

## **General Data Protection Regulation - Wem Town Council Information Audit – reviewed October 2021**

### **AIM: This Document is designed:**

1. To be a working document that seeks to identify the data held and/or received by Wem Town Council.
2. Identify potential risks regarding Data breaches.
3. Provide the basis for self-assessment of compliance with the new legislation.
4. Begin identifying actions required to be compliant or mitigate risk.

### Lawful Basis for Holding Data

**(a) Consent:** the individual has given clear consent for you to process their personal data for a specific purpose.

**(b) Contract:** the processing is necessary for a contract you have with the individual, or because they have asked you to take specific steps before entering into a contract.

**(c) Legal obligation:** the processing is necessary for you to comply with the law (not including contractual obligations).

**(d) Vital interests:** the processing is necessary to protect someone's life.

**(e) Public Interest / task:** the processing is necessary for you to perform a task in the public interest or for your official functions, and the task or function has a clear basis in law.

**(f) Legitimate interests:** the processing is necessary for your legitimate interests or the legitimate interests of a third party unless there is a good reason to protect the individual's personal data which overrides those legitimate interests. (This cannot apply if you are a public authority processing data to perform your official tasks.)

<b>SUBJECT</b>	<b>Nature / purpose of processing</b>	<b>Type of Data / where is it from</b>	<b>Format held and how long data held</b>	<b>Who is the Data Subject</b>	<b>Lawful Basis for holding data</b>	<b>Risks and security controls in place</b>
<b>Staff</b>						
Staff personal details	Payroll / HR Functions	Employment contracts	Hard Copy. Electronic files	Staff anyone who has previously	Contract / Public Task/ Legal Obligation	<b>Risk</b> Emails being forwarded to wrong email address

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		Leave/ sickness records Grievance/ discipline Records Accident/ injury record Pension PAYE Bank Details Job applications (successful Unsuccessful		applied for employment		<b>Security Controls</b> Hard copies held in locked filing cabinet Computer records encrypted protected Information retained as per document retention policy Staff Trained in Data Protection Data only shared with Shropshire Council as payroll company, HMRC or external professional advisors documents sent via email password protected Staff consent form distributed May 2018.
Ex staff	In case of claim	Contact details	Hard copy electronic files as per retention policy		Contract / Legal Obligation	<b>Risk</b> - Staff passing on details to councillors outside bodies for non-staffing related matters. <b>Security Controls</b> Hard copies held in locked filing cabinet Computer records encrypted protected Information retained as per document retention policy Staff Trained in Data Protection
<b>Councillors</b>						
Personal Contact Details	Democracy/ HR	Emails, addresses bank details supplied by councillors	Hard Copy. Electronic files	Councillor	Public Task	Contact info a statutory requirement to publicise. <b>Risk</b> - Staff passing on details to people and organisations outside of the council <b>Security Controls</b> Hard copies held in locked cabinet Computer records encrypted protected

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						Information retained as per document retention policy Staff Trained in Data Protection Consent form and privacy policy provided to all councillors May 2018
Declarations of interest	Democracy	Signed form	Hard copy	Councillor	Public Task	See above
Registers of interest	Democracy	Signed form	Hard copy	Councillor and partner	Legislative requirement	See above
<b>Contractors / Suppliers</b>						
Contractors / Suppliers	Dealing with contractors requesting quotes	Contact details Invoices Orders Quotes Bank Details Insurance References	Electronic / Paper Removed as per retention policy r	Contractors / suppliers	Public task	<b>Risk</b> Passing on contact details to those outside the organisation or using it for another purpose <b>Security</b> Addresses not be passed on containing personal data without first seeking the consent.
<b>Residents</b>						
Electoral Roll	In order to identify electors for voting in annual parish meetings	Names of electors and their addresses, marital status From principal authority	Hardcopy. Destroyed once updated copy received	Parish residents	Legal obligation	<b>Risk</b> - Staff passing on details to public, councillors, outside bodies The list should not be photocopied or reproduced in any form. However, anyone can view the list (and indeed write the whole thing down if they so choose) <b>Security</b> Staff trained in data handling Hard copies held in locked filing cabinet.

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Previous Subject Access Request information	Democracy	Name and contact information of requestor	Hard copy / electronic Removed as per retention policy	Complainant	Legal Obligation/ Public task	<b>Risk</b> - Staff passing on details to public, councillors, outside bodies choose) <b>Security</b> Staff trained in data handling Hard copies held in locked filing cabinet. Town Council email provides details of privacy notice
Complaints	Democracy	Name and contact information of complainant	Hard copy / electronic Removed as per retention policy	Complainant	Legal Obligation/ Public task	<b>Risk</b> - Staff passing on details to public, councillors, outside bodies <b>Security</b> Staff trained in data handling Hard copies held in locked filing cabinet. Town Council email provides details of privacy notice
Emails	Dealing with business related matters/ Public enquiries/		electronic			<b>Risk</b> Passing on contact details provided for the sole purpose of addressing a particular issue to those outside the organisation or using it for another purpose. <b>Security</b> Staff trained in data handling in that Emails should not be passed on containing personal data without first seeking the consent of the sender. Staff trained in data handling Computer password protected Town Council email provides details of privacy notice
Previous FOI requests	Democracy	Name and contact	Hard copy / electronic	FOI requestor	Legal Obligation/ Public task	<b>Risk</b> - Staff passing on details to public, councillors, outside bodies

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		information of requestor	Removed as per retention policy			<b>Security</b> Staff trained in data handling Hard copies held in locked filing cabinet.
<b>Community Groups</b>						
Grant applicants	Grant applications	Application forms	Paper copies, destroyed as per data retention policy	Applicants for grants	Public task	<b>Risk</b> - Staff and councillors passing on details to public, outside bodies <b>Security</b> Staff and councillors trained in data handling Hard copies held in locked cabinet. Consent sought before any sharing of information.
<b>Allotments</b>						
	To run the allotments for existing tenants, raise allotment invoices	Name and address/ email/ telephone. Direct from allotment tenants Tenancy agreements	Hard copy. Spreadsheet. Removed as per retention policy	Allotment tenants	Contractual necessity	<b>Risk</b> - Staff passing on details to councillors, outside bodies for non-allotment related matters <b>Security</b> Staff trained in data handling Hard copies held in locked cabinet Computer password protected Privacy notice issued to all tenants March 2018
Would be allotment holders	To maintain a list of applicants	Contact details received direct from allotment applicants	Hard copy. Spreadsheet Removed when offered an allotment	Waiting List applicants	Contract	<b>Risk</b> - Staff passing on details to councillors, outside bodies for non-allotment related matters <b>Security</b> Staff trained in data handling Hard copies held in locked cabinet

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						Computer password protected Privacy notice on all emails from town Council
<b>Love Lane Cemetery</b>						
Cemetery Records	Statutory requirement to maintain to administer interments	Owner contact details Passed on from funeral directors	Hard copy. Spreadsheet. Kept indefinitely as ownership documents	Grave owners	Contract/ legislative requirement	<b>Risk</b> - Staff passing on details to public, councillors, outside bodies <b>Security</b> Staff trained in data handling Hard copies held in locked cabinet Computer password protected Privacy notice issued with new grave purchases from May 2018
Interment and headstone applications	Requirement to manage memorials in cemetery	Applicant contact details Passed on from funeral directors / memorial masons	Hard Copy. Spreadsheet Kept indefinitely as ownership documents	Grave owners	Contract	<b>Risk</b> - Staff passing on details to public, councillors, outside bodies <b>Security</b> Staff trained in data handling Hard copies held in locked cabinet Computer password protected Privacy notice issued with new grave purchases from May 2018
<b>Civic</b>						
Past Mayor's addresses	Invitations to civic functions/ events	Address, email	Electronic, paper Held indefinitely Removed as per retention policy	Past Mayors	Public Task	<b>Risk</b> Passing on contact details to those outside the organisation or using it for another purpose <b>Security</b> Addresses not be passed on containing personal data without first seeking the consent. Hard copies held in locked cabinet

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Honorary Townsman	Invitations to civic functions/ events	Address / email	Electronic, paper Removed as per retention policy	Honorary Townsmen	Public Task	<b>Risk</b> Passing on contact details to those outside the organisation or using it for another purpose <b>Security</b> Addresses not be passed on containing personal data without first seeking the consent. Hard copies held in locked cabinet
Mayoral Awards	To give awards	Address	Electronic / Hard Copy Removed as per retention policy	Award nominees and recipients	Public task	<b>Risk</b> Passing on contact details to those outside the organisation or using it for another purpose <b>Security</b> Addresses not be passed on containing personal data without first seeking the consent.
<b>Planning Applications</b>						
	Consultations on planning applications	Name and contact information of applicants received from planning register	Hard Copy On website (direct feed from Shropshire Council's planning portal) Hardcopy Paper Applications destroyed as per retention	Applicant	Legal Obligation as consultee on planning applications Public task	Paper Applications destroyed as per retention of information schedule.

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			of information schedule.			
<b>Property</b>						
	Leases/ Licences Service Level Agreements	Name and contact information of licensee/ leaseholder	Hard Copy held indefinitely or as per data retention	Leaseholder / licensee	contract	<b>Risk</b> Passing on contact details to those outside the organisation or using it for another purpose <b>Security</b> Addresses not be passed on containing personal data without first seeking the consent. Hard copies held in locked cabinet
<b>CCTV</b>						
CCTV Images	Contribute towards enhancing community safety and protect Town Council property	Electronic images from CCTV cameras around Wem	Electronic Images overwritten on a monthly basis	Anyone visiting or residing in the town	Public Task	<b>Risk</b> - When looking at an image of an individual there might well be other individuals in the shot who might not have given consent for the use of their image. <b>Security</b> Data currently stored locally. Only officers of West Mercia Police and Town Council view images Automatic periodic overwrite process. Registered with the ICO. Operated in line with ICO Code of Conduct Guidelines
<b>Local Connection</b>						
Applicants	Verification as per local	Supplied by Housing Association –	Until applicant verified.	Applicant for a property which	Public task	<b>Risk</b> Passing on contact details to those outside the organisation or using it for another purpose



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	connection policy	details required for verification	Destroyed as per data retention policy	requires a local connection		<b>Security</b> Hard copies held in locked cabinet
<b>Community Car Scheme</b>						
	Arrange journeys for those using the scheme	From individuals wishing to use scheme or volunteer as drivers	Passengers - data deleted on a monthly basis when journeys have been verified Drivers – data held until they no longer act as driver	Passenger and volunteer driver	Public task	<b>Risk</b> Passing on contact details to those outside the organisation or using it for another purpose <b>Security</b> Data held in electronic form on shared file not printed
<b>Covid 19 Support</b>						
	Provide food support to individuals	From individuals requesting help with food or other matters or volunteers offering help	On computer, retained until pandemic declared over	Recipients and volunteers	Public task	<b>Risk</b> Passing on contact details to those not involved with Covid 19 support prior to receiving permission from individual or using it for another purpose <b>Security</b> Data held in electronic form on shared file not printed

## Additional Notes:

1. Where electronic data is held then these are backed up regularly to a remote server to mitigate the risk of a catastrophic failure and the loss of operationally information. Confirmation of the appropriate GDPR compliance by the contractor that

12.10.21

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holds the IT maintenance contract is required. The Town Council does not knowingly collect any overly sensitive data such as children's or vulnerable adults' records, undertake covert surveillance or data that if a breach was to occur is likely to result in serious injury; nor does it seek to use personal data it receives for commercial gain (e.g. to sell another service).