

Data Protection Plan 2024/25



Data Protection Strategy and Annual Plan

1. Data Protection Strategy

The Data Protection Strategy is the way the Data Protection team delivers the services needed by East Suffolk Council. It sets out how data protection supports and builds a better organisation.

Data Protection supports the Council and adds organisational value in the following ways:

Data Protection Function	Purpose and Value
Data Protection Officer (DPO)	The provision of independent advice (as required by data protection law) and an expert in data protection. The monitoring of internal compliance with UK General Data Protection Regulation (UK GDPR), Data Protection Act 2018 and the Councils data protection policies with due regard to the risk associated with processing operations. Demonstrates the Councils compliance with and accountability under the UK GDPR and Data Protection Act 2018. Reports to the highest management level giving Senior Management and Councillors confidence in the Councils compliance with data protection legislation. Proactive in raising awareness, providing training and keeping up to date with changes to data protection legislation.
Advice, Support and Guidance	Provision of independent strategic and operation-level advice, support and guidance on data protection, risk and control processes. Attendance at corporate meetings.
Audit and Governance Committee	Preparation and presentation of reports to the Audit and Governance Committee. Provision of training to Members. Provision of advice and support to members of the Committee.
Internal Management	Day to day management of the internal data protection function. Ongoing quality control of data protection services.
Internal Self-Assessment	Self-assessment of data protection procedures for quality and compliance purposes. Required annually for conformance with Information Commissioner’s Office guidance.
Internal Training, Development and Awareness	Building knowledge and awareness within the Data Protection team. Provides an understanding of developments that may affect the Council, its data protection risk and compliance needs. Knowledge sharing within the organisation. Liaison with other data protection leaders to share and develop knowledge and professional best practice.
Contingency	Provision for unplanned, emergent work. Allows a flexible, responsive data protection function.

Data Protection's strategic priority is to comply with the UK GDPR and the Data Protection Act 2018 as legal frameworks, which the Council must adhere to, and in doing so provide confidence to Audit and Governance Committee of the Councils compliance with both pieces of legislation. The focus of data protection activity planned for

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the 2024/25 financial year is the provision of advice, support, guidance and training in accordance with UK GDPR and Data Protection Act 2018, as set out in the next section's Data Protection Plan.

The Data Protection plan undertakes all activities in line with and adhering to its legal obligations under both UK GDPR and the Data Protection Act 2018. Data Protection actions completed in line with both legislations are fundamental to support the Council's foundations of corporate governance, risk and control.

Other activities will be undertaken as directed by the Head of Internal Audit/Data Protection Officer and are intended to support one or more of (1) delivery of the Data Protection Plan, (2) development of the Data Protection function, (3) compliance with UK GDPR and Data Protection Act 2018, or (4) organisational needs.

2. Data Protection Plan

In order to support the Committee, the Head of Internal Audit/Data Protection Officer has completed the data protection plan based on the annual core activities and project/initiatives identified as part of the 2023/24 ICO self-assessment and the confidence needs she believes the Committee has.

Since the COVID-19 pandemic in 2020, the Council and its Data Protection service has had to adapt to an unprecedented level of change. It is clear the changes implemented in response to the COVID-19 pandemic, such as hybrid working, will continue to remain in force and to affect the Council and its strategic ambitions, and the Data Protection service will continue to respond accordingly.

The Council's Data Protection plan is focused on supporting the organisation in the achievement of its objectives. It also seeks to balance the Council's need for compliance with the demands of delivering essential Council activities by service areas. It is important to note that although Data Protection supports and seeks to accommodate the needs of service areas wherever possible, the Data Protection function must also remain unfettered and free from interference.

The plan is fluid and expected to change over the 12 months it covers. In line with the Data Protection Strategy, the following activities are considered essential to meet the compliance requirements under data protection legislation and for the confidence of the Audit and Governance Committee in 2024/25.

Area of Core Activity	Purpose of Data Protection
Strategic Advice and Guidance	Provision of guidance, advice and monitoring by the Data Protection Officer and Deputy Data Protection Officer.
Data Protection Subject Access Requests (SARs)	To comply with the legal duty to provide information to Data Subjects
Data Incidents and Breaches	Responding to <ul style="list-style-type: none"> Confirmed breaches

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	<ul style="list-style-type: none"> • Non-compliance with legislation
Data Protection Administration	<p>Verifying and coordinating requests for personal data and supporting internal service areas on:</p> <ul style="list-style-type: none"> • Data Protection Impact Assessments • Data Sharing Agreements • Provision of general Data Protection Advice • Privacy Notices • Partnership working with other Suffolk Councils and external Information Governance groups.
Data Protection Training	<p>Training to service areas on:</p> <ul style="list-style-type: none"> • Data Protection Impact Assessments • Project teams/Project Managers • New Starter Inductions • Bespoke training for individual service areas (e.g. Planning and Environmental Services) • Bite sized training to be undertaken after a breach has occurred • Annual completion of the E-Learning Data Protection training via Oracle • Data Protection Champions training • Councillor/Members training • SharePoint updates and communications
ICO Self-Assessment	Review of internal procedures against ICO recommended practice
CCTV Review	Review ESC run CCTV (not ESSL managed CCTV) of internal procedures against Surveillance Commissioner and ICO recommended practice
Policies and Procedures	<p>Review, Refresh and Drafting of existing and new policies:</p> <ul style="list-style-type: none"> • Information Classification Policy • Information Asset Registers review and update • Data Quality and Management Policy • Roles and responsibilities for Data Protection Champions • Information Risk and Records Management Policy • Clear Desk Policy • Marketing Policy

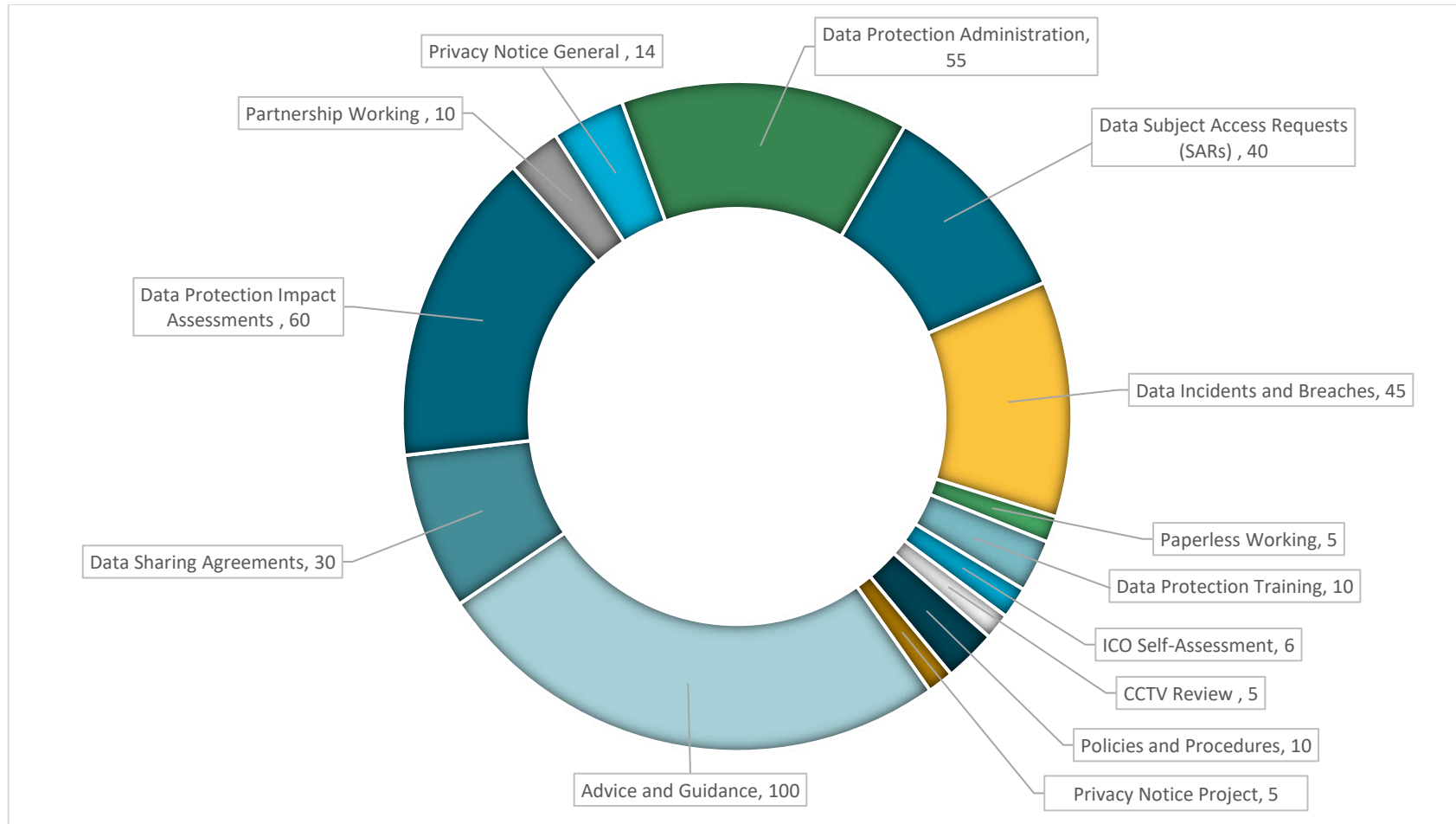
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Data Sharing Agreement Review	Review of all DSAs held against the contracts register
Privacy Notices	Review of current privacy notices published on ESC website. Drafting and finalising of privacy notices for all service areas within ESC.
Paperless Working	Development of eForms for internal Data Protection reporting and activity

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At the time of drafting, the Data Protection team anticipate their time to be allocated as follows:



*Value is equivalent to days spent 2024/25

How the Data Protection Plan will be Delivered

3. Resources

The Data Protection team consists of an Information Governance Officer and an Information Governance Administrator the equivalent of 2 FTE.

For the period 1 April 2024 to 31 March 2025 total resources available for Data Protection team activities is 395 working days. This excludes time taken by the Data Protection Officer and Deputy Data Protection Officer.