

| Stage     | Date                 | Data Management<br>(Operations, to include Tech) | Complete | Date                 | Business Improvement<br>(Governance) | Complete     |
|-----------|----------------------|--|----------|----------------------|--------------------------------------|--------------|
| Stage One | January – March 2017 | Training and Education                           |          | January – March 2017 | Policies                             |              |
|           |                      |  | ✓        |                      |                                      | ✓            |
|           |                      |  | ✓        |                      |                                      | ✓            |
|           |                      |  | ✓        |                      |                                      | ✓            |
| Stage Two | March – June 2017    | Data Identification                              |          | March – June 2017    | Publication                          |              |
|           |                      |  | ✓        |                      |                                      | ✓            |
|           |                      |  | ✓        |                      |                                      | Under review |
|           |                      |  |          |                      |                                      | ✓            |

|  |  |  |  |   |  |   |
|--|--|--|--|---|--|---|
|  |  |  |  | <ul style="list-style-type: none"> <li>June 2017</li> </ul> | impact and draft policies <ul style="list-style-type: none"> <li>Identify template letters and documents on UPM to be amended and commence work to amend.</li> </ul> | ✓ |
|  |  |  |  | <ul style="list-style-type: none"> <li>June 2017</li> </ul> | <ul style="list-style-type: none"> <li>Liaise with WCC IG team on progress</li> </ul>  | ✓ |

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|-------------|---------------------------|--|---------------------|---|--|--|
| Stage Three | June 2017 – November 2017 | Data Discovery <ul style="list-style-type: none"> <li>For each process, identifying what information/data we actually hold,</li> <li>Identifying where we hold additional information</li> <li>Identifying any missing data</li> </ul> | ✓<br><br>✓<br><br>✓ | June 2017 – November 2017 <ul style="list-style-type: none"> <li>MYR July 2017</li> </ul> | Informing Public <ul style="list-style-type: none"> <li>Draft Fair Processing Notice</li> <li>Conduct privacy impact assessments on each process</li> <li>Update employers on action taken by the</li> </ul> | ✓<br><br>In progress with Data Angels<br><br>✓ |

|            |                               |  |  |   |   |                   |
|------------|-------------------------------|--|--|---|---|-------------------|
|            |                               |  |  | <ul style="list-style-type: none"> <li>• June 2017 &amp; October 2017</li> <li>• November 2017</li> </ul>                           | <p>Fund (2016 AGM follow up)</p> <ul style="list-style-type: none"> <li>• Seek assurances from third party contractors on actions they are taking</li> <li>• Liaise with WCC IG team on progress</li> </ul>   | <p>✓</p> <p>✓</p> |
| Stage Four | November 2017 – February 2018 | <p>Data Retention</p> <ul style="list-style-type: none"> <li>• Set retention periods for each piece of data</li> <li>• Destroy and clean data</li> </ul> | <p>✓<br/>Agreed no retention periods</p> <p>Ongoing work as part of Data Quality</p> | <p>November 2017 – February 2018</p> <ul style="list-style-type: none"> <li>• AGM November 2017</li> <li>• December 2017</li> </ul> | <p>Educating Employers</p> <ul style="list-style-type: none"> <li>• Reminders in employer briefing note to be ready for GDPR</li> <li>• Template policies written by LGPS Funds with LGA for review with view to publishing as examples to all Funds</li> </ul> | <p>✓</p> <p>✓</p> |

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|------------|---|---|----------|--|--|----------|
| Stage Five | February 2018 –<br>April 2018<br><br>• February<br>2018 | Implementation and<br>Education<br><br>• Staff Briefing<br>(Bespoke training for<br>individual sections<br>e.g. Customer<br>Services/frontline<br>officers) |          | Final actions<br><br>• February 2018<br><br><br><br>• March 2018 &<br>every year<br>thereafter | Monitoring Performance<br><br>• Review and publish<br>new policies on website<br>and update Information<br>Governance Section<br>with GDPR.<br><br>• Obtain assurance of<br>third parties on data<br>management including<br>issuing new Data<br>Sharing Agreement |          |
|            |   |   |          |  |  |          |

| Policies to be drafted/incorporated  | Status   |
|--|--|
| <ul style="list-style-type: none"><li>• Data Retention policy</li><li>• Data Portability</li><li>• Transfer of data</li><li>• Consent</li><li>• Right to rectification</li><li>• Right to be forgotten</li><li>• Process maps to show use of data for all fund processes</li><li>• International members</li><li>• Privacy impact assessments for all fund processes</li></ul> | <ul style="list-style-type: none"><li>• Drafted and published as part of Fair Processing Notice on website <a href="http://www.wmpfonline.com/fairprocessingnotice">www.wmpfonline.com/fairprocessingnotice</a></li><li>• Drafted and published as part of Fair Processing Notice on website <a href="http://www.wmpfonline.com/fairprocessingnotice">www.wmpfonline.com/fairprocessingnotice</a></li><li>• Drafted and published as part of Fair Processing Notice on website <a href="http://www.wmpfonline.com/fairprocessingnotice">www.wmpfonline.com/fairprocessingnotice</a></li><li>• Confirmed consent not required due to legal duty on LGPS</li><li>• Drafted and published as part of Fair Processing Notice on website <a href="http://www.wmpfonline.com/fairprocessingnotice">www.wmpfonline.com/fairprocessingnotice</a></li><li>• Drafted and published as part of Fair Processing Notice on website <a href="http://www.wmpfonline.com/fairprocessingnotice">www.wmpfonline.com/fairprocessingnotice</a></li><li>• Work started on these, <a href="http://www.wmpfonline.com/datamaps">www.wmpfonline.com/datamaps</a></li><li>• To be drafted once individual member state individualities known</li><li>• Commenced to be completed by 31 March 2018</li></ul> |

|   |   |
|---|---|
| <ul style="list-style-type: none"> <li>• Annual data cleanse/review</li> <li>• Transparency (how we use your data) policy</li> <li>• Children's transparency policy</li> </ul>  | <ul style="list-style-type: none"> <li>• To be included as part of monthly submissions and Data Team business as usual</li> <li>• Drafted and published as part of Fair Processing Notice on website <a href="http://www.wmpfonline.com/fairprocessingnotice">www.wmpfonline.com/fairprocessingnotice</a></li> </ul>  |
| <b>Policies to be reviewed</b>  |   |
| <ul style="list-style-type: none"> <li>• GDPR Policy</li> <li>• Subject access requests</li> <li>• Data sharing agreement</li> <li>• Third party contracts</li> <li>• Reporting Data breaches</li> <li>• Privacy notices</li> <li>• Cyber Security Policy</li> <li>• Records Management Policy</li> </ul> | <ul style="list-style-type: none"> <li>• Drafted (attached)</li> <li>• Policy included in GDPR policy (attached)</li> <li>• Working with CWC procurement team to review and draft</li> <li>• To be reviewed with LGA template</li> <li>• Completed and included in GDPR policy</li> <li>• Completed and included in GDPR policy as well as published separately on Fund website <a href="http://www.wmpfonline.com/privacynotice">www.wmpfonline.com/privacynotice</a></li> <li>• First draft written and with the Fund's Systems and Business IT Manager for review</li> <li>• Being drafted with CWC IG Team to ensure consistency (not yet available)</li> </ul> |