

Great Notley Parish Council Data Audit

- A. This Audit is to assist the Parish Council in complying with its record keeping obligations under the GDPR.
- B. This questionnaire is designed to help the Parish Council to audit their personal data. It is important that councillors and staff complete this form as comprehensively as possible. The purpose of a data audit is to find out what data the council is processing, what it is used for, where it is located and who has access to it. It is an important step in assessing whether there are any risks in the type of processing the council carries out. For example, if the council processes a large amount of sensitive personal data but has no access controls in place restricting who can see or use the data, that is a security risk which needs to be fixed. Without carrying out an audit a council may not know what risks it currently has with data.
- C. The generic phrase "council" has been used to refer to the data controller (see glossary below) using the questionnaire.
- D. Glossary
 - **"Personal Data"** is any information about a living person which can identify them. This is not just someone's name and address but any information which can identify them (directly or indirectly). For example a phone number or email address is personal data. Any other contact information or a person's employment history, or credit history are all personal data.
 - **"Data controller"** is the person or organisation who determines the how and what of data processing.
 - **"Data processor"** is the person or firm that processes the data on behalf of the controller.
 - **"Data subject"** is the person about whom personal data is processed.
 - **"Processing"** personal data means storing or deleting any personal data on a computer, database or some manual files (e.g. HR, allotment tenancy files or invoices with contractor payment details). The word 'processing' also covers selecting a name for a mailing list, or reading it off a screen during a call. It includes transferring and altering data. Indeed, practically anything done to personal data constitutes processing.
 - **"Sensitive personal data or special categories of personal data"** are any of the following types of personal data about a data subject: racial or ethnic origin; political opinions; religious beliefs; trade union membership; physical or mental health or condition; sexual life or orientation; genetic data; and biometric data.

Part A: YOUR INFORMATION		
1.	1. Person completing questionnaire a) Name. b) Role. c) Telephone number. d) Email.	a) Suzanne Walker b) Clerk c) 01376 331251 d) greatnotleyclerk@gmail.com
2.	Data controller (e.g. name of local council or parish meeting)	Great Notley Parish Council
3.	Date you completed this questionnaire	13/1/23
Part B: COMMUNICATING PERSONAL DATA		
4.	<p>This section relates to communications with councillors, staff and local residents (including mailing lists) general public.</p> <p><u>a) What type of personal data does the council keep?</u> e.g. name, contact details such as bank details.</p> <p><u>b) Where does the council get the personal data from?</u> e.g. staff, residents, other local authorities, charities and sports clubs, community groups, recruitment agencies.</p>	<p>a) Type of personal data Names, addresses, phone no. email addresses, bank details, NI no. DOB, payroll and pension information, personnel records, medical information in case of sick leave, information from DVLA in relation to legal requirements to drive van and to insure the drivers of the van</p> <p>b) Where does the council get the personal data from Employees, Councillors, other local authorities, DVLA, employees medical practitioner residents, contractors, magazine advertisers, local community groups, community volunteers and Tree Warden and those on allotment waiting list</p>

	<p>c) Why <u>does the council</u> collect or process the data – what does the council do with the personal data?</p> <p>For purposes relating to: e.g. local resident concerns, management of council facilities, services and staff, contract management, performance of statutory functions. [Please list all reasons].</p> <p><u>d) Who does the council disclose personal data to?</u></p> <p>E.g. the public, councillors, staff and contractors carrying out the work of the council, pension providers, HMRC, credit reference agencies, recruitment agencies, prospective employers</p>	<p>c) Why does the council collect/process the data and what does it do with it.</p> <p>Employees – legal obligation in complying with taxation requirements of HMRC and Pension requirements of LGPS, paying salaries and employment law requirements and legal entitlement to drive van and to make sure van may be insured.</p> <p>Councillors – in performance of statutory functions – certain contact data made available in the public domain and register of interests requires certain data to be disclosed.</p> <p>Contractors, magazine advertisers, local community groups and community volunteers and prospective allotment holders – public interest – public authority carrying out functions and managing assets and producing magazine</p> <p>Residents – responding to questions and concerns raised by residents.</p> <p>d) Who does council disclose personal data to</p> <p>Employees – External payroll provider, HMRC, Essex Pension fund, Parish Council’s bank to effect bank transfers. In the event of a reference request previous, prospective employers, Parish Council’s insurers</p> <p>Councillors – contact information made available on website, in magazine and</p>
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	<p><u>f) Does the council ever send personal data overseas and if so where to and to which organisation? This might include overseas companies providing database or email services.</u> <u>e.g. do any of your suppliers use 'cloud storage' and if so do you know where the personal data is located?</u></p> <p><u>g) Does the council collect any sensitive personal data?</u> see definition above. <u>h) If so for what reason?</u> e.g. for safeguarding compliance; physical or mental health data relating to staff; racial and ethnic origin relating to equal opportunities monitoring. [Please list anything else]</p>	<p>wording in the minutes is limited to the recording of decisions.</p> <p>f) Does the council ever send personal data overseas and if so where to and to which organisation? This might include overseas companies providing database or email services. No. The wordpress website is hosted by Heart Internet which is UK based</p> <p>g) Does the Council collect any sensitive personal data The diversity monitoring questionnaire sent to new employees does not identify the employee. The register of interests does include a request for certain sensitive data such as membership of political parties and Trade Unions – this is permitted under the heading of 'substantial public interest'</p>
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Part C: SUPPLIERS, COMPANIES, AND OTHER ORGANISATIONS THE COUNCIL CONTRACTS WITH	
<p>5.</p> <p>About individuals or representatives of organisations which supply us with services such as for council repairs, or with whom we are in contact</p> <p>a) Who does the council keep personal data about? e.g. tradesman, recruitment agencies, surveyors, architects, builders, suppliers, advisers, payroll processors. [Please list any others]</p> <p><u>b) What type of personal data does the council keep?</u> e.g. name, contact details, qualifications, financial details, details of certificates and diplomas, education and skills. [Please list any others]</p> <p><u>c) Where does the council get the data from? e.g. the individuals, suppliers.</u> [Please list any others]</p> <p><u>d) Why does the council collect or process the data?</u> e.g. council property maintenance and repairs and management of council facilities, pay and manage staff.</p>	<p>a) Who does the Council keep personal data about Tradesman (handyman, grass cutting, builders, electrician) Solicitors, external payroll provider, Surveyors, suppliers including play companies, tool and PPE suppliers, advertisers for magazine</p> <p>b) What type of personal data does the council keep Name, contact details, financial and bank details in order to effect online payment, insurance details to show risk assessed in case of manual contractors.</p> <p>c) Where does the council get the data from From the suppliers or individuals (if sole trader/partnership)</p> <p>d) Why does the council collect/process the data For the proper management of Council</p>

	[Please list any other reasons].	facilities, to acquire supplies to enable the Parish Council to function, to pay and manage staff in accordance with legal requirements.
Part D: GENERAL QUESTIONS ABOUT PERSONAL DATA		
6.	<p>a) How <u>does the council</u> store the personal data collected?</p> <p>b) <u>Does the council</u> take any steps to prevent unauthorised use of or access to personal data or against accidental loss, destruction or damage? If so, what?</p>	<p>a) Data is stored on the Parish Council laptop kept by the Clerk. The laptop is password protected as is the email account. The data is backed up on to Cloud storage which is password protected. The Clerk can access emails from her phone but that device is PIN protected. Hard copy data is kept in a 2-drawer lockable filing cabinet in the Clerk's home office. Archived hard copy data is kept in a four-drawer lockable filing cabinets kept in the Parish Council's secure storage unit</p> <p>b) Laptop password protected as is the Cloud storage. Paperwork kept in secure locked environment. Councillors obliged to sign information security policy</p>

	<p>c) How <u>does the council</u> manage access to data</p> <p>d) What is the process involved in giving access to staff or councillors?</p>	<p>c) Only the Clerk has day to day access to the data. Access to online banking by signatories is individually password protected</p> <p>d) Councillors receive information via email and sign a document to confirm their cyber security.</p>
<p>7.</p>	<p>a) Do any procedures exist for e.g. correcting, deleting, restricting, personal data? If so, please provide details.</p>	<p>When advertisers renew their adverts they are sent a form asking for confirmation of up to date contact information.</p> <p>Those on the allotment waiting list are contacted periodically to make sure information correct</p> <p>Ad hoc reviews of magazine contact information are carried out.</p>
<p>8.</p>	<p>a) Who has access to / is provided with the personal data (internally and externally)?</p> <p>b) Is there an authorisation procedure for accessing personal data? If so, please provide details.</p>	<p>a) The Clerk has day to day access to the data. External payroll provider will deal with payroll issues. The internal and external auditors view financial information. Councillors view certain personal data and signatories have access to online banking</p> <p>b) Laptop password protected. Access to emails password protected. Access to online banking password protected for each individual</p>

9.	Does the council provide a copy of all existing privacy notices?	Yes and available on website as well. The footer on emails and correspondence refers people to it.
10.	So far as the council is aware, has any personal data which was gathered for one purpose been used for another purpose (e.g. communicating council news?) If so, please provide details.	No
11.	Does the council have any policies, processes or procedures to check the accuracy of personal data?	Contained in data protection policy.
12.	a) In the event of a data security breach occurring, does the council have in place processes or procedures to be followed? b) What are these?	Set out in data protection policy
13.	a) If someone asks for a copy of personal data that the council holds about them, i.e. they make a 'subject access request', is there a procedure for handling such a request? b) Is this procedure contained in a written document?	Yes set out in data protection policy
14.	Does the council have an internal record of the consents which the council has relied upon for processing activities? e.g. to send council newsletters to residents	Not applicable as magazine sent out to each and every house in parish and no addressed/names included
15.	a) Are cookies used on our council website?	a) Yes and banner advises of this when entering the site

	<p>b) Does the council provide information about the cookies used and why they are used?</p> <ul style="list-style-type: none"> ▪ <p>c) Does the council keep a record of the consents provided by users to the cookies?</p> <p>d) Does the council allow individuals to refuse to give consent?</p>	<p>b) The wordpress site has a cookie information and consent policy and the ability for users to opt in or out</p> <p>c) Will be maintained by internet hosting company</p> <ul style="list-style-type: none"> ▪ <p>d) Consent may be withheld</p>
16.	Does the council have website privacy notices and privacy policies?	Yes
17.	<p>a) What data protection training do staff (e.g. council administrator, hall bookings secretary) and councillors receive?</p> <p>b) What does the training involve?</p>	<p>Councillors have received briefings at Parish Council meetings and information cards</p> <p>Staff to be reminded of duty of confidentiality</p> <p>Signposted to other sources of training and ICO website</p>
18.	<p>a) Does anyone in the council have responsibility for reviewing personal data for relevance, accuracy and keeping it up to date?</p> <p>b) If so, how regularly are these activities carried out?</p>	In policy
19.	<p>a) What does the council do about archiving, retention or deletion of personal data?</p> <p>b) How long is personal data kept before being destroyed or archived?</p> <p>c) Who authorises destruction and archiving?</p>	Clerk reviews records on an annual basis and will store or destroy data strictly in accordance with document management policy which has been approved by Parish Council and reviewed
Part E MONITORING		
20.	<p>a) Please identify any monitoring of the following systems that takes place. 'Monitoring' includes all monitoring of systems including intercepting, blocking, recording or otherwise accessing systems whether on a full-time or occasional basis. The systems are:</p> <p>(i) computer networks and connections</p> <p>(ii) CCTV and access control systems</p>	<p>The Parish Council laptop is protected by McAfee virus scanner. The Parish Council does not have CCTV or other monitoring devices.</p> <p>The parish Council phone has an answer phone which is reviewed on a daily basis by the Clerk and messages are deleted on at least a weekly</p>

	<p>(iii) communications systems (e.g. intercom, public address systems, radios, walkie-talkies)</p> <p>(iv) remote access systems</p> <p>(v) email and instant messaging systems</p> <p>(vi) telephones, voicemail, mobile phone records</p> <p>[Please list anything else].</p> <p>b) Does the council have notices, policies or procedures relevant to this monitoring?</p>	<p>basis. As the Clerk works in a home officer environment in a separate room no other person can hear the messages.</p> <p>Comments in new data protection policy</p>
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