



## **Surrey Firefighters Local Pension Board 29 March 2018**

### **Preparing for General Data Protection Regulations (GDPR)**

#### **Recommendations:**

The Board is asked to **note** the content of this report and make recommendations if any further action is required.

#### **Background**

1. The Pension Board are aware of the new data protection regulations due to come into force in May 2018. This report summarises progress to date and highlights future areas of activity in Pensions Administration to ensure compliance of the new legislation.

#### **Workstream Summary**

1. As this new legislation affects all aspects of Orbis operations, a County wide steering group, led by the Information Manager, has been established to plan and prepare using an action plan. This plan is also being used across the Orbis partnership and with other partner organisations such as Health and Police. **Annex 1** provides an overview of progress as at January 2018.

#### **UK Data Protection Bill**

2. A Bill looking to replace the current Data Protection Act (1998) is currently being considered by parliament. This Bill includes GDPR, specific derogations within GDPR and the Law Enforcement Directive. The SCC GDPR Action Plan is being updated to ensure the Council is able to respond to the wider legislation (it is not currently clear when this legislation will come into force).

## Pensions Administration activity

3. The action plan has a number of key workstreams which can be summarised below along with the current position and actions which directly affect pensions administration activity.
4. **Maintain Records of Data Processing** SCC has an Information Asset Register (inc Pensions data) that will be used for this purpose. A dedicated resource is being employed to update it and add relevant information required under GDPR.
5. **Data Security Measures** = a systems gap analysis (inc Pension Scheme systems/doc storage) is being undertaken across Orbis. A Risk assessment on the pensions administration system Altair (including the online portal) is being carried out by IT&D.
6. **Update Service Provider Contracts** Orbis Public Law and Orbis Procurement have introduced new procurement processes and contract T&Cs. Existing contracts will be subject to variation - letters being prepared and disseminated on behalf of SCC.
7. **Revise and Update Privacy Notices and Consider Whether Member Consent Is Required** Pensions: consent will not be widely relied on - alternative legal conditions for processing have been identified. Where consent is used (in niche cases) explicit consent will be obtained and recorded.
8. **Breach management process** - already in place
9. **Privacy Impact Assessment** -Pensions PIA in progress, currently identified areas of focus:  
ACTION 1: Privacy Notice; Employers have to inform employees that they will be automatically enrolled. The pensions team will be required to send out a notice - this advises what information we collect and why and can be provided as a link to the website. A general statement is being prepared by the Pensions Team. A link to this Notice will also be included in standard correspondence to existing members.  
  
ACTION 2: Data storage limitation vs data minimisation – examine possible ways to filter records if required.  
  
ACTION 3: Risk assessment on Altair is currently being carried out by IT&D.

## Summary

10. The Board is asked to note the update provided and to advise if any further reporting will assist the Board in providing assurance on GDPR compliance.

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**Sources/background papers:** Annex 1 – Progress Dashboard