DPO will be required to arrange appropriate training for relevant members of staff so that they are aware of the new regulations and how these changes will influence their processing activities.</p> <p>Where appropriate the DPO will be responsible for asking external data protection experts to provide additional training and to raise awareness of the changes and to reinforce the obligations faced with the legislative changes.</p>	<p>Setup training events for key members of staff to attend.</p> <p>Produce training materials for staff to follow and use.</p> <p>Promote these changes via email etc. in order to raise awareness across all service areas.</p> <p>Contact external data protection experts, such as officers of the supervisory authority, to attend these training events.</p>	<p>1 week</p> <p>1 week</p> <p>Daily</p> <p>As and when required</p>
Task 9	To take the lead in providing expert data protection advice to Members, Chief Officers, Council officers and external clients relating to all aspects of data protection.	<p>To provide expert legal advice relating to data protection whilst assisting and responding to all departmental enquiries relating to data protection issues.</p> <p>To act as the Councils main point of contact for all data protection matters, communicating effectively with all departments in order to ensure employees are aware of the obligations imposed by the legislation.</p> <p>Where possible establish effective remedies for all failings in data protection ensuring the Council is able to rectify all issues without delay.</p> <p>If possible provide expert legal advice relating to data protection to external organisations such as Schools, the Leisure Trust etc. SLA's must be set up prior to this advice being provided as these organisations will be responsible for appointing their own data protection officer.</p>	<p>Attend meetings</p> <p>Draft legal advice</p> <p>Respond to telephone enquiries, followed up by emails and other forms of written communication in order to demonstrate compliance.</p> <p>Respond to all written requests for advice</p> <p>Provide departments with recommendations on how to improve practices.</p> <p>Assist departments with the implementation of the recommendations.</p> <p>set up a SLA between the external organisations</p> <p>Once these SLA's have been finalised respond to all issues received by the external organisations.</p>	<p>Daily</p> <p>Daily</p> <p>Daily</p> <p>Daily</p> <p>Weekly</p> <p>As and when required</p> <p>1 Week - reviewed in accordance with the SLA timeframes.</p> <p>Daily</p>
Task 10	Develop and implement a comprehensive data protection plan and provide advice in this area.	<p>The plan will outline how the DPO will ensure compliance with the data protection legislation and demonstrate how the risks of failure to comply will be minimised.</p> <p>This plan will outline how changes to the legislation will be implemented and the steps that will be required by the Council in order to ensure compliance.</p> <p>The DPO will maintain responsibility for updating this plan and ensure the Council is engaging with the identified issues contained within it.</p>		Weekly
Task 11	To draft complex legal agreements relating to the processing of personal information for use with external organisations in order to ensure data protection compliance, this will include but not limited to data disclosure agreements, data processing agreements, data transfer agreements memorandum of understandings and confidentiality agreements. This will also include the drafting of interdepartmental agreements.	<p>Take the lead in ensuring that all data processing activities are formulated within specific legal agreements.</p> <p>The DPO will draft all of the relevant clauses required to ensure that the processing is legal. Taking into consideration the relevant contracting clauses and legislative provisions.</p>		Weekly
Task 12	To provide expert advice where requested regarding data protection impact	<p>Data protection impact assessments are a tool which can help the Council identify the most effective way to comply with the data protection obligations and meet individuals' expectations of privacy. An effective DPIA will allow the Council to identify and fix problems at an early stage, reducing the associated costs and damage to reputation which might otherwise occur.</p> <p>The DPO will act as the Councils lead contact when a department is required to implement a DPIA. A DPIA will be required in the following circumstances:</p> <ul style="list-style-type: none"> •using new technologies; and •the processing is likely to result in a high risk to the rights and freedoms of individuals. •systematic and extensive processing activities, including profiling and where decisions that have legal effects – or similarly significant effects – on individuals. •large scale processing of special categories of data or personal data relation to 	<p>Setup a standard DPIA template that must be completed by individual departments.</p> <p>Draft guidance to be issues alongside the DPIA</p> <p>Ensure that this template is deemed to be acceptable by the Deputy Chief Executive.</p> <p>The DPO will be required to provide advice to departments in order to create an effective DPIA:</p> <ul style="list-style-type: none"> •attending meetings •consulting with relevant departments •providing advice and assistance <p>The DPO will provide advice and assistance to departments with the following:</p> <ul style="list-style-type: none"> •A description of the processing operations and the purposes, including, where applicable, the legitimate interests pursued by the controller. 	<p>1 week</p> <p>1 week</p> <p>1 week</p> <p>Several days a month</p> <p>Weekly</p>

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	assessments and monitor its performance.	<p>criminal convictions or offences.</p> <ul style="list-style-type: none"> •large scale, systematic monitoring of public areas (CCTV). 	<ul style="list-style-type: none"> •An assessment of the necessity and proportionality of the processing in relation to the purpose. •An assessment of the risks to individuals. •The measures in place to address risk, including security and to demonstrate that we comply. <p>Once the DPIA has been created the DPO will be responsible for signing off the final assessment and confirming that the project is lawful.</p> <ul style="list-style-type: none"> • Review the DPIA • Make amendments where appropriate • Negotiate the changes with the department • approve the assessment 	1 week
Task 13	To cooperate with the supervisory authority in all matters relating to information governance; and to investigate regulatory complaints in accordance with relevant regulatory requirements.	<p>The DPO will be the Councils lead contact for all data protection matters. the DPO will ensure that the Council effectively communicates with the Supervisory authority in any matter the supervisory deems fit (in relation to information governance).</p> <p>The DPO will be required to act as the key link between the Council and the supervisory authority ensuring the council complies with all reasonable requests made and ensuring that any and all recommendations, directions, decision notices etc. issued by the supervisory authority are implemented within the Council.</p>		Monthly
Task 14	To act as the contact point for the supervisory authority on issues relating to processing, including the prior consultation, and to consult, where appropriate, with regard to any other matter relating to information governance.	<p>The DPO will be the Councils lead contact for all data protection matters. the DPO will ensure that the Council effectively communicates with the Supervisory authority in any matter the supervisory deems fit (in relation to information governance).</p> <p>The DPO will be required to act as the key link between the Council and the supervisory authority ensuring the council complies with all reasonable requests made and ensuring that any and all recommendations, directions, decision notices etc. issued by the supervisory authority are implemented within the Council.</p>		Monthly
Task 15	To promote data protection compliance and best practice by setting and maintaining standards and procedures, ensuring the Councils data protection policies are up to date and disseminate any changes in the legislation to key members of staff.	<p>To develop all internal policies and procedures required to demonstrate compliance with the legislation. These policies must be approved by full Council. The DPO must prepare all relevant reports that will be considered within full council and attend such meetings where required.</p> <p>Once the policies have been approved the DPO will be responsible for disseminating them to all members of staff, ensuring that all departments are aware of their responsibilities and the sanctions should a member of staff fail to follow them.</p>		Annual Monthly
Task 16	Oversee the management of freedom of information requests, environmental information requests and data protection requests pursuant to individual rights under data protection and privacy legislation.	<p>As per task 4 the DPO will ensure that the IGO is performing their role effectively and will ensure that the council remains compliant with the access to information legislation.</p> <p>Where appropriate the DPO will provide the IGO with additional resource and training in order for them to complete this task to the best of their ability.</p>		Weekly
Task 17	To carry out reviews of the Councils decisions to refuse requests under the Freedom of Information Act 2000, Environmental Information Regulations 2004 and the Data Protection Regulations where required, whilst ensuring that the original decision made by the Information Governance Officer was accurate and where appropriate overturn any decisions previously made.	<p>On receipt of an appeal the DPO will be required to reassess the suitability of the exemption applied and consider whether the exemption has been engaged correctly.</p> <p>The DPO may also consider the application of additional exemptions in doing so considering the application of the public interest test and any other test established by the supervisory authority in applying individual exemptions.</p>	<p>This will involve carrying out a complex review of the IGO original decision and where appropriate either upholding or rejecting the IGO original decision.</p> <p>Appeals must be responded to within 20 working days from the date of receipt.</p>	Monthly
Task 18	Advise on all elements of processing personal data internationally and on the requirements and implications of data protection laws.	<p>Where appropriate research the data protection laws within the other countries jurisdiction.</p> <p>Inform departments of these additional responsibilities by drafting sound legal advice which will outline exactly what the department is required to do in order to comply with both countries data protection legislation.</p> <p>Where appropriate draft appropriate data protection clauses into the service contracts of if required draft a stand alone agreement which outlines the appropriate legal clauses which enable to lawfulness of the processing.</p> <p>consult the supervisory authority in order to gain their approval before the international processing takes place.</p> <p>Liaise with the international countries supervisory authority in order to ensure the countries data protection laws are adequate and compatible with the UK's data protection legislation.</p> <p>Approve all international transfers of personal data.</p>		<p>This is a significant task which would take a considerable length of time to complete.</p> <p>The DPO must carry out this function as and when required.</p>

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Task 19	To provide detailed advice in relation to Direct Marketing specifically relating to data protection requirements and the Privacy of Electronic Communications Regulations 2003. Where appropriate drafting a legal notice to ensure compliance with the statutory provisions, including advice relating to opt in/out clauses.	<p>Take the lead in ensuring that all direct marketing activities are formulated within specific legal agreements.</p> <p>The DPO will draft all notices that must be communicated to individuals and detail how the Council is complying with the legislation.</p> <p>Each notice must be individually drafted to suit the requirements of the processing activity.</p>	<p>Effectively liaising with departments in order to establish what type of notice must be drafted.</p> <p>Ensure that correct consent to use personal information for direct marketing has been received prior to the processing of information for these purposes.</p> <p>Ensure that all individuals are made aware that they can opt-out of such processing activities at any time.</p> <p>Ensure that all notices are drafted in accordance with the legislation and contain the required information.</p> <p>Ensure that the departments are aware that all individuals that will be engaging with their services are provided with a copy of the relevant notice.</p>	Monthly
Task 20	To provide expert advice to the Council and where appropriate draft privacy notices, fair processing notices, collection statements and any other data protection notices in order to ensure that individuals are aware of our intentions to process their data and ensuring that the Council is processing personal data in a fair and lawful manner in line with the individual rights.	<p>Take the lead in ensuring that all data processing activities are formulated within specific legal agreements.</p> <p>The DPO will draft all notices that must be communicated to individuals and detail how the Council is complying with the legislation.</p> <p>Each notice must be individually drafted to suit the requirements of the processing activity.</p>	<p>Effectively liaising with departments in order to establish what type of notice must be drafted.</p> <p>Ensure that all notices are drafted in accordance with the legislation and contain the required information.</p> <p>Ensure that the departments are aware that all individuals that will be engaging with their services are provided with a copy of the relevant notice.</p>	Daily
Task 21	To investigate and report on any processing, blocking, erasure, destruction and the right to be forgotten notices issued by individuals in accordance with the relevant articles contained within the Regulations, ensuring that the purposes of the processing are compatible with the conditions for processing in accordance with the Regulations and responding to the individual accordingly.	consider the legalities of all such requests received, making high level decisions relating to each requests by either accepting or rejecting the proposal providing detailed legal justification for the decision. The DPO must respond to the applicants within 20 working days notifying them of the Councils decision explaining the legal justifications behind the decision.		Daily
Task 22	Take the lead in responding to any legal claims issued against the Council for damages relating to breaches of data protection. Liaising where appropriate with the Legal Department.	<p>As the Councils expert in data protection the DPO will be required to provide legal advice relating to the processing activity that lead to the claim. Where appropriate the DPO will be responsible for supplying the legal department with all information required in order to defend the claim.</p> <p>The DPO may also be asked to attend court or a tribunal in order to give evidence supporting the Councils processing activities.</p>		Monthly
Task 23	To provide expert advice in relation to any data protection queries regarding the use of social media and report any serious issues to the Deputy Chief Executive.	<p>the DPO will be responsible for implementing and enforcing the Councils policy relating to the use of social media in relation to data protection issues.</p> <p>Should any member of staff breach data protection through the use of social media the DPO will be responsible for investigating the breach and reporting all failures to the Deputy Chief Executive.</p> <p>On receipt of such a notification the DPO will be responsible for establishing whether there has been a breach in the legislation. The DPO will be required to gather all evidence relating to the breach which will involve receiving copies of the disclosed information, carrying out an investigation into the circumstances surrounding the breach, notifying the relevant employees within the Council and where necessary the affected individuals.</p>	<p>Carry out investigation interviews with members of staff</p> <p>gather appropriate evidence in order to establish what happened and how to prevent similar incidents from occurring in the future.</p> <p>Ensure that effective communication links are established between the DPO and Council employees.</p> <p>Draft appropriate breach and incident reports that will identify any weaknesses in Council procedures and make recommendations for the council to implement which should ensure that such a breach should not reoccur.</p>	Breaches of the legislation occur intermittently, investigating a breach will take approximately one month from start to finish. Therefore depending on the number of breaches reported will determine the length of time the DPO spends dealing with and resolving such matters.

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Task 24	Undertake and manage data protection audits and reviews across all Council services that are processing personal data in order to ensure that the Council is compliant with the legislation.	<p>These audits will provide assessments of whether each department that is processing personal data is following good data protection practice. Audits will play a key role in determining whether the Council is understanding and meeting our data protection obligations. The audits will look at whether we have effective policies and procedures in place and whether internal departments are following them, the overall report will include recommendations on how the department can improve.</p> <p>The Data protection audits will outline how the Council is complying with the principles and articles located in the Regulations. They will typically cover the following areas:</p> <ol style="list-style-type: none"> 1. data protection governance, governance structures policies and procedures relating to data protection compliance. 2. the process for managing both electronic and manual records containing personal data. 3. the processes for responding to requests for personal data, which will include subject access requests as well as those made by third parties, and sharing agreements. 4. the technical and organisational measures in place to ensure that there is adequate security over personal data held in electronic or manual form. 5. the provision and monitoring of staff data protection training and the awareness of data protection. 	<p>The DPO will contact each department and agree the scope of the audit which will be formally documented in a letter of engagement. Once the scope of the Audit has been agreed the DPO will undertake the following tasks:</p> <ol style="list-style-type: none"> 1. Carry out an off site check of the departments policies, procedures, privacy notices, collection statements, data sharing agreements etc. 2. Carry out an onsite review of the procedures in practice. 3. Interview the relevant members of staff who are responsible for information governance within that department 4. Provide a report which outlines good practice and any areas for improvement with practical recommendations that help the department address these where appropriate. 5. Allow the department to respond to the observations and recommendations made by the DPO. 6. Prepare and executive summary for presentation to the Deputy Chief Executive for consideration during senior management teams. 7. Carry out a follow up review approximately six months after the audit and annual reviews thereafter (unless a significant breach has occurred, in which case the department may be audited sooner). 	<p>All departments processing personal data should be audited annually. 3 days 1-2 days 1 day 1 week N/A - the department will be given 2 weeks to respond. 3 days (Once the report has been agreed) As above Total Time = Approx. 3 weeks</p>
Task 25	To manage, investigate and resolve all complaints from individuals in relation to their rights under the data protection laws and Human Rights Act. Ensuring that adequate reporting mechanisms are in place for recording such complaints.	<p>On receipt of such a notification the DPO will be responsible for establishing whether there has been a breach in the legislation. The DPO will be required to gather all evidence relating to the complaint which may involve reviewing Council policies or the practices of the member of staff concerns. If a complainant is able to demonstrate that a breach of the HRA has occurred then the DPO will be required to carry out an investigation into the circumstances surrounding the breach, notifying the relevant employees within the Council and where necessary any other organisations that may be a factor in creating the breach.</p> <p>The DPO will be responsible for resolving such issues and ensuring the Councils practices are changed in order to ensure that no further breaches occur.</p>	<p>Carry out investigation interviews with members of staff</p> <p>gather appropriate evidence in order to establish what happened and how to prevent similar incidents from occurring in the future.</p> <p>Draft appropriate incident reports that will identify any weaknesses in Council procedures and make recommendations for the council to implement which should ensure that such a breach should not reoccur.</p> <p>Liaise effectively with the complainant ensuring that they are satisfied with the outcome of their complaint.</p> <p>Implement a system which records the details of the breach and what remedies should be implemented by the Council for future working practices.</p>	<p>The Council has received a number of complaints relating to breaches of the HRA.</p> <p>Investigating a breach will take approximately one month from start to finish. Therefore depending on the number of breaches reported will determine the length of time the DPO spends dealing with and resolving such matters.</p>
Task 26	Investigate breaches and incidents of data protection, establishing any potential weaknesses in Council policies and inform the Information Governance Forum accordingly. Formally report all compliance issues relating to information governance, including any complaints and breaches of the legislative framework to the Deputy Chief Executive.	<p>On receipt of such a notification the DPO will be responsible for establishing whether there has been a breach in the legislation. The DPO will be required to gather all evidence relating to the breach which will involve receiving copies of the disclosed information, carrying out an investigation into the circumstances surrounding the breach, notifying the relevant employees within the Council and where necessary the affected individuals.</p> <p>Within 72hours of becoming aware of the breach the DPO will be responsible for ensuring that the supervisory authority has been notified. The DPO will then continue to liaise with the Supervisory Authority and where appropriate implement any recommendations outlined within the supervisory authorities decision letters.</p>	<p>Carry out investigation interviews with members of staff</p> <p>gather appropriate evidence in order to establish what happened and how to prevent similar incidents from occurring in the future.</p> <p>Ensure that effective communication links are established between the DPO and Council employees in order to ensure that all breaches are sent tot the supervisory authority within the 72 hour timeframe.</p> <p>Draft appropriate breach and incident reports that will identify any weaknesses in Council procedures and make recommendations for the council to implement which should ensure that such a breach should not reoccur.</p>	<p>Breaches of the legislation occur intermittently, investigating a breach will take approximately one month from start to finish. Therefore depending on the number of breaches reported will determine the length of time the DPO spends dealing with and resolving such matters.</p>
Task 27	Provide advice and assist with all data protection queries relating to projects, programmes and data sharing initiatives.	<p>In order for the Council to share data with other public sectors and outside organisations, to avoiding data breaches, it is essential to have effective information governance procedures and strategies in place. The DPO will be responsible for ensuring that all data sharing initiatives comply with the highest level of data protection standards, limiting the likelihood of a data breach and ensuring the appropriate legal measures are in place.</p> <p>The DPO will be the Councils main point of contact for both internal and external organisations for advising on data sharing issues. The DPO will also ensure that all data sharing arrangements remain compliant with the Wales Accord for Sharing Personal Information.</p> <p>Where MTCBC is the lead authority for data sharing arrangements the DPO will be responsible for reviewing these arrangements in order to ensure that they are working effectively and where possible update and amend the arrangements.</p>	<p>Assist departments with establishing the processes deployed and the legal frameworks engaged to allow for the processing to commence.</p> <p>Attend meetings as appropriate</p> <p>review all data sharing agreements that the Council enters into.</p> <p>Where a WASPI agreement is not appropriate draft a suitable data sharing agreement that relates specifically to the data sharing activities required.</p>	<p>Weekly Several times a month Annually As and when required</p>

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Task 28	Co-ordinate information governance activities with Data Protection Officers in the South Wales Information Forum in relation to information management activities and attend such information governance meetings as necessary.	To raise awareness and discuss national issues relating to data protection, representing the Council at high level meetings ensuring that MTCBC is effectively represented in establishing solutions to current data protection issues faced by all authorities within Wales.	Attend all relevant meetings Assist other Welsh LA's with any queries they have relating to issues faced by all LA's within Wales Jointly work with the data protection leads within other LA's in order to create an effective solution for data protection issues that will then need to be addressed and implemented across the Council.	Monthly Several times a month Weekly
Task 29	In relation to the performance of these tasks have due regard to the risk associated with processing operations, taking into account the nature, scope, context and purposes of processing.	The DPO will be required to attend all necessary training courses in order to ensure they remain up to date with all legislative changes and advancements. In doing so they will be able to ensure that all departments receive accurate advice and therefore all risks connected with processing should be minimised.	Attend regular training courses. Keep up to date with all supervisory authority directions Notify key members of staff of any issues that may be relevant to their processing activities and therefore minimising the risks of failures in the council's data protection compliance.	Monthly Daily Weekly