

Bradford District Prevent Plan 2022-24

Activities	Lead Officer/Organisations	Expected Milestone/Outcomes	Performance Measure	CTLP Priorities	Completion Of Actions
1. EFFECTIVE LEADERSHIP					
1.1 Review CONTEST Governance arrangements and ensure effective linkage to relevant District Partnerships and Strategies.	CONTEST partners	<p>Strengthen CONTEST performance management to ensure effective leadership is provided to partners</p> <p>Membership and terms of reference are appropriate and effective.</p> <p>Partnership groups are aligning national policies with local delivery plan.</p> <p>Effective leadership arrangements that build resilience to the influence of terrorist narratives in the district.</p> <p>Mechanisms to ensure that Prevent Plan progress is regularly reviewed in CONTEST meetings.</p>	<p>Full recorded partnership buy-in into delivery groups</p> <p>Four CONTEST and twelve Channel meetings per year</p> <p>LA CONTEST meetings 4 times a year to review progress against Prevent Plan</p> <p>Terms of reference reviewed and updated where appropriate</p>	Links to all priorities to have effective governance arrangements and to link in to district partnerships and strategies	<p>All meetings completed by March 2023 and again by March 2024.</p> <p>Terms of reference reviewed at CONTEST Q4 2023 and 2024.</p>
1.2 Lead the risk assessment process and ensure partners are fully sighted on key risk issues	West Yorkshire Police and CBMDC Prevent.	<p>An annual CTLP is produced that partners feed into and are consulted about.</p> <p>Quarterly updates are also produced and communicated to all partners via CONTEST.</p> <p>CTLP is for West Yorkshire but each area has own plan that is RAG rated.</p> <p>Partnership actions respond directly to current risk.</p> <p>Response to changes in risk are fluent and prompt via established networks.</p>	<p>The CTLP is used to shape the District Prevent Plan and referred to throughout.</p> <p>The CTLP also reflects Prevent delivery, training and projects.</p> <p>Threat and risk briefings are provided to partners on a quarterly basis.</p> <p>Local threat picture is referred to in all Prevent training.</p> <p>Prevent self-assessment audits are provided to partners.</p>	Links in to all CTLP priorities to ensure that everyone is fully aware of risk.	<p>CTLP is provided by CTU at start of 2023 and 2024.</p> <p>Prevent bid for the District is submitted in January 2023 and January 2024.</p> <p>Progress towards the bids above is reported every</p>

			Progress on these is reported at quarterly CONTEST meetings.		Q at LA CONTEST.
1.3 Prevent is accountable to local democratic processes – formal reports made to elected members through Corporate Overview and Scrutiny Committee	CBMDC	<p>Transparency and accountability is supported through the existing democratic processes</p> <p>Elected members understand the Prevent agenda. They also engage with it, attend Prevent related training for elected members and support Prevent related delivery in their local areas.</p>	<p>Attend one O/S committee per year and provide an updated report on Prevent work in the past year.</p> <p>Deliver at least two members’ training sessions per year addressing relevant Prevent related topics of the moment.</p> <p>Elected members are invited to Prevent events in their areas and attend if possible.</p> <p>Quarterly updates on Prevent work are provided for elected members.</p> <p>A Prevent training session is offered to all newly elected members once taking on their role.</p>	Links to all CTLP priorities	<p>O and S meeting March 2023 and March 2024.</p> <p>2 delivered each year – dates to be confirmed nearer the time.</p> <p>Prevent events dates decided nearer the time.</p> <p>Q updates are provided at same time as CONTEST updates.</p> <p>After May elections. Dates decided after consultation with elected member training department.</p>
1.4 Partnership and Safeguarding Boards are regularly updated on threat and risk and ensure Prevent safeguarding processes are built	CBMDC- Safeguarding Adults and Children Board and Safer Communities Partnership Board	The Safeguarding Board role is integrated into Prevent delivery so that Prevents’ role in protecting vulnerable people is widely recognised as a ‘safeguarding’ function.	<p>Agenda itemised for Prevent on partnership Boards and/or briefing provided every quarter.</p> <p>Boards deliver Prevent related initiatives within their work programme</p>	Links to all CTLP priorities	<p>At quarterly Safeguarding Board briefings every quarter.</p> <p>Prevent related sessions are offered every</p>

<p>into existing district policies and programmes</p>			<p>and this is updated every year.</p> <p>The role of Prevent as a Safeguarding function is built into all safeguarding information.</p> <p>A Prevent training session is offered to all as part of Safeguarding Week at CBMDC.</p> <p>Representatives from Children's and Adults Safeguarding are members of the Channel Safeguarding Panel and attend regularly.</p>		<p>safeguarding week which occurs every year at the Council.</p>
<p>1.5 Review of Channel processes to ensure systems are fluent and support is appropriate and effective</p>	<p>CBMDC</p>	<p>Regular training and support for Channel members linked to relevant local and national/ international risks. Updated Terms of Reference and review of action plan. Review of membership to ensure that the correct people are part of the Panel. Ensure a Chair and Vice Chair are in place and of sufficient authority to ensure swift action when necessary. Independent Channel audit process undertaken. Channel assurance document completed for Home Office every year. 12 pre Channel meetings to ensure Channel meetings flow smoothly and everything necessary is provided.</p>	<p>Completed training for members every quarter. An action plan is in place to respond to any recommendations made and agreed at Contest or as a response to Channel Assurance Document or Channel audit. Channel referrals. Good representation and attendance at Channel meetings. Channel referrals shared in Pre Channel and with PEO to ensure no unconscious bias.</p>	<p>Links to all CTLP priorities</p>	<p>Channel meetings occur every month, as do pre meetings. Channel training is offered every quarter. Channel assurance document completed by 12th April 2022. Channel audit will be completed by April 2023</p>
<p>1.6 Education Leaders across Early Years, Schools, Further and Higher education are</p>	<p>CBMDC- Prevent Education Officer</p>	<p>Young people recognise divisive extreme narratives and have the knowledge and skills to build resilience against hate based groups and individuals. They are also aware of how groups use contemporary issues to</p>	<p>A dedicated Prevent Education Officer for the District offers help and support to schools, pupils, staff and parents. This ranges from</p>	<p>Links to all CTLP priorities, especially those risks particularly targeted towards the</p>	<p>. PEO programme of work is offered in PEO newsletter every quarter.</p>

<p>supported to deliver appropriate anti-extremism education</p>		<p>manipulate individuals and gain support via mis/dis/mal information and conspiracy theories.</p> <p>Teaching and support staff recognise risks and understand reporting arrangements and their responsibilities regarding Prevent delivery and reporting.</p> <p>Schools share their experience and knowledge with each other to build capacity within the education sector.</p> <p>Parents and carers understand the risks in our society of young people being manipulated by groups and individuals who believe in divisive, extremist narratives. They are aware of how to get help and support with this.</p>	<p>individual sessions to project work in schools.</p> <p>The Education Officer creates audits, newsletters and up to date information and resources to support schools in their Prevent responsibilities.</p> <p>The Education Officer continues to build the Prevent Champions network so that it has members across the district in all education sectors.</p> <p>At least one Prevent Education Champions event is held every year to share good practise across the education sector and forge links between schools, building capacity in Prevent related education.</p> <p>The PEO attends Head Teacher Partnership Groups and DSL network meetings to ensure Prevent is high on their agenda and give risk/training updates.</p>	<p>young, such as online safety, links to conspiracy theories and gaming.</p>	<p>At least one Prevent Champion event in 2022/23 and 2023/24.</p> <p>Head Teacher and DSL network training occurs every quarter.</p>
<p>1.7 Prevent Champions across the Local Authority and District are supported to embed Prevent into the</p>	<p>CBMDC</p>	<p>All areas across the LA and District that may have a link to Prevent are fully informed about risks, training and support available and referral structures.</p>	<p>At least one Prevent Champions event for the LA and District will be undertaken every year and representatives will</p>	<p>All CTLP risks will be addressed but there may be specific areas where the risk</p>	<p>At least 2 Prevent Champion events will happen 2022-</p>

work that they do across Bradford.			<p>be in attendance from across the district.</p> <p>The Prevent Champions Network will be used to share relevant Prevent information on risks, training and support. It will also be used to pass on the training via peer to peer working.</p> <p>The Prevent Engagement Officer will share materials to help train and inform each area of current Prevent risks. They will give advice, support and training according to need in each area and support each Prevent Champion to do the same.</p>	of a specific kind of radicalisation is particularly high. E.g. Football/ sporting clubs and ERW extremism. All risks will be considered in terms of the audience.	24.
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2. SAFEGUARDING					
2.1 Clear reporting/ responsibility arrangements to Adult and Children's Safeguarding Boards	CBMDC/ West Yorkshire Police	<p>Safeguarding boards are clear as to their role and responsibilities in Prevent delivery.</p> <p>Safeguarding Boards have integrated Prevent into their core functions and programmes.</p>	<p>Identified in West Yorkshire Safeguarding Procedures.</p> <p>Deliver Prevent sessions as part of Safeguarding Week content every year.</p>	Links to all CTLP priorities	By end of 2022/3 and end of 2023/4

			<p>Adults and Children's safeguarding has members in the Prevent Champion's Network.</p> <p>Prevent related training is delivered every year to Adult's and Children's Safeguarding staff.</p>		
2.2 Current generic Safeguarding packages include recognising radicalisation and hate narratives as standard	CBMDC	Wider recognition of Prevent as a safeguarding role and where this sits alongside other safeguarding risks	Prevent safeguarding training is mandatory across LA staff training.	Links to all CTLP priorities	By end of 2022/3 and end of 2023/4
2.3 Trigger plans are in place to manage the range of circumstances in which any returnees from a conflict zone may arrive in the District, so that children can be safeguarded.	CBMDC/West Yorkshire Police	<p>Forward planning mitigates risk and ensures children are catered for in the most sensitive and effective way.</p> <p>The risk of extremism and radicalisation locally from returnees is understood, reduced and support plans are in place</p>	<p>An action plan that utilises local safeguarding procedures is in place.</p> <p>This is plan is ongoing and updated as required.</p>	Links to CTLP priority regarding Syrian returnees and putting plans in place to deal with this, should it happen	Already completed. This will be amended if events should make it necessary.
2.4 Support the effective and efficient delivery of the Channel support scheme.	CBMDC/ West Yorkshire Police	<p>An effective and efficient Channel process with a broad range of partners who can meet the needs of those at risk within our district.</p> <p>Support to ensure that those partners are well briefed on current risk and Prevent- related issues.</p> <p>In built review of good practise.</p>	<p>12 Channel safeguarding panels per year.</p> <p>12 Pre Channel meetings every year to ensure that the main meetings go smoothly.</p> <p>Yearly review of Channel/Prevent safeguarding processes.</p> <p>Recorded broad Channel membership across all sectors.</p> <p>Record of review of previous good practise and a 'lessons learned' template for all cases leaving Channel.</p> <p>Channel audit to be</p>	Links to all CTLP priorities	<p>Channel meetings and pre meetings completed every month.</p> <p>Review of process done by March 2023 ns 2024.</p> <p>Audit completed by March 2023</p> <p>'Lesson's learned' every month</p>

			completed.		
2.5 Referrals to Channel are appropriate and proportional and submitted across a range of sectors	CBMDC	<p>Greater confidence in the Channel process.</p> <p>Risk is managed effectively and referrals are signposted correctly.</p>	<p>An increased number of referrals are heard at Channel Safeguarding Panel from a variety of areas.</p> <p>Tracking of referrals shows representation across sectors.</p> <p>Monthly review of referrals that don't make Channel to ensure there is no unconscious bias.</p>	Links to all CTLP priorities	Monthly reviews occur every month
2.6 Increased support to mental health sector to recognise and respond to issue of radicalisation and hate narratives	CBMDC	<p>Greater understanding and support for those with mental health issues who become vulnerable to an extremist hate narrative</p> <p>A Mental Health practitioner attends Channel Panel meetings.</p> <p>More knowledge, awareness and support for those working with people with mental health concerns</p>	<p>Increase in links with the mental health support hub for advice and support.</p> <p>Deliver well attended Prevent training sessions for mental health professionals around current Prevent issues and the links to mental health.</p>	Links to CTLP- Mental health risks	<p>Training for mental health professionals at least once every year and more as required.</p> <p>Training for additional needs professionals at least once every year and more as required.</p>
2.7 Increased support to those with additional needs that may make them vulnerable to radicalisation and hate narratives.	CBMDC	<p>Greater understanding and support for those with additional needs who may be vulnerable to extremism</p> <p>An additional needs practitioner attends Channel Panel meetings.</p> <p>More knowledge, awareness and support for those working with people with additional needs</p>	<p>Increased links with additional needs staff in LA.</p> <p>Deliver well attended Prevent training sessions for additional needs staff around current Prevent issues and the links to additional needs.</p>	Links to CTLP- additional needs risks, particularly associated with online extremism.	<p>Training for additional needs professionals at least once every year and more as required.</p> <p>Training for DV professionals at</p>

<p>2.8 Increased support for those involved in areas that crossover with radicalisation. These can include areas such as Domestic Violence.</p>	<p>CBMDC</p>	<p>Greater understanding of the links between DV and radicalisation.</p> <p>A member of the DV team attends Channel Panel meetings as and when necessary.</p> <p>More knowledge, awareness and support for those working in the DV team around the links between extremism and DV.</p>	<p>Increased links with DV Team staff.</p> <p>Deliver well attended Prevent training sessions for DV Team staff around current Prevent issues and the links to additional needs.</p>	<p>Links to all CTLP priorities</p>	<p>least once every year and more as required.</p>
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3. ENGAGEMENT / RAISING AWARENESS					
<p>3.1 CBMDC Prevent Team to be a point of contact for support and advice to all sectors and agencies to deliver to district Prevent objectives and meet requirements of the Prevent Duty</p>	<p>CBMDC</p>	<p>Support is available and accessible to all. All sectors know where to get support from.</p>	<p>‘Prevent Champion’ network grows in membership across all sectors.</p> <p>There are quarterly Prevent Champion information events concerning the latest Prevent guidance and information.</p> <p>A regularly updated Prevent webpage with useful, up to date information.</p> <p>Termly newsletter for schools and circulation of relevant guidance documents to all sectors.</p> <p>Prevent Champions information sent out on a quarterly basis.</p> <p>Elected member updated sent out on a quarterly basis.</p>	<p>This will link to all CTLP priorities as it will ensure that all sectors and agencies have a point of contact to receive information and training on risk across the district.</p>	<p>Events every quarter for the network.</p> <p>Quarterly updates for the network and elected members and termly newsletter for schools.</p>
<p>3.2 Build engagement,</p>	<p>CBMDC</p>	<p>Empowered</p>	<p>Deliver Prevent awareness</p>	<p>Links to all CTLP</p>	<p>PAG is bi annual</p>

<p>consult and raise awareness with communities on Prevent project delivery. Support and nurture community based solutions</p>		<p>communities identifying appropriate solutions that will be effective at ground level</p>	<p>training, relevant to communities, to every constituency in Bradford.</p> <p>Wherever possible, ensure that projects used in Prevent work are grassroots, local projects.</p> <p>Set up a Prevent Advisory Group and meet bi annually to consult around Prevent related issues.</p>	<p>priorities and makes sure that all areas of the district are consulted and made aware of risk areas within the district.</p>	<p>Training is delivered across every constituency by the end of each year.</p>
<p>3.3 Run a series of 'Prevent Roundtables' for community audiences who wish to find out more and contribute to Prevent delivery</p>	<p>CBMDC</p>	<p>Trust and confidence is increased in local Prevent delivery</p>	<p>Five area based community roundtables per year and include local elected members</p>	<p>Links to all CTLP priorities and ensures that members of the public are consulted about future planning.</p>	<p>All roundtables completed at end of each year</p>
<p>3.4 Develop a 'Community Engagement Strategy' to engage with groups and individuals who wish for dialogue around Prevent and related subjects</p>	<p>CBMDC</p>	<p>Any concerns from communities are taken into account. Communities understand how work to challenge extremist hate narratives is delivered. Prevent is understood better and misconceptions are minimised.</p>	<p>Create a Prevent Advisory Group who meet on a bi-annual basis and consult them on matters related to Prevent in our District</p> <p>Create a 'libraries roadshow' to publicise Prevent related work across the District.</p> <p>Create an OOSS Prevent Champions network and also an event to publicise within this setting.</p> <p>Publicise the strategy on a dedicated Prevent webpage.</p> <p>Strategy includes numbers of people positively engaged in Prevent.</p> <p>Ensure Ward Officers are</p>	<p>Links to all CTLP priorities, particularly helping to raise awareness of risk amongst the local community.</p>	<p>Strategy completed and events all undertaken and completed every year.</p>

			consulted and fully informed about events in different areas.		
3.5 Develop a network of operational Prevent leads across the District and provide a training and support programme	CBMDC/ West Yorkshire Police	More effective information and communication systems – earlier and more effective detection of vulnerability	<p>Annual event and training for operational Prevent leads</p> <p>Health, local authority, police, education and probation represented in Prevent Champions Network, as well as community groups and third sector representatives.</p> <p>Online signposting and guidance</p> <p>Create opportunities for Prevent Champions to cascade their knowledge to others in their sectors. Plan events in education, Police and health.</p>	Links to all CTLP priorities and provides a mechanism whereby these can be disseminated throughout the district, via Prevent Champions.	<p>. Prevent training offered in Safeguarding week for all partners.</p> <p>Prevent Champions event every year with up to date training and speakers.</p> <p>Prevent Champions Education event every year.</p> <p>TTT for education and other partners as part of Prevent Champions resources every year.</p>
3.6 Engage young people to educate and support challenge of extremist hate narratives	CBMDC	<p>Young people are more resilient to hate narratives and able to challenge them.</p> <p>Young people are able to cascade their knowledge and build Prevent related capacity within the education system</p>	<p>At least one project every year to focus on young people and any related Prevent risk.</p> <p>Develop peer champions in all Prevent Champion schools. Organise an event each year for peer champions to share good practise across the district and learn new things to disseminate at school.</p> <p>Deliver Prevent related sessions as needed, to match risk analysis according to Prevent referral data. Offer these to youth groups, sports and social groups, religious groups within the district</p>	Particularly focuses on CTLP risks that involve young people such as the online threat and single issues risks that are exacerbated by use of the online space, such as left wing/ anarchist viewpoints.	<p>Prevent Champions event every year.</p> <p>Peer Champions in all schools by end of 2024.</p> <p>Young person's panel by end of 2024.</p>

			Create a young person's panel to test drive new resources/ projects and ensure they are fit for purpose.		
3.7 Develop and deliver in partnership with the third sector a range of projects that meet local Prevent Objectives	CBMDC	Risks and vulnerabilities are reduced against identified threat	Independent Prevent projects delivered across sectors and across the District according to need. Need evidenced in application process.	Addresses all CTLP risk.	
3.8 Review arrangements for use of Council facilities to ensure that venues are not being used to promote hatred or extremist viewpoints	CBMDC	Prevent / Safeguarding leads are assured that proportionate arrangements are in place to prevent the organisations resources from being used to support those who to promote hatred or extremist viewpoints	Review takes place and guidance produced Monitoring arrangements are established and operational	Addresses ALM, Far Right and Extreme Right, Left Wing/ Anarchist and single issues threats. Any groups that would use a venue to speak to an audience rather than just relying on the online space.	Policies are currently in place. But these will be reviewed every year and update as necessary.
3.9 Update and distribute guidance to Mosques and Islamic institutions should they be contacted by a far right/ extremist group	CBMDC	Increased confidence from communities that they are being protected from extremists and that they have the most up to date guidance and information.	Update is created, taking into account all the latest advice and information. Distribute update to all District Islamic Institutions and Mosques	Addresses CTLP risk from Far and Extreme Right wing groups.	Update every year
3.10 Ensure organisations and statutory partners hosting external speakers are aware of responsibilities to have robust equal opportunities policies which challenge hate speech, racism and homophobia	CBMDC/West Yorkshire Police	Bradford District is an increasingly difficult place for extremist speakers to deliver speeches / lectures	External speaker policy disseminated to all statutory partners. On-line support and guidance is available and advertised for all venues in the district. Organisations are approached if external speakers of concern are using venues and a plan is followed to offer support and guidance.	Addresses ALM, Far Right and Extreme Right, Left Wing/ Anarchist and single issues threats. Any groups that would use a venue to speak to an audience rather than just relying on the online space.	Document is already created but is updated every year as necessary.

3.11 Work with those who are supporting refugees and asylum seekers so that they are aware of the risks to these communities from extremist groups and can provide help and support here necessary.	CBMDC	Make it very difficult for those wishing to exploit asylum seekers and refugees for extremist purposes.	<p>Ensure all those who work with asylum seekers and refugees are Prevent trained and know of the help and support available and how to access it.</p> <p>Ensure those who are refugees and asylum seekers have the necessary information to recognise if someone is trying to radicalise them and where to go for help if necessary.</p>	Addresses extremist groups who target refugees and asylum seekers to be members. Also addresses those groups who target refugees and asylum seekers as being the causes of problems.	Workers and service users given training every year
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4. TRAINING/ COMMUNICATIONS					
4.1 Continue to support a network of Prevent trainers across the District to deliver quality and appropriate safeguarding training	CBMDC	Appropriate training leads to good delivery of safeguarding and education work to undermine extremist hate narratives	Prevent TTT is undertaken every quarter so that all organisations have the opportunity to have one person qualified to deliver appropriate Prevent training to staff. Trainers are recorded and sent updates on key Prevent issues and developments.	All CTLP priorities will be addressed in the training as they will be used to inform on risk.	Training delivered every quarter.
4.2 Create an updated Prevent Communications Strategy	CBMDC	Increase transparency around Prevent delivery and help build trust and confidence in the agenda.	Strategy approved by CONTEST	All CTLP priorities addressed.	Completed but options to update every year.
4.3 Updated training programme for Prevent/CONTEST	CBMDC	Operational and Strategic Leads understand risk and	An updated menu of rewritten Prevent training to be circulated across the district,	All CTLP priorities will be addressed in the training as they	.Menu and accreditation package completed

groups and operational Prevent leads across the District, incorporating key current issues and risks. .		vulnerabilities and are equipped with knowledge/skills to make effective decisions	including online and face to face training. All relevant new issues and risks will be covered according to CTLP. Create an updated Prevent Champions accreditation package. An up to date spreadsheet of partners/ champions/ groups who need training and the details to ensure that this is regularly done.	will be used to inform on risk.	by end of this year and updated for 2023/24
4.4 Training and engagement for key Council political groups	CBMDC	Local political awareness and buy-in	At least one member's training session per year, according to need. Training is also offered as part of the newly elected member's training package and roadshow.	All CTLP priorities will be addressed in the training as they will be used to inform on risk.	New member training offered post-election period each year and once a year to all elected members.
4.5 Provide Prevent briefings to local authority Tier 4 Managers	CBMDC	Increased referrals to Channel from Local Authority	2 sessions for Tier 4 Managers	All CTLP priorities will be addressed in the training as they will be used to inform on risk.	2 per year.
4.6 Support organisations with IT equipment available to the general public to consider using filtering solutions that limit access to terrorist and extremist material.	BMDC/West Yorkshire Police	Increased difficulty in accessing extremist material at public access points	Update and issue guidance according to most recent information.	All CTLP priorities will be addressed in the training as they will be used to inform on risk.- particularly the online risk.	Completed every year

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5. ON-LINE RESILIENCE					
5.1 Engage a range of partners to consider the nature of the on-line threat and develop a plan that tackles the key threats around online radicalisation.	CBMDC	As a district we are focusing more resource to online threat and are agile to its quickly evolving nature	Consult with partners every quarter to ensure that new and emerging threats are considered and discussed and new dangers shared. Create an online site where help, support and resources can be stored and publicise it amongst all our partners.	Particularly focuses on the online risk and how different groups manipulate the online space for their benefit.	Online site created by 2023/24
5.2 Education programme to explore propaganda, conspiracy theories and develop critical thinking in the district.	CBMDC and project providers	As a district, our community becomes more aware and resilient to propaganda, conspiracy theories and develops their critical thinking skills, so they are less likely to be susceptible to online extremism.	Sessions delivered to elected members, parents, young people and members of the community.	Particularly focuses on the online risk and how different groups manipulate the online space for their own benefit.	Plan written and updated every year.

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6. Organisation					
6.1 Map out areas in the district to make planning project work and training delivery more effective	CBMDC	Our delivery will be more impactful as it targets areas of most need.	Data collected from partners to help with this. Updated and changed on a quarterly basis. Used to plan training and project work in the future.	Addresses all CTLP areas of risk	Consultations happen every quarter
6.2 Organise all Prevent related materials and store older materials safely	CBMDC	Materials will be easy to find and safely stored for any future use.	Materials are password protected and organised for easy access by the Prevent team. A review of all materials conducted and those older than 6 years of no use will be destroyed according to GDPR rules.	Addresses all CTLP areas of risk.	GDPR Administration Plan to be completed by 2024.