**COM042 – OGG Proposal**

**Problem Statement**

The General Data Protection Regulation (GDPR) is an EU regulation by which the European Parliament, the Council of the European Union and the European Commission intend to strengthen and unify data protection for all individuals within the European Union.   The new legislation came into force on 25 May 2018. Aligned to this across Applications Services there were a number of requirements to be met prior to the new legislation coming into force.

COM042 GDPR Preparation for Applications project provided support for the work required across Application Services to ensure compliance with the legislation. The project delivered:

* Internal register for Apps Services
* Assessment of  services which required privacy notices (and progressed publication of these)
* Evaluation of other work required for Apps owned services for May 2018 and beyond
* Recommendations for Apps Services Privacy Impact Assessments
* Evaluation of working practices and recommendations for future work to make changes to these.

The project developed an action plan for colleagues within Apps to work together to ensure compliance with GDPR aligned to the areas identified. These actions have been ongoing throughout the project and will continue beyond the closure of the project, however, there is a need for the project to identify ownership of the action plan prior to closure. It is for this reason the OGG are asked to consider the solution outlined below.

**Proposed Action**

The COM042 Project Team would like to propose that ownership for the action plan is transferred from the project to the OGG. This will ensure ongoing focus on delivery of the longer term actions to meet GDPR across Apps Services whilst benefiting from cross service representation, established group process, and appropriate seniority to enable effective escalation of risks and issues.

Actions within the plan would remain with current owners but progressed would be tracked via the OGG until completion. It is proposed the action plan review is logged within the minutes of the OGG and Alex Carter is assigned the owner (currently Project Sponsor for the COM042 project).

**Stakeholders**

The stakeholders for the project will need to be consulted on this. These include:

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| --- | --- |
| [Alex Carter](https://www.projects.ed.ac.uk/unpublished/project/com042/stakeholders/alex-carter)  | IS Apps - Service Management  |
| [Alistair Fenemore](https://www.projects.ed.ac.uk/unpublished/project/com042/stakeholders/alistair-fenemore)  | Information Services CISO  |
| [Bill Lee](https://www.projects.ed.ac.uk/unpublished/project/com042/stakeholders/bill-lee)  | Development  |
| [Mark Ritchie](https://www.projects.ed.ac.uk/unpublished/project/com042/stakeholders/mark-ritchie)  | ISG Applications Division (Apps)  |
| [Rhian Davies](https://www.projects.ed.ac.uk/unpublished/project/com042/stakeholders/rhian-davies)  | PMO  |
| [Renate Gertz](https://www.projects.ed.ac.uk/unpublished/project/com042/stakeholders/renate-gertz) | DPO |
| [Catherine Hetherington](https://www.projects.ed.ac.uk/unpublished/project/com042/stakeholders/catherine-hetherington)  | Service Management  |
| [Dawn Dodds](https://www.projects.ed.ac.uk/unpublished/project/com042/stakeholders/dawn-dodds)  | Service Management  |
|  |  |
| [Susan Cooke](https://www.projects.ed.ac.uk/unpublished/project/com042/stakeholders/susan-cooke)  | Service Management  |
| David Watters | IS Apps - Project Services  |

**Estimated Effort**

The IS effort to undertake the move of responsibility is expected to be minimal and be included within expected COM042 closure budget and as part of OGG normal effort.

**Responsibilities**

As outlined above actions would remain with current owners and overall lead for the roll out would remain with Alex Carter.

**Target Date**

It is expected if this proposal is approved at the OGG on 18th July the responsibility will transfer with immediate effect.

Expected implementation of the actions within the plan are outlined against each action along with ownership.

If the proposal is expected the project will be enable to progress closure, expected to be within w/c 23/07/18.

**Further Information**

[COM042 GDPR Readiness SharePoint (Action Plan)](https://uoe.sharepoint.com/%3Ax%3A/r/sites/is-apps/service/Shared%20Documents/COM042%20GDPR%20Readiness/COM042%20GDPR%20Action%20Plan.xlsx?d=wa7b07b8cc3ad4c99822921f4dbbe90fb&csf=1&e=QRHwqs)

COM042 [GDPR Readiness for Applications Division Services](https://www.projects.ed.ac.uk/project/com042) Project Page