



Date: 18 June 2018

Title: Data Protection

Purpose of the Report: To receive an update regarding GDPR and consider recommending approval of new/revised policies to Council.

Contact Officer: Sarah Sandiford, Head of Democratic and Central Services

Corporate Objective/s	LLTC Three Year Plan – Aim 1: To consolidate processes and procedures, ensuring operational efficiency and a structure which will underpin future service delivery by the Town Council.	
Implications:		
Financial	X	
Human Resources	X	
Operational/Service delivery	X	
Procedural/Legal	√	To ensure compliance with data protection legislation effective May 2018.

1. RECOMMENDATION/S

Should members be minded, the proposals are:

1.1 To consider recommending approval of the following to Council:

- (i) Information & Data Protection Policy
- (ii) ICT Security Policy
- (iii) Information Security Incident Policy
- (iv) Removable Media Policy
- (v) Town Council Privacy Notice
- (vi) Subject Access Requests procedure

2. BACKGROUND

- 2.1 The Data Protection Act 2018 received Royal Assent on 24 May 2018 and therefore replaces the 1998 Act. As the Committee is aware, the new legislation includes reference to the General Data Protection Regulation.

- 2.2 The Town Council has been working towards compliance with the new legislation for almost a year and has undertaken a number of measures, including an information audit, review of consent requirements, review of forms and documents, a general improvement in security of both electronic and paper based documentation and the revision/development of a number of policies and procedures.
- 2.3 Further to the GDPR deadline of 25 May 2018, work continues to ensure best practice throughout the organisation. Work still to be completed includes adoption of policies, archiving/destruction of data which is no longer required and further improvements in both physical and technological security.
- 2.4 An audit visit is to be scheduled by our appointed Data Protection Officer. In addition, it is envisaged that a number of internal audits will take place over the coming months to review individual departments and service areas.

3. POLICIES & PROCEDURES

- 3.1 As a result of the new legislation and recommendations made by the appointed DPO, the SLCC and NALC – further to guidance from the Information Commissioners Office – a number of Town Council policies have been revised or developed as new. These policies are designed to guide us on best practice and to ensure adequate safeguards in terms of data protection.
- 3.2 **Attached** are a number of draft policies, which the Committee is asked to review and consider recommending approval to Council. Most are based on existing policies or template policies developed specifically for the parish council sector.
- 3.3 Also attached is a proposed procedure in relation to Subject Access Requests, whereby members of the public may ask to see what, if any, personal data is being processed about them. Organisations now have a statutory duty to respond to such requests within a specified timescale.
- 3.4 The Committee is asked to note that the policies and procedures attached apply equally to Town Councillors as well as employees, particularly so with the advent of new meetings management software and following the resolution that all Town Councillors use a formal Town Council email address for all LLTC related matters.
- 3.5 The practicability of new and revised procedures will be monitored and any subsequent recommended changes will be brought back to Committee for consideration.
- 3.6 It is envisaged that further policies/protocols still need to be finalised, including a Document Retention Policy which is currently under review by officers.

End.