

CR25 GDPR project

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Appendix 3

Rows are sorted by Risk Score

Risk no, title, creation date, owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score		Risk Update and date of update	Target Risk Rating & Score		Target Date	Current Risk score change indicator
CR25 General Data Protection Regulation Project (previously CCS 006) 01-Dec-2017 Michael Cogher	Cause: Insufficient resources, inadequate corporate/departmental systems and procedures are established and tested which meet the additional requirements of GDPR legislation. Event: CoL is unable to comply with GDPR requirements - poor, non-secure and non-compliant processing of personal data by the 25 May 2018 when GDPR is live. Effect: CoL exposed to adverse publicity, reputational damage, financial penalties imposed by the Information Commissioners Office. Increased volume of Subject Access Requests.	Likelihood Impact	12	Awaiting confirmation as a corporate risk. 18 Dec 2017	Likelihood Impact	4	18-May-2018	↔

Action no	Description	Latest Note	Managed By	Latest Note Date	Due Date
CR25a	1. Ensure compliance with CoL governance and committee reporting requirements. 2. Project Team to report to Information Management Board. 3. Data Protection Officer to report to Summit Group and relevant Committees.	GDPR Reports: <ul style="list-style-type: none"> • Summit Group 27.07.2017 • Policy Resources Committee 21.09.2017 • Establishment Committee 15.09.2017 • Audit & Risk Committee 10.10.2017 • IT Steering Group 20.11.2017 • IT sub-committee 24.11.2017 	Michael Cogher	04-Dec-2017	18-May-2018
CR25d	To implement a GDPR governance framework which supports the overall delivery of the GDPR project.	1. Michael Cogher appointed as CoL (not CoLP) Data Protection Officer and Project Director 2.CCS Business Manager to provide project support and cohesion to the GDPR project Team. 2. GDPR Project Team to meeting monthly and on an as required basis to review project progress, identify issues, blockages, risks.	Michael Cogher	04-Dec-2017	18-May-2018
CR25e	Reports to relevant senior management meetings and committees: <ul style="list-style-type: none"> • Summit Group • Audit & Risk Committee • Policy & Resources Committee • Establishment Committee • IT sub-committee • Information Management Board 	<ul style="list-style-type: none"> • Summit Group 27.07.17 • Establishment Committee 15.09.17 • P&R Committee 21.09.17 • Audit & Risk Committee 10.10.2017 • IT Steering Group 20.11.17 • IT Sub-committee 24.11.17 	Michael Cogher	01-Dec-2017	18-May-2018
CR25f	Delivery of the GDPR work programme.	<ul style="list-style-type: none"> • Project plan audited and approved by Mazars October 2017 • GDPR training sessions developed and delivered to Access to Information Network Representatives (AIN) from all departments. • Record of Processing Activities audit developed and distributed to AIM Reps - response deadline 15.01.2018 • GDPR relevant ICT policies drafted and circulated.30.11.2017. 	Nick Senior	04-Dec-2017	18-May-2018

