

# Ainstable Parish Council

## Data Register April 2018

| Data type   | Legal Basis for Processing | Document type    | Held by  | Storage & Disposal   |  |   | Review                 |   |                    | Data in public domain?                              | Risk Assessment of Data Breach |   |   |  |
|---|----------------------------|------------------|--|--|--|---|------------------------|---|--------------------|---|--------------------------------|---|---|--|
|   |                            |                  |  | Storage location   | Duration of storage  | Method of disposal  | Frequency of review    | Method of review  | Risk(s) Identified |   | H/M/L                          | Management/Control of Risk  | Review/Assess/Revise                      |  |
| Councillor's contact details  | Public task                | Electronic       | Clerk  | Clerk laptop, external hard drive  | Indefinitely   | Removal of details on completion of term of office by request.  | Annually               | Councillors to inform Clerk promptly of any changes. Clerk to check annually at the AGM the records held against the declarations of interests. | YES                | Loss/theft of Clerk's laptop or external hard drive | L                              | Laptop is password protected and encrypted. External hard drive is kept at the Clerk's home in a locked cupboard. | Risk is low - current provision adequate. |  |
| Councillor's contact details  | Public task                | Electronic/paper | Other councillors  | Councillors' computers, mobile devices and/or paper records  | Indefinitely   | Removal of details on completion of term of office by request.  | Annually               | Councillors/Clerk to circulate any changes as required.   | YES                | Loss/theft of Councillors' property                 | L                              | Councillors to take all reasonable precautions.   | Risk is low - current provision adequate. |  |
| Councillor's contact details  | Public task                | Electronic/Paper | Parish Council's Banks   | Name and address details of councillors who are signatories to the parish council's bank accounts are held by the council's bankers, as well as copies of identification documents councillors have been asked to provide. The details of incoming/outgoing councillors are provided to Eden District Council as and when there is a change. As a minimum, this would be every four years after an election. |  |   |                        |   | NO                 | Data loss by bank                                   | L                              | Ainstable Parish Council is satisfied by its bank's security arrangements.  | Risk is low - current provision adequate. |  |
| Councillor's contact details  | Public task                | Electronic/Paper | Eden District Council  | Ainstable Parish Council is the Trustee of Ainstable Millennium Green Trust. Name and address details of councillors are therefore provided to the Charity Commission. The parish council will update this information   |  |   |                        |   | YES                | Data loss by Eden District Council                  | L                              | This is unlikely and the data is in the public domain anyway.   | Risk is low - current provision adequate. |  |
| Councillor's contact details  | Public task                | Electronic/Paper | Charity Commission   |  |  |   |                        |   | YES                | Data loss by Charity Commission                     | L                              | This is unlikely and the data is in the public domain anyway.   | Risk is low - current provision adequate. |  |
| Clerk's contact details   | Public task                | Electronic/paper | Chairman   | Chairman's computer, mobile devices and/or paper records   | Indefinitely   | Removal of details on termination of employment, by request.  | Annually               | Clerk to inform Chairman promptly of any changes. Chairman to check records held annually at Clerk's appraisal.                                 | YES                | Loss/theft of Chairman's property                   | L                              | Chairman to take all reasonable precautions   | Risk is low - current provision adequate. |  |
| Clerk's contact details   | Contract                   | NA               | Cumbria Payroll Services   | 18/12/17 - copy of CPSL's data protection policy requested via email   |  |   |                        |   | YES                | Data loss by Cumbria Payroll Services               | L                              | Ainstable Parish Council is satisfied by CPSL's security arrangements.  | Risk is low - current provision adequate. |  |
| Clerk's contact details   | Contract                   | NA               | Parish Council's partners and suppliers, including, but not limited to: CALC; insurers; bench suppliers; playground equipment suppliers; stationery suppliers; maintenance contractors | Ainstable Parish Council will rely on suppliers to comply with GDPR themselves in respect of storage and disposal of this data. In the event of a change of Clerk, the incoming Clerk will be responsible for updating suppliers in a timely manner.   |  |   |                        |   | YES                | Data loss by partners and suppliers                 | L                              | This is unlikely and the data is in the public domain anyway.   | Risk is low - current provision adequate. |  |
| Register of Electors  | Public task                | Electronic       | Clerk  | Clerk laptop, external hard drive  | Indefinitely   | Deletion of out of date files   | Annually               | New files to be requested from EDC annually.  | YES                | Loss/theft of Clerk's laptop or external hard drive | L                              | Laptop is password protected and encrypted. External hard drive is kept at the Clerk's home in a locked cupboard. | Risk is low - current provision adequate. |  |
| Suppliers names & addresses, where supplier is a sole trader working from a home office | Contract                   | Electronic/paper | Clerk  | Clerk laptop, external hard drive, accounting records  | Contact details - Indefinitely<br>Invoices and other financial records - 7 years | After 7 years, financial records to be shredded. Electronic copies of supplier contact details could be deleted on request. | On receipt of invoice. | Clerk to cross check address details held against those on any financial document received.   | YES                | Loss/theft of Clerk's laptop or external hard drive | L                              | Laptop is password protected and encrypted. External hard drive is kept at the Clerk's home in a locked cupboard. | Risk is low - current provision adequate. |  |

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|  |                            |                  |                           | Storage location   | Duration of storage | Method of disposal   | Frequency of review | Method of review  | Risk(s) Identified |   | H/M/L                          | Management/Control of Risk   | Review/Assess/Revise                      |  |
| Grant applications received from individuals applying on behalf of an organisation | Consent                    | Electronic/paper | Clerk                     | Clerk laptop, external hard drive, accounting records if grant awarded | Indefinitely        | NA - the parish council needs to retain applications for historical usage.   | NA                  | NA  | YES                | Loss/theft of Clerk's laptop or external hard drive | L                              | Laptop is password protected and encrypted. External hard drive is kept at the Clerk's home in a locked cupboard.  | Risk is low - current provision adequate. |  |
| Tenancy paperwork  | Contract                   | Electronic/paper | Clerk                     | Clerk laptop, external hard drive, accounting records                  | Indefinitely        | Paper records are shredded after 7 years. Details of the tenancy and rent are retained by the parish council for historical usage.   | Annually            | Clerk to review contact details as part of the annual rent review and signing of the annual tenancy agreement.                    | NO                 | Loss/theft of Clerk's laptop or external hard drive | L                              | Laptop is password protected and encrypted. External hard drive is kept at the Clerk's home in a locked cupboard.  | Risk is low - current provision adequate. |  |
| Correspondence   | Consent                    | Electronic/paper | Clerk                     | Clerk laptop, external hard drive.                                     | Indefinitely        | NA - the parish council retains correspondence and replies for historical usage unless they contain sensitive personal information. Electronic files could be deleted and paper records shredded upon request. | NA                  | NA  | NO                 | Loss/theft of Clerk's laptop or external hard drive | L                              | Laptop is password protected and encrypted. External hard drive is kept at the Clerk's home in a locked cupboard.  | Risk is low - current provision adequate. |  |
| Planning applications  | Consent                    | Electronic/paper | Clerk                     | Clerk laptop, external hard drive.                                     | Indefinitely        | NA - the parish council retains planning applications for historical usage.  | NA                  | NA  | YES                | Loss/theft of Clerk's laptop or external hard drive | L                              | Laptop is password protected and encrypted. External hard drive is kept at the Clerk's home in a locked cupboard. Planning applications are the property of Eden District Council. | Risk is low - current provision adequate. |  |
| Website enquiries  | Consent                    | Electronic       | Clerk/Chairman            | Clerk laptop, external hard drive. Chairman laptop.                    | Indefinitely        | NA - the parish council retains correspondence and replies for historical usage unless they contain sensitive personal information. Electronic files could be deleted upon request.                            | NA                  | NA  | NO                 | Loss/theft of Clerk's laptop or external hard drive | L                              | Laptop is password protected and encrypted. External hard drive is kept at the Clerk's home in a locked cupboard.  | Risk is low - current provision adequate. |  |
| Defibrillator guardian contact details   |                            | NA               | Community Heartbeat Trust | A copy of CHT's data protection policy is held by the parish council   |                     |  |                     |   | NO                 | Data loss by Community Heartbest Trust.             | L                              | Ainstable parish council is satisfied by Community Heartbeat Trust's security arrangements.  | Risk is low - current provision adequate. |  |
| Defibrillator guardian contact details   | Public task                | Electronic/paper | Clerk                     | Clerk laptop, external hard drive                                      | Indefinitely        | NA - details need to be retained for historical usage  | Annually            | Guardians to notify Clerk & CHT promptly of any change. Clerk to confirm annually via email on renewal of CHT adoption agreement. | NO                 | Loss/theft of Clerk's laptop or external hard drive | L                              | Laptop is password protected and encrypted. External hard drive is kept at the Clerk's home in a locked cupboard.  | Risk is low - current provision adequate. |  |

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| Surveys of residents   | Consent                    | Electronic/paper | Clerk                        | Clerk laptop, external hard drive, paper records   | For as long as relevant for the subject matter. | Electronic files to be deleted and paper files shredded. | NA                  | NA               | NO                     | Loss/theft of Clerk's laptop or external hard drive  | L     | Laptop is password protected and encrypted. External hard drive is kept at the Clerk's home in a locked cupboard.  | Risk is low - current provision adequate. |
| Financial records  | Public task                | Paper            | Internal auditor             | Annual financial records are shared with, but not retained by, the internal auditor.       |   |  |                     |                  | YES                    | Deliberate retention of data by internal auditor<br>Loss/theft of paper files from internal auditor's premises | L     | Internal auditor is a reputable person appointed annually by the parish council. Internal auditor to take all reasonable precautions with parish council records.                          | Risk is low - current provision adequate. |
| Financial records  | Public task                | Electronic/paper | Banks                        | Financial information, including bank account details, held by the parish council's banks. |   |  |                     |                  | YES                    | Data loss by bank  | L     | Ainstable Parish Council is satisfied by its bank's security arrangements.   | Risk is low - current provision adequate. |
| Website files  | Contract                   | Electronic       | Website hosting provider     | 16/4 - requested information on data centre from hosting provider                          |   |  |                     |                  | YES                    | Data loss by web hosting provider  | L     | Ainstable Parish Council is satisfied by its web host's security arrangements.   | Risk is low - current provision adequate. |
| Minutes from other government bodies, e.g. EALC, CALC, Cumbria County Council, Eden District Council | Public task                | Electronic/paper | Clerk, Chairman, Councillors | Clerk laptop, external hard drive, paper records   | Indefinitely                                    | NA   | NA                  | NA               | YES                    | Loss/theft of Clerk's laptop or external hard drive<br>Loss/theft of councillor's property                     | L     | Laptop is password protected and encrypted. External hard drive is kept at the Clerk's home in a locked cupboard. Councillors to take all reasonable precautions with parish council data. | Risk is low - current provision adequate. |