

GDPR Compliance Programme: Programme management support

Purpose of this briefing note

To outline a proposal (developed in conjunction with the Business Change Team of TfL PMO and the HR Graduate) for resourcing the high-level programme management requirements of TfL's GDPR Compliance Programme. The proposal does not address local project management resourcing requirements within individual business areas such as Technology & Data, HR, Surface Service Operations and Enforcement and On-Street Operations.

Background and context

From 25 May 2018, TfL and its subsidiaries will be required to comply with the General Data Protection Regulation (GDPR). While many of the main provisions and principles of the GDPR are consistent with the Data Protection Act, the GDPR also introduces several new concepts and:

- strengthens the rights of individual data subjects
- increases obligations on data controllers and their data processors
- places additional restrictions on data controllers' processing of personal data
- has a significantly enhanced enforcement regime, through a new power for the Information Commissioner to impose monetary penalties of up to 4% of annual turnover for certain breaches of the GDPR

To achieve compliance with the GDPR by 25 May 2017 TfL and its subsidiaries (including London Transport Museum and the TfL/Tube Lines Pension Funds) will need to implement a number of changes to systems and business processes associated with the processing of personal data.

The identification and successful implementation of the various changes involved in this programme of work will require a series of local delivery projects co-ordinated and supported by the Privacy and Data Protection Team. The most important of these delivery projects are likely to be focussed on (and resourced by) the following areas of the business which carry out the most complex or extensive processing of personal data:

- Technology & Data
- Commercial
- HR and Pensions



- Occupational Health
- Surface Service Operations (includes TPH, Cycle Hire and Road User Charging)
- Enforcement and On-Street Operations
- LU Revenue Control and LU Network Security
- London Transport Museum

As that team currently lacks appropriate programme/project management expertise it will need to be sourced from elsewhere within the business.

Proposed GDPR Compliance Programme work streams

The following workstreams of the GDPR Compliance Programme have been identified (although this list is not exhaustive) and in many cases these will cut across the delivery projects outlined above:

- personal data mapping (to capture and document details of the processing of personal data (including the legal basis for processing) across every area of the TfL group and its key data processors)
- a review and update of TfL's Privacy and Data Protection Policy and the TfL Policy on the Sharing of Personal Data with the Police and other SLEAs
- updates to the TfL Management System (content within the TfL Management System will need to be reviewed and updated)
- a review of functionality within systems used to process personal data to ensure they can support TfL's response to data subjects attempting to exercise their rights under the GDPR (eg to suspend or cease processing) and to ensure retention periods are being properly applied to personal data
- a review of the security of systems used to process personal data including access controls and user activity logs
- identification and capture of privacy and data protection risks (in local risk registers, or in ARM using a new risk category will need to be created within ARM)
- data processor contract variations (between 400 and 700 data processor agreements with external service providers will need to be amended (some service providers are likely to want to negotiate some amendments to the proposed clauses))
- updates to privacy notice and supporting website content (TfL currently uses more than 30 different Privacy Notices across its services and operations, supported by seventeen online privacy pages published on the TfL website and all of this content will need to be reviewed and updated)
- a review of data processing consent mechanisms and associated record keeping
- updates to Subject Access Request forms/processes (TfL currently has eleven Subject Access Request forms/processes)

- establishing a rolling programme of annual “Data Protection Compliance Assessments” to monitor compliance and capture changes to existing data processing activities (using the TRUSTe Assessment Manager tool which will also be used to carry out Data Protection Impact Assessments for new projects)
- updates to Information Sharing Protocols and Procedures (10 Information Sharing Protocols and approximately 20 associated Information Sharing Procedures governing the sharing/transfer of personal data with other public authorities will need to be reviewed and updated, this process is likely to involve negotiations with those partner organisations).
- a series of new Information Sharing Procedures (under existing Information Sharing Protocols) to be drafted and signed
- eLearning content within the mandatory “My role in privacy and data protection” course will need to be reviewed and updated; new eLearning modules may need to be developed for specific topics, eg de-personalisation/anonymisation of personal data; profiling; processing personal data associated with children; etc)
- awareness campaigns and training (a general internal awareness campaign needs to be planned and implemented with the assistance of Employee Communications & Engagement with targeted training for certain key business areas, eg those processing subject access requests or likely to receive requests from data subjects to cease/suspend processing)
- review of HR Policies and employment contract terms and conditions

It is anticipated that this programme of work will take at least twelve months to plan and complete.

Proposed resourcing arrangements

Following discussions with the Business Change Team of TfL PMO and the Graduate Scheme Team of HR, the following resourcing proposal has been identified:

1. a Project Manager, to be seconded from TfL PMO (Job Description attached as Appendix I of this paper) to the role of “GDPR Programme Manager” within the Privacy and Data Protection Team for a period of twelve months; this embedded approach is consistent with an ExCo decision of 8 March to embed change project management resource into business areas rather than maintain a pan-TfL service
2. a number of consecutive “Graduate GDPR Project Manager” placements each lasting between three and six months, to be resourced through the TfL Graduate Scheme (which includes a significant number of graduates with project management experience gained through involvement with engineering and major projects)

The Graduate Project Managers would be supervised by the GDPR Programme Manager for the duration of their placements.

The core purpose of the two project management roles is to co-ordinate the overall programme, working closely with members of the Privacy Team and local GDPR project teams. Key tasks will include:

- helping to define key tasks and track their delivery against agreed timescales
- create and maintain a consolidated GDPR Compliance Programme risk register
- providing periodic progress reports and management information to key stakeholders
- providing support and guidance to local project teams to ensure a consistent and co-ordinated approach across the business
- ensuring that appropriate SME input (from the Privacy and Data Protection Team and other specialist business functions) is obtained where necessary/appropriate
- supporting the creation and operation of a Programme Steering Group (ie arranging meetings, preparing associated reports/presentations and capturing details of decisions)
- establishing a network of GDPR change champions across the business and helping to develop the existing network of Personal Data Custodians (60 senior managers accountable for privacy and data protection compliance within their business areas)
- developing and managing a training and communications plan (working closely with Learning & Development, Employee Communications & Engagement and other relevant stakeholders)
- maintaining effective and positive working relationships with local project management teams, Steering Group members and other stakeholders for the duration of the programme

Associated costs

TfL PMO has provided the following estimate for the cost of an experienced Band 3 Project Manager over a 12 month period:

- an annual salary of £50,000 to £55,000
- a total cost of approximately £85,000 to £95,000 over 12 months (including all on-costs, pension contributions, NI, etc)

There are no direct costs associated with a graduate trainee placement; these are covered in full from the central graduate scheme budget managed by HR.

It may be necessary to resource the provision of a RAS token, an iPad and/or Blackberry device if the individuals do not already have access to those items.

Suitable office accommodation has already been identified for the GDPR Programme Manager and Graduate GDPR Project Manager on floor 7 of Palestra; where they would

occupy two workstations immediately adjacent to IG colleagues from the TfL Management System Team.

Next steps

1. Identify a source of funding to cover the cost of a twelve month secondment for a Band 3 Project Manager from TfL PMO
2. Engage with TfL PMO and their HR/Transformation key contacts to pursue the option of a temporary headcount transfer to the Privacy and Data Protection Team
3. Identify a suitable candidate from within TfL PMO for the role of GDPR Programme Manager. Liaise with GC and PMO SAP Gatekeepers to arrange a reporting line change within SAP for that individual and their SAP Position
4. Advertise for a Graduate GDPR Project Manager on the TfL Graduate Jobs Board and liaise with the HR Graduate Scheme Team to identify and place a suitable candidate within the Privacy and Data Protection Team

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APPENDIX I

TfL PMO Band 3 Project Manager Job Description





Transport for London

Role Description

Role Title	Project Manager
Reporting to	Senior Project Manager
Hay score / Pay band	Band 3 - 571
Role Scope	The Project Manager is responsible for management of assigned projects (typically affecting a significant part of the organisation and with a value under £10m value) to meet the needs of its customers.
Key Accountabilities	<ol style="list-style-type: none">1. Manage assigned projects, in accordance with the TfL PPM Methodology and working to relevant corporate standards, to ensure delivery of intended business benefits.2. Provide direction and supervision to assigned project staff in accomplishing agreed project objectives.3. Establish and maintain an effective working relationship with Project Sponsor, End User (s), and suppliers' and contractors' project management teams as appropriate to facilitate the smooth running of the project to deliver the intended business benefits. Within agreed authority levels, negotiate, procure and authorise all major project contracts and variations and approve and authorise all payment to meet value for money criteria.4. Consult and engage the services of specialist corporate Support Services to negotiate and/or administer as appropriate project agreements with trades unions and outside parties.5. Manage communication plan, and working with Corporate Communications ensure regular communication with all internal and external stakeholders as appropriate6. Management of staff: undertaking all relevant line management activities (e.g. performance management and review, attendance management); providing leadership, advice and support to direct reports; develop individuals and staff to establish a highly performing team and therefore the successful delivery of TfL's performance objectives; ensuring promotion of equality in all people related practices and equal opportunity for all employees, providing an inclusive working environment.
Key interfaces	<ol style="list-style-type: none">1. Project Sponsors: Regular contact throughout the project lifecycle, including: agreeing scope, reviewing benefits and business case, conducting assurance reviews, managing risk, reporting on progress and agreeing resolution / escalation of issues, and acceptance of project completion.2. End-Users and Customers: Regular contact throughout the project lifecycle, including: understanding and agreeing requirements, appropriate consultation through project, managing impact of change and implementation into operation3. Suppliers and Contractors: Regular contact throughout the project lifecycle, including: briefings, appropriate contact during procurement, day-to-day management to deliver project, resolution of issues, sign-off of deliverables

The role description describes the main elements of the role. However the role holder may be required to carry out additional activities at the request of the line manager

	<p>4. Corporate Support functions (Commercial, Legal, HR, ER, Finance, IM): involvement as appropriate to deliver the projects, including , seeking expert advice at outset and throughout project, agreeing scope of inputs to project and resources, managing inputs as part of project.</p>
Knowledge	<p>1. Knowledge of change management tools and techniques</p> <p>2. Holds a recognised project management qualification (APM Professional or equivalent)</p> <p>3. Desirable: Knowledge of TfL's project management methodology</p> <p>4. Desirable: Understanding of TfL's operational business issues, procedures and priorities and ER interfaces</p> <p>5. Desirable: Degree, or equivalent qualification in relevant subject, for example, business, IT, engineering</p> <p>6. Desirable: Awareness of safety issues in an operating railway environment</p>
Skills	<p>1. Ability to analyse complex data, draw conclusions, produce reports and make recommendations to senior management.</p> <p>2. Ability to communicate effectively, both orally and in writing, with people at all levels across the organisation and externally.</p> <p>3. Ability to build effective working relationships, with people at all levels across the organisation and externally and to influence.</p> <p>4. Ability to manage multidisciplinary teams to deliver effective performance.</p> <p>5. Ability to identify and articulate in a compelling way the need for change</p> <p>6. Ability to manage complex change projects, in a complex organisation, successfully to achieve business benefits</p>
Experience	<p>1. Experience of personal responsibility for managing projects, including:</p> <ul style="list-style-type: none"> - managing project finance and programme assurance and control. - managing the contractual aspects and obligations of projects - managing people as direct reports. - building relationships with, and influencing, a range of people at all levels within and outside the organisation <p>2. Experience of handling change effectively and positively</p> <p>3. Experience of successfully identifying and implementing changes to improve working practices</p> <p>4. Desirable: Experience of working in project management in a large, complex, safety focussed and regulated organisation(s), where there are multiple complex interfaces, and delivering to time budget and quality</p> <p>5. Desirable: Experience of working in an operational, customer service or people focused environment</p> <p>6. Desirable: Experience of working in a construction or engineering environment</p>

The role description describes the main elements of the role. However the role holder may be required to carry out additional activities at the request of the line manager

HEALTH & SAFETY STATEMENT All employees have a general duty in law to take reasonable care for the health and safety of themselves and of other persons who may be affected by their acts or omissions. All employees must understand and be committed to Transport for London's Health and Safety Policy statement and the Company's safety priorities and be aware of their contribution to such priorities. All employees must also be aware of and comply with all current health and safety legislation and other Company requirements that are relevant to their role.

Note: Accountable and specialist safety related roles will require an additional detailed statement.

EQUALITY STATEMENT Transport for London values the diversity which exists in our city, and our aspiration is to reflect this diversity in our workforce. All employees must be aware of and committed to the Equality Policy Statement of Transport for London. All employees must also be aware of and comply with other Company requirements associated with Equality and Diversity issues relevant to their role.

Note: Accountable and specialist E&I roles will require an additional detailed statement

CRIME and DISORDER STATEMENT It is a statutory requirement for all departments in TfL to follow Section 17 of the Crime and Disorder Act 1998. Section 17 requires authorities to consider the likely affect on crime and disorder and community safety in all that they do, and take action to prevent crime and disorder, substance misuse, anti-social behaviour and behaviour that adversely affects the environment. TfL has voluntarily been committed to following Section 17 since 2006, but we must all make sure that it is considered in decision making, policies and procedures in the same way that equality and health and safety are.

The role description describes the main elements of the role. However the role holder may be required to carry out additional activities at the request of the line manager