

## Appendix 1

## RAG Summary of GDPR Compliance Monitors

v0.3 January 2019

[illegible]

IT Services - Systems and Data Security
Secure storage arrangements are in place and documented to protect records and equipment in event of loss, damage, theft or compromise of personal data.
Documented procedure in place to securely dispose of records and equipment when no longer required.
Hardware and software assets are documented; management policy in place
Security of mobile working and the use of mobile computing devices in place.
New and existing hardware configured to reduce vulnerabilities and provide only the functionality and services required.
Controls in place to manage the use of removable media in order to prevent unauthorised disclosure, modification, removal or destruction of personal data stored on it.
User accounts to authorised individuals set up to provide the appropriate permissions and access to information.
Password security policy and rules in place to detect any unauthorised access or anomalous use.
Anti-malware defences in place to protect computers from malware infection.
Routine back-ups of electronic information in place to help restore information in the event of disaster.
User and system activity logged and monitored to identify and help prevent data breaches.
Security patching policy is place to prevent the exploitation of technical vulnerabilities
Boundary firewalls in place to protect computers from external attack
Personal data and information under management to identify / rectify potential risks to security

Key	
Not yet started	
Partially implemented	
Fully implemented	
Not applicable to this department	

## Appendix 2



**Example GDPR Compliance Monitor. Dummy information for demonstration purposes only.**

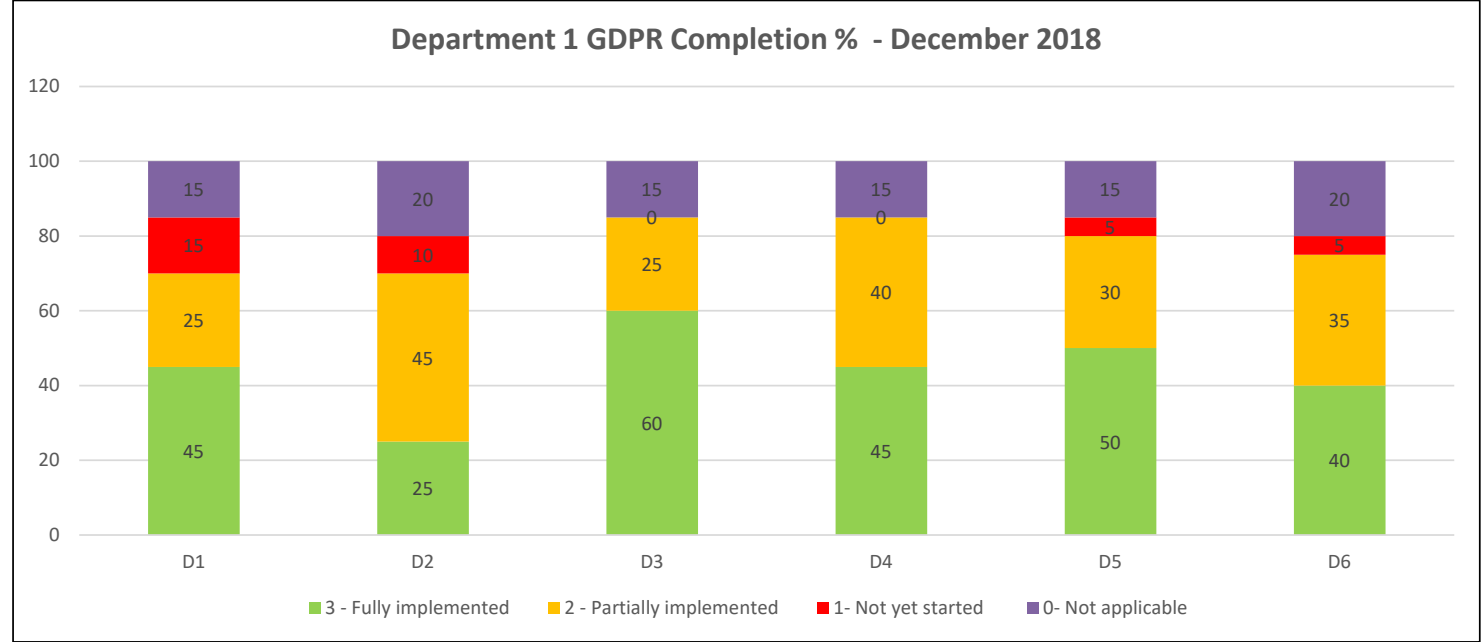
GDPR Departmental Self-Audit Monitor							Exceptions
Department : 1 Reporting Period: December 2018	D1	D2	D3	D4	D5	D6	
Compliance Action	Enter a number between 0-3 using the definitions below against each compliance action						
GDPR Risks							
Areas where there are risks to GDPR compliance such as insecure data handling are notified to AIN reps and the Compliance Team.	3	2	3	3	3	3	
Awareness - Communication & Guidance							
Any job-specific training needs are identified and being managed	3	2	3	2	1	2	
All staff are aware of the GDPR issues and queries process	3	2	3	3	3	2	
ROPA and Records Management							
Records Retention Schedule in place	3	3	3	3	3	3	
Process for updating Retention Schedule is in place	2	2	2	2	2	2	
ROPA in place	3	3	3	3	3	3	
Process for updating ROPA is in place	1	2	2	2	3	2	
Communicating privacy information							
Privacy notices (how the City of London Corporation as a data controller collects and uses personal information) are in place	0	0	0	0	0	0	
Lawful basis for processing personal data - consent							
Records are kept for where consent has been received from the data subject	2	1	2	2	2	1	
Contracts							
There are written agreements in place for new contracts with third party service providers and processors, including those who process personal data on behalf of the City of London Corporation as a data controller, that ensure the personal data that they access and process is protected and secure.	0	0	0	0	0	0	
Data Subjects Rights							
All relevant staff are aware of the process for an individuals' requests to access their personal data (SAR , Right to Access )	1	2	3	3	3	2	
Guidance is in place to respond to individuals' other rights							
Right to rectification							
Right to Erasure							
Right to Restriction	1	1	3	2	2	3	
Right to Data Portability							
Right to Object							
Right to Object to Automated Decision Making / Profiling							
Guidelines for processing children's data are in place	2	2	2	3	3	2	

Data Protection							
All staff have read the CoL Data Protection Policy 2018	3	3	3	2	3	3	
All staff are aware of the Data Protection Impact Assessment Procedure & Guidance	3	3	3	3	3	3	
All relevant staff are aware of the process for identifying and reporting a Data Protection breach	3	3	3	3	3	3	
Electronic communications conform to PECR (Privacy and Electronic Communications Regulations) i.e marketing by phone, email, text ; use of cookies or a similar technology on the CoL website; or compiling a telephone directory (or a similar public directory)	3	0	3	3	2	0	
Guidance in place for transferring data securely outside of the EU	0	0	0	0	0	0	
Guidance in place for transferring data securely between CoL and 3rd parties	2	2	3	2	2	3	
All staff have read the CoL Security Policy - People	2	2	2	2	2	2	

DO NOT ENTER DATA IN THESE CELLS						
Count	D1	D2	D3	D4	D5	D6
3 - Fully implemented	45	25	60	45	50	40
2 - Partially implemented	25	45	25	40	30	35
1- Not yet started	15	10	0	0	5	5
0- Not applicable	15	20	15	15	15	20

**Supplementary Notes**  
These questions and definitions are largely taken from the ICO GDPR self-assessment tool

**Compliance Graph**



Appendix 3 Table: Departments completion of the Data Protection E-Learning Programme, as of 1 January 2019

Department	Complete	Percentage	In Progress	Percentage	Not yet started	Percentage	Exempt	Percentage	Temporary Exempt**	Percentage	Total	Overall Percentage***
Barbican	367	81.02%	14	3.09%	41	9.05%	21	4.64%	10	2.21%	453	<b>87.86%</b>
CCC/Mansion House	143	96.62%	0	0.00%	3	2.03%	2	1.35%	0	0.00%	148	<b>97.97%</b>
Chamberlain's	293	94.82%	3	0.97%	4	1.29%	7	2.27%	2	0.65%	309	<b>97.73%</b>
City Surveyors Department	247	89.49%	1	0.36%	3	1.09%	21	7.61%	4	1.45%	276	<b>98.55%</b>
Comptroller's and City Solicitors	61	96.83%	0	0.00%	0	0.00%	2	3.17%	0	0.00%	63	<b>100.00%</b>
Dept. of the Built Environment	252	96.92%	3	1.15%	1	0.38%	4	1.54%	0	0.00	260	<b>98.46%</b>
Dept. Communities and Children's Services	336	81.55%	7	1.70%	10	2.43%	54	13.11%	5	1.21%	412	<b>95.87</b>
Guildhall School of Music and Drama	280	86.69%	17	5.26%	22	6.81%	3	0.93%	1	0.31%	323	<b>87.93%</b>
Markets and Consumer Protection	251	91.61%	0	0.00%	2	0.73%	19	6.93%	2	0.73%	274	<b>99.27%</b>
Misc.****	4	50.00%	0	0.00%	4	50.00%	0	0.00%	0	0.00%	8	<b>50.00%</b>
Open Spaces	332	68.60%	6	1.24%	31	6.40%	113	23.35	2	0.41	484	<b>92.36%</b>
Remembrancers	30	90.91%	1	3.03%	1	3.03%	1	3.03%	0	0.00%	33	<b>93.94%</b>
Schools*	516	88.36%	14	2.40%	31	5.31%	14	2.40%	9	1.54%	584	<b>92.29%</b>
Town Clerks Department	317	90.05%	7	1.70%	14	3.40%	9	2.18%	11	2.67%	412	<b>94.90%</b>
<b>Total</b>	<b>3483</b>		<b>73</b>		<b>167</b>		<b>270</b>		<b>46</b>		<b>4039</b>	

\* The totals provide for schools, is a combined total for the city of London School, City of London School for Girls and the City of London Freeman's School.

\*\* Those marked temporary exempt will need to complete the course on their return to work, for example they are on a period of long term absence, maternity leave, etc.

\*\*\* The overall percentage is a combined total of those who have completed the course, have been made exempt or are temporarily exempt.

\*\*\*\* Anyone who has not been assigned a department e.g. Contractors