

DATA PROTECTION / GDPR COMPLIANCE AUDIT BY RGDP

STATUS - for noting

1. You will recall that we appointed the local consultants RGDP as our Data Protection Officer (DPO) for the next 12 months. This service includes an initial audit then monthly ½-day visits by their skilled staff member.
2. The audit is a 24 page document and the Summary of non-compliant items is attached. The full audit is very thorough and comprehensive and identifies a range of items to address. There is an action plan which has been received since this report was issued, and this is a 'living' spreadsheet document that is updated as various actions are progressed.
3. As stated previously, although the DPO is primarily in relation to personal data, there is a large overlap in respect of the Freedom of Information (Scotland) Act [FOISA] and Environmental Information regulations. From 11 November 2019 we have to comply with the FOI legislation (we already need to comply with the EI regs).
4. RGDP have been very helpful to us in the preparation for the start of FOISA. They have also issued to their clients lots of pro forma letters, templates and other material to help everyone get up to speed and to a good standard.
5. Lister now has much of its FOISA material on the web already, but no doubt more will need to be uploaded in due course.
6. We shall continue to get good value from the RGDP consultancy as we take forward the actions in the plan.
7. You will see on the agenda, several updated or new policies which I have done as part of this general FOISA and GDPR work.

Alistair Cant
DIRECTOR
18 October 2019
Ref: