

Appendix 1						
		Milestones (aligned to the ICO Undertaking requirements)	Tasks	Progress	Lead officer	Partners
<b>Phase 1: Interim Approach (H&amp;F)</b>  <b>Objective:</b> Compliance with the ICO Undertaking requirements for H&F	1	"Target staff training and PCS sign-up to all those H&F employees who have not done so by 31 March 2015"	Obtain Cabinet Member approval for the project and funding	In Progress	Ciara Shimidzu	
			Recruit an expert to deliver on Phase 1		Ciara Shimidzu	
			Undertake a gap analysis using the last compliance report from Trent on 31 March 2015 and all staff listed on Active Directory as of 31 August 2015	In Progress	To be recruited (Ciara Shimidzu in interim)	Information Management Team (H&F)
			Create a list of staff who haven't signed the PCS/completed the training to date, broken down by service, circulated to the Service Management Teams for actioning and a procedure to follow		To be recruited	H&F Service Teams
	2	"The completion of mandatory data protection induction training (including the signing of the Personal Commitment Statement), in relation to both the requirements of the Act and the data controller's policies concerning the use of personal data, is appropriately enforced in respect of all employees including temporary and contract employees. Completion of such training shall be recorded."	Align the learning and development outputs with those achieved by Adult Social Care and Children's Services as part of their Information Governance Programme	In Progress	To be recruited (Ciara Shimidzu in interim)	Tri Borough Information Governance and Caldicott Support
			Use existing H&F PCS		To be recruited	Information Management Team (H&F)
			Signed PCS' to be held by the service and logged manually by a dedicated officer		To be recruited	H&F Service Teams
			The service to monitor completion and report to the ICO Undertaking Lead Officer who will then report to H&F Business Board monthly		To be recruited	H&F Service Teams
			Use WCC's e-learning platform to deliver the data protection module	In Progress	To be recruited (Ciara Shimidzu in interim)	H&F Service Teams
			Regular reports to be run from the WCC e-learning platform, monitored by the service and reported to the ICO Undertaking Lead Officer who will then report to H&F Business Board monthly		To be recruited	H&F Service Teams

	3	"The data controller shall, by 1 December 2015, set up a refresher programme to ensure that data protection training shall be updated and refreshed at regular intervals, not exceeding 2 Years. However, the data controller should also identify and formally document the training requirements of	To be incorporated into Phase 2 below			
	4	"The data controller should ensure that attendance at data protection training sessions is monitored and that appropriate	See 2 above			
	5	"The data controller shall implement such other security measures as it deems appropriate to ensure that personal data is protected against unauthorised and unlawful processing, accidental loss, destruction, and/or damage"	A three Council wide staff awareness and communications plan targeting key data protection and information security messages initially and then aligned to Phase 2 below	In Progress	Ciara Shimidzu	Communications Team
			Completion of Phase 2 - see 7 below			
<b>Phase 2: The Long Term Approach (H&amp;F, RBKC and WCC)</b> Shared Services IM Strategy - Learning and Development workstream, data protection  <b>Objective:</b> Embed data protection principles into staff behaviour, operational and strategic work, thereby ensuring compliance with ICO Undertaking across all three Councils	6	Agree a strategy with Human Resources and Organisational Development	Build data protection into the corporate induction programme across the three Councils	In Progress	Head of IM	Debbie Morris
			Develop e-learning programme of bite-size modules using training skills analysis to date (with IM)	In Progress	To be recruited (Ciara Shimidzu in	HR/OD
			Develop a refresher programme		To be recruited	HR/OD
			Agree a three Council PCS or equivalent	In Progress	To be recruited (Ciara Shimidzu in	Shared ICT Services
			Develop a three Council monitoring procedure using Net Consent and Agresso	In Progress	To be recruited (Ciara Shimidzu in interim)	MSP and Shared ICT Services - Information Security
	7	Implement a three Council IM staff awareness and communications plan		In Progress	Head of IM	Communications Team