GDPR Subject Area	Progress to Date	Further activity planned	Current Project status
Maintain records of data processing	Information Asset Register (IAR) is now in place across all teams and holds details of all retained information. Will be subject to continuous review. Data retention policy published.	Database of information data flows to be completed.	
Data Security Measures (1)	Cyber Security Essentials accreditation achieved following an independent audit.	Cyber Essentials Plus accreditation planned for later in 2018.	
Data Security Measures (2)	The internally developed systems, DART & EPIC, have been updated with additional security and auditing functionality.	An independent vulnerability assessment is planned in conjunction with SY Police.	
Data Security Measures (3)	Secure encrypted email in place for exchange of data with members and employers. Data Protection Policy revised and approved in line with Audit IT Risk Assessment.	New SQL database server to host encrypted data built and in testing. Main pensions database (UPM) and other systems will move to encrypted server once supported.	
Privacy Statements/Notices	Privacy statement published on website and referenced in standard documentation for new joiners to the fund.	Publish privacy notice in annual statements to active and deferred members and review standard documentation for all member types.	
Lawful Processing of Data	All employers in the fund have been issued with a memorandum of understanding confirming we have legitimate basis for processing data on their behalf and no data sharing agreement is required.	NA.	
Breach Management Process	Beach reporting policy published and quick links to reporting breaches created on staff intranet home page. All staff briefed on reporting requirements.	Bespoke training on breach reporting to be provided to all staff.	
Staff Training and Awareness	All staff within SYPA completed the BMBC online development tool on GDPR compliance.	See above.	
Service Provider Contracts	A number of data sharing agreements signed but legal advice requested from BMBC to confirm compliance with GDPR requirements.	Completion of all data sharing agreements.	
Policy/Governance	Working group of senior managers within SYPA review progress monthly against ICO Data	Ongoing review.	

	Controller Checklist. Overall ownership of project managed by Head of Pensions Administration.		
Data Protection Officer (DPO)	Meeting taking place with BMBC DPO at end of May to confirm arrangements for acting as DPO for SYPA.	Confirmation of DPO.	