**Appendix 1: Information Governance Action Plan**

SOUTH YORKSHIRE
PENSIONS AUTHORITY

| Action | Implication - Description | Status | Target Impl. Date | Revised Target Impl. Date | No of Date Revisions | Agreed Action | Update | Action Owner | Supported By |
|---|---|---|---|---|---|---|---|---|---|
| Data Protection Impact Assessment (DPIA) | New projects, procurements and process may impact on personal data - an effective DPIA process needs to be implemented as standard | Not Yet Due | 30-Nov-2022 | | | DPIA to be drafted and implemented. Any person who is responsible for introducing new or revised service or changes to a system, process or information asset is responsible for ensuring the completion of a DPIA. | 03/10/22 Initial draft being reviewed by internal team. | HoPA | CMG G&RO |
| Information Sharing Agreement (ISA) | Current arrangements are for individual contract wording to capture data sharing. A consistent approach is required in the form of SYPA Information Sharing Agreement | Not Yet Due | 30-Nov-2022 | | | ISA to be drafted and implemented. Will be used for all new contracts moving forward and built into Procurement gateway approval process | 03/10/22 Initial draft being reviewed by internal team. | HoPA | CMG G&RO |
| Data Breach Process | Breach process review to take place - looking to enhance current systems rather than rewrite | Not Yet Due | 31-Dec-2022 | | | Governance Team to be set up with Data Breach e-mail Alert from SharePoint Breach System. General Information Governance inbox to be set up for Governance Team for above alerts and any other Information Management queries | | HoPA | CMG G&RO |
| Data Protection Policy | Current policy potential updates required | Not Yet Due | 31-Dec-2022 | | | Full review and update of Data Protection Policy | | HoPA | CMG G&RO |
| Freedom of Information Process (FOI) | Systems in place - ensure policy references are up to date | Not Yet Due | 31-Jan-2022 | | | Review of inbox process along with any policy and procedural references | | HoPA | CMG G&RO |
| Data Subject Access Request (DSAR) | Ensure systems and operating procedures in place to ensure timely response | Not Yet Due | 31-Jan-2022 | | | Review of notification process, draft operating procedures, review any policy references | | HoPA | CMG G&RO |
| Retention Policy | Requires review and update - particular focus on retention of medical information. | Not Yet Due | 31-Mar-2022 | | | Initial review to be in place by end of March, however this will be a bigger piece of work linking into Asset Registers | | HoPA | CMG G&RO |
| Asset Register | Registers currently in place but require review with a view to avoiding duplication of data in multiple teams | Not Yet Due | end of year | | | Large piece of work starting March next year - linking to potential use of new systems/software | | HoPA | CMG G&RO |
| Data Protection Training | Training material , including cyber security ,to be reviewed in good time for refresher training | Not Yet Due | 30-Apr-2022 | | | Look at potential new sources of training (may link to new systems) | | HoPA | CMG G&RO |

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|---|---|---|---|---|---|---|---|---|---|
| Privacy Notices | Ensure that all relevant stakeholders are covered | Not Yet Due | 31-Dec-2022 | | | Review and update or draft where necessary - Scheme members (inc children), Staff, Authority and Board Members. | | HoPA | CSM, CO |
| Policy Review | To ensure all policies and associated operating procedures are up to date | Not Yet Due | 30-Jun-2022 | | | Overarching policy tracker to be in place (will include all information management policies). Potential link to new risk. Projects system - will ID policy owner, review dates, if statutory, requires website upload etc. | | Governance Team | CMG G&RO CO |
| General raising awareness | Promoting good practice and awareness of procedures to avoid breaches | Not Yet Due | 31-Jan-2022 | | | Develop ideas such as screensavers etc. to give simple messages and raise awareness - How to report etc. Work with Comms Officer and ICT team on this | | HoPA | CMG G&RO |

**Development and Approval Process**
1. Responsible person/team prepares draft
2. Review by internal colleagues as appropriate
3. Initial sign off by HoPA
4. Internal Audit review
5. SMT sign off
6. Work with Comms Officer to share with staff, publish on website/SharePoint etc.
7. Review at appropriate timescale

**Key:**
HoPA: Head of Pensions Administration
CMG: Corporate Manager - Governance
G&RO: Governance & Risk Officer
CSM: Customer Services Manager
CO: Communications Officer