

## 12 STEPS WORK-THROUGH

Update March 2019

### 1. AWARENESS

Yes we are all aware that this is happening

### 2. INFORMATION WE HOLD

WHAT Info	WHO keeps it	WHY is it kept
Email addresses of villagers	All members of PC	Communication
Home addresses of parish councillors	Clerk	Legal requirement
Phone numbers of councillors	All members of PC	Communication
Bank account details of clerk and contractors	Clerk	To pay invoices
Sensitive info (gender, health) of employees	Clerk	Recruitment
Credit information	NONE	
Cemetery Records of deceased	Clerk	Legal requirement
Electoral roll of Fritwell	Clerk	Legal requirement

### 3. COMMUNICATING PRIVACY INFORMATION

Form in PC meetings – to sign or decline every meeting. DONE

Website – data not collected – can make this clearer on front page if required

Email list – need to put paragraph at the bottom with opt-out instructions. DONE

*All councillors to have special email address and to include a disclaimer at end of all outgoing mail – to use same as clerk's.*

Suggested email addresses:

chairfritwellparishcouncil@gmail.com

vicechairfritwellparishcouncil@gmail.com

jofritwellparishcouncil@gmail.com

jasonfritwellparishcouncil@gmail.com

angiefritwellparishcouncil@gmail.com

kathyfritwellparishcouncil@gmail.com

### 4. INDIVIDUALS' RIGHTS

Will be achieved when legal policy document agreed.

Need separate documents for recruitment/tendering and villagers – DRAFTS TO BE REVIEWED BY PC.

5. SUBJECT ACCESS REQUESTS

As above

6. LAWFUL BASIS FOR PROCESSING DATA – ARE WE PROCESSING BY CONSENT?

Yes we are – but will be changing to a consent form for each person rather than a list to make the process more obvious. DRAFTS TO BE REVIEWED BY PC.

7. CONSENT

Explicit, informed, consent to be obtained by form (mentioned above) DRAFTS TO BE REVIEWED BY PC.

8. CHILDREN

N/A (Only have brief data on deceased)

9. DATA BREACHES

Need to add procedure for this to the Subject Access Policy statement

10. DATA PROTECTION BY DESIGN AND DATA IMPACT ASSESSMENTS

N/A for IT systems for us, but worth considering for future policy-making . Eg Tender invitations need GDPR statement to protect contractor's information. *Need also to put in place a check with former contractors/staff if they would like data deleted if we hold it.*

11. DATA PROTECTION OFFICER

The clerk

12. INTERNATIONAL

As above we don't collect personal data from our website but *Data Protection Officer to check website host's policy on collecting IP data.*

NOTES:

Need to make sure sensitive information is properly dealt with in recruitment process.