

# GDPR Statement of Intent

Document Control  
Reference: GDPR  
Issue No: 1  
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## Introduction

This statement sets out Cox & Co. Payroll Solutions Ltd.'s proposed approach to ensure the business is compliant, secure and has effective systems in place to meet the GDPR regulatory changes in May 2018

## Existing Data Protection Policy

The existing Cox & Co. Data Protection policy will continue to underpin the basis of compliance during the GDPR project timeline. All practices and processes will remain effective until they are replaced by revised policies and procedures.

The existing Data Protection policy, procedures and documentation in situ meet upcoming GDPR requirements and regulations.

## Changes to current Data Protection Policy

To ensure continued compliance policies and procedures will be revised as part of our embedded security by design approach.

### 1. GDPR Project Plan: Issued 13<sup>th</sup> July 2017

The framework of the GDPR project is set to ensure that Cox & Co. adheres to the new regulations by 1<sup>st</sup> January 2018. In addition to this itinerary, planned improvements have been scheduled.

### 2. GDPR implementation and system change timeline

In July 2017, we completed our GDPR Data Impact Assessment and Data Asset Register/Risk Assessment.

The findings of this assessment identified improvements than could be made to aid both client (Data Controller) and Cox & Co. (Data Processor) to improve security further.

These will be:

- Encrypted email
- Password protected documentation
- Implementation of two-factor authentication on Client Portal
- Data exchange via Client Portal only

### 3. Timeline of Improvement Measures

Subject	Description	Action required	Implementation from
Data Impact Assessment	GDPR Project commenced		July 2017
Policy review	Policy written	GDPR Statement of Intent	July 2017
Policy review	Policy written	Fair Processing Notice	July 2017
Policy review	Policy written	Retention of Records	July 2017
Policy review	Policy written	Access Control	July 2017
Communication	Communicate to clients GDPR Statement of Intent	Statement of intent published and issued	9 <sup>th</sup> October 2017

Email	Encrypted email exchange	MS 365 exchange upgrade	30 <sup>th</sup> October 2017
Email	Encrypted email exchange	Formal notice provided to clients	6 <sup>th</sup> November 2017
Email	Password protect attached payroll documents	Formal notice provided to clients	6 <sup>th</sup> November 2017
Client Hub	Sharepoint migration	In-house software Training (1 <sup>st</sup> )	24 <sup>th</sup> October 2017
Client Hub	Sharepoint migration	In-house software Training (2 <sup>nd</sup> )	TBC
Email	Encrypted email exchange	Enforce exchange using encryption	1 <sup>st</sup> January 2018
Email	Password protect attached payroll documents	Enforce password protection on all document exchanges	1 <sup>st</sup> January 2018
Client Hub	Sharepoint migration	Project commence	1 <sup>st</sup> January 2018
Client Hub	Two Factor Authentication	Testing	5 <sup>th</sup> February 2018
Client Hub	Sharepoint migration	Formal notice provided to clients/training	30 <sup>th</sup> March 2018
Client Hub	Sharepoint migration	Migration complete	30 <sup>th</sup> March 2018
Client Hub	Sharepoint migration	Helpdesk & support	30 <sup>th</sup> March 2018
GDPR Project complete			30 <sup>th</sup> March 2018

#### 4. Document Owner and Approval

The Data Protection Officer/GDPR Owner is the owner of this document and is responsible for ensuring that this procedure is reviewed in line with the review requirements of the GDPR. A current version of this document is available to members of Cox & Co. Payroll Solutions Ltd staff, and employees of the businesses that it is contracted to for outsourced payroll services by emailing [enquiries@payrollsolutionsltd.co.uk](mailto:enquiries@payrollsolutionsltd.co.uk)

This procedure was approved by the Director (Stephen Cox) of Cox & Co. Payroll Solutions Ltd and is issued on a version controlled basis under his signature.

Signature:

Date:

#### Change History Record

Issue	Description of Change	Approval	Date of Issue
1	Initial issue	Steve Cox	19/09/17