

1. Background and relevance

The Data Protection Act came into force 25th May 2018 and the Office of the Information Commissioner expected data controllers to be compliant before that date.

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, use.

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

2. Information Audit

The type of information the Council holds tends to be limited to name, address, telephone number and email address. Councillors' election registration forms & Register of Interests –are published in full on the Uttlesford District Council website.

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

- Administration of the recreation ground – health and safety checks
- Administration of employment matters – data shared with HMRC, PAYROLL administer
- Correspondence sent to the Council – email, telephone, letter
- Contact details for local organisations – data shared with webmaster,
- Contact details and information relevant to Leases and user agreements
- Information supplied for the council website

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

- Auditing – data shared with external & internal auditors
- Payroll administrators (outsourced)
- Insurance ~ previously Came & Co now Gallaghers
- Contact details & business information from suppliers & contractors.

The Council may be 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 Uttlesford District Council. The Council shall 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.

3 Sensitive data

The Act requires 'sensitive data' to be treated differently. Categories of sensitive data includes racial or ethnic origins, political opinions, religious beliefs, health issues. The Parish Council does not collect such data. Where the Council might carry out village wide surveys, such as in the Neighbourhood Plan or a Parish Plan, the responses will be anonymous and questions would not generally be asked on a topic that is classified as sensitive.

4. Storage of data

All council paper documents are stored in locked cabinets in the home of the parish Clerk. All computer records are stored on a password protected laptop with anti - virus software. The Parish Council does not currently utilise cloud storage, but utilises Microsoft one drive

5. 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. It does not sell data.

6. 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.

7. Data Protection Officer

The Data Protection Officer is the Clerk

The Council will need to set up

- Data Subject Access & Subject Access Requests forms / Data Retention & Disposal/Data Sharing/Data Breach Policies & cybersecurity checks
- Data Privacy Notice on web site
- Consent forms –
- Written contracts with suppliers Council will need to decide how long to keep key data.

New or replacement policies will be considered as necessary

To note Clerk has carried out a data audit & will continue monitoring of data processing activities.