

Key: Data in public domain Data NOT in public domain

Data Register September 2019

Data type	Legal Basis for Processing	Document type	Held by	Storage & Disposal			Review			Risk Assessment of Data Breach				
				Storage location	Duration of storage	Method of disposal	Frequency of review	Method of review	Data in public domain?	Risk(s) Identified	H/M/L	Management/Control of Risk	Review/Assess/Revis e	
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 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	Details of incoming/outgoing councillors are provided to Eden District Council as and when there is a change.						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	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 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 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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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 Heartbeat 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 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	Information on hosting provider's data centre security and redundancy available on their website					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 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.