

Data Protection - Outline of Likely Compliance Regime & ER Actions Necessary

Following initial training on data protection [] and meetings with the Nations & Regions representatives on the IPC (Information Policy and Compliance) team it would appear that, as expected, Data Protection compliance and processes will be the subject of significantly increased focus in the coming months.

There will be a requirement for training along the lines of the Fair Trading and Legal Modules with a sign-off on a regular basis to confirm divisional compliance with processes, procedures and training statistics based on a requirement for 95% of identified staff to have up to date training.

The precise roles requiring training have yet to be identified but on the audience front, the focus appears to be on those who carry out research. Given that journalists carry out the role of researcher in regional news services there is a risk that the numbers requiring training could be very significant. We have indicated that this may well be inappropriate (and suggested the provision of a short checklist/comms plans in lieu of training) but we are unlikely to get any further detail on this until roles in News have been assessed and a recommendation made.

Key Requirements *Note that these requirements are still being established.*

- Data lifecycle maps to be completed by end of August
- Named reps at each station/region with responsibility for compliance and local processes – required by September
- Senior managers and nominated reps to receive face to face training
- On-line module to be launched for identified staff role – 4th Qtr 08
- Divisional Rep [] to act as co-ordinator for station reps and to take overall responsibility for compliance with policy including formal regular sign off. First sign off quarter will be June-September 08 but full compliance with training statistics is not expected.
- An *Ariel* and *gateway* communication process will begin imminently focusing initially on data security including password protection, email etc. It is likely we will be expected to back this up with our own comms.
- Encryption is likely to be required for data used off site with specially procured encrypted USB memory sticks obtained. Laptop and Blackberry/PDA security guidelines will follow
- Data distribution methods to be reinforced (WinZip and passwords for email data)

ER Recommendations

1) [] and [] to begin **immediate research/ data gathering exercise** on sample radio stations and TV services to establish data lifecycle maps and risks - to complete by end August

Sites selected – Bristol (TV, Weeklies, Radio) Birmingham (Radio, staff data, Newsletters), Coventry (Radio, Open Centre). Radio will be sampled on all three sites to assess variation in the use of phone in systems etc.

Findings of data cycle mapping and risks will be reviewed by IPC during September and any changes to processes and procedure communicated to regions from mid-September (with any urgent changes prior to that). This may involve taking the guidelines and writing a bespoke version for ER teams to encapsulate some of our unique issues such as the use of phone in databases.

2) A **presentation to ERMM** by senior staff from the IPC team at September's ERMM – max 1 hour

3) HRLPs to **identify regional reps** by mid -September at latest and to consider whether single rep for region is appropriate or reps at each station

4. Regional Reps to have **face to face training by end September**

5. **Online modules** to begin from October to train all other identified staff

6. View to be taken on how to communicate/roll out new **physical data security measures** such as encrypted USBs when this becomes clearer at a corporate level.