

Blewbury Parish Council GDPR Data Audit 2018

1. Background and relevance

The Office of the Information Commissioner expects data controllers to be compliant before 25th May 2018.

This Act replaces the Data Protection Act 1998.

The Act applies to 'personal data' that is data relating to a living person who can be identified from that data.

'Processing data' means any operation performed on that personal data such as collection, recording and use.

The PC does have data that relates to living individuals and does process data.

Information Audit

The type of information the Council holds tends to be limited to name, address, telephone number and email address.

More detailed information is held for employees & councillors, (eg staff employment details & contracts, councillors' election registration forms & Registers of Interests – these Registers are published in full on the Vale of White Horse DC website).

In the normal course of business the Parish Council will receive personal data in connection with the following:

- Administration of the allotments – tenants' details held by Allotments Cttee
- Administration of the cemetery & churchyard – next of kin & other family details
- Administration of the recreation ground and village hall – user groups
- Administration of employment matters – data shared with HMRC
- Correspondence sent to the Council – email, telephone, letter
- Contact details for local organisations – data shared with webmaster, editor
- Contact details for user groups eg for recreation ground and village hall hire
- Contact details and information relevant to Leases and user agreements – data shared with council solicitor, sometimes Land Registry
- Information supplied for the council website
- Information supplied for inclusion in the Blewbury Bulletin and/or website

Data relating to professional or business details in connection with the following:

- Auditing – data shared with external & internal auditors
- Insurance
- Contact details & business information from suppliers & contractors

Note: the Data Protection Act does not apply to the records of those who are interred at the cemetery.

The Council is sometimes sent a copy of the electoral roll with updates through the year. The Data Protection issues associated with the electoral roll are the responsibility of Vale of White Horse DC. The Council does not permit any third party to view the document.

Services relating to children – the Council does not have any services directly relating to children. It is aware that should that circumstance change, the relevant Data Protection issues will need to be taken into consideration.

2. Sensitive data

The Act requires 'sensitive data' to be treated differently. Categories of sensitive data include racial or ethnic origins, political opinions, religious beliefs, sexual orientation and health issues.

The Parish Council does not collect such data.

Where the Council carries out village wide surveys, such as in the Neighbourhood Plan or a Parish Plan, the responses are anonymous and questions are not generally asked on a topic that is classified as sensitive.

3. Storage of data

All council paper documents are stored in locked cabinets in the scout hut.

All computer records are stored on a password protected laptop with anti-virus software. The Parish Council uses password protected cloud storage for a back up copy.

4. How the data is used

Data is only used for the purpose it has been supplied.

Data is not passed onto a third party without the express consent of the data subject.

The Council does not routinely share data.

The council does not sell data.

5. Subject access requests

A request for a copy of information held can be made.

There is a prescribed process. Response time will reduce to one month under the new GDPR.

6. Data Protection Officer

A DPO may need to be appointed but this is currently under review.

Actions taken or still required

Clerk to check on any regulations covering access to/retention of data by webmaster & access to/retention of data by Blewbury Bulletin editor.

Council will need to begin keeping a record of data processing activities.

Clerk to check the council's lawful basis for processing data.

The Council will need to review policies for

- Data Protection/Privacy
- Data Subject Access & Subject Access Requests
- Data Retention & Disposal
- Data Sharing
- Data Breach Policies
- Cybersecurity checks
- Data Privacy Notices
- Data Privacy Impact Assessments
- Consent forms