

## DATA PROTECTION AUDIT FORM

Name of Council:	Leighton Linlade Town Council
Clerk to the Council:	Paul Russell
Date of Audit:	10 <sup>th</sup> November 2022

### Data Protection Principles:

- Processed fairly, lawfully and in a transparent manner;
- Collected for specified, explicit and legitimate purposes and not further processed for other purposes incompatible with the original purpose;
- Adequate, relevant and limited to what is necessary in relation to the purposes;
- Accurate and kept up to date;
- Kept in a form that permits identification no longer than is necessary;
- Processed in a way that ensures appropriate security of the personal data.

<b>SECTION ONE: OVERVIEW</b>		
<b>DOCUMENT OR PROCEDURE</b>	<b>AUDIT COMMENTS</b>	<b>COMMENT</b>
Data collected	<ul style="list-style-type: none"> <li>• Council does collect personal data to carry out its legitimate business.</li> </ul>	Ensure Privacy Impact Assessment process in place in case any new services are to be delivered.
Data Protection Officer	<ul style="list-style-type: none"> <li>• No legal requirement for a DPO. Deputy Clerk oversees Data Protection at the Council and sends out regular reminders to all staff to be aware of data protection.</li> </ul>	Continue to remind staff of data protection obligations
ICO Registration	<ul style="list-style-type: none"> <li>• In place and renewed until 2023.</li> </ul>	Renewed annually

<b>SECTION ONE: POLICIES AND PROCEDURES</b>		
<b>DOCUMENT OR PROCEDURE</b>	<b>ACTION</b>	<b>COMMENT</b>
Data Protection Policy Policy on the website	<ul style="list-style-type: none"> <li>• Policy is on place;</li> <li>• Policy reviewed annually? Policy is reviewed periodically.</li> <li>• On website (updated March 2018 so needs review)</li> </ul>	Data Protection Policy requires review as soon as possible. Privacy notices need to be added to paper forms.

<b>SECTION ONE: POLICIES AND PROCEDURES</b>		
<b>DOCUMENT OR PROCEDURE</b>	<b>ACTION</b>	<b>COMMENT</b>
Privacy notices in place Privacy notices being used Evidence of privacy notices reviewed	<ul style="list-style-type: none"> <li>• Privacy notices in place;</li> <li>• Privacy notices being implemented via website but they need to be included on all hard copy forms;</li> <li>• A review of the privacy notices in place has been undertaken.</li> </ul>	Privacy notices to be included on all Cemetery forms and any other hard copy forms that contain personal data. Noted that recruitment application forms do contain data protection information.
Staff training available Staff training records in place Councillor training	<ul style="list-style-type: none"> <li>• Training for staff every 3 years remotely</li> <li>• Councillor training to be reviewed and data protection training to be provided to every new Councillor following election.</li> </ul>	Training is made available to both Councillors and staff. This is normally online. The training needs to be undertaken again to reinforce data protection, privacy rights and the importance of using official email accounts.
Procedure to handle Subject Access Requests Plan to handle requests Rights of Access Procedure	<ul style="list-style-type: none"> <li>• In place</li> <li>• SAR form in place.</li> </ul>	It is recommended that Council reviews its SAR procedure when it reviews its Data Protection Policy.
Procedure to undertake a Data Privacy Impact Assessment when new services are taken on.	<ul style="list-style-type: none"> <li>• No new services have been taken on as far as can be ascertained.</li> <li>• Review DPIA procedure.</li> </ul>	It is recommended that Council reviews its DPIA procedure when it reviews its Data Protection Policy.
Protection of children's personal data policy and/or Safeguarding Statement	<ul style="list-style-type: none"> <li>• TACTIC has the relevant procedures in place.</li> <li>• Safeguarding Statement</li> </ul>	It is recommended that Council reviews its Safeguarding Policy and Statement.
Does your organisation contact any EU member states (twinning associations etc)	<ul style="list-style-type: none"> <li>• Town Twinning Forum.</li> </ul>	Agreements are in place. No data protection issues identified.

SECTION TWO: DEMOCRATIC AND ADMINISTRATION			
DOCUMENT OR PROCEDURE	PAPER/ELECTRONIC	AUDIT COMMENTS	COMMENT
<b>Democracy</b>			
Official Councillor Emails	Electronic	<ul style="list-style-type: none"> <li>All Councillors are provided with an official Town Council email;</li> <li>Not all Councillors use their official email address to carry out Town Council related business;</li> <li>Councillor emails are publicised on the website;</li> <li>Councillors mainly contacted by Town Council Officers, local parishioners and local organisations.</li> </ul>	<p>It is recommended that the Town Council ensures that all Councillors are using their official email address.</p> <p>NALC advice can be found here regarding secure emails: <a href="https://www.nalc.gov.uk/news/the-importance-of-secure-email-systems-and-gov.uk-domains-for-local-councils">The importance of secure email systems and GOV.UK domains for local councils - News (nalc.gov.uk)</a></p>
Councillor Privacy Notice Consent	Paper and electronic	<ul style="list-style-type: none"> <li>Consent notice is in place at present. Councillor details obtained are as follows: <ul style="list-style-type: none"> <li>Name (essential)</li> <li>Address (optional)</li> <li>Telephone number (optional)</li> <li>Email address (official)</li> <li>Any specific requirements</li> </ul> </li> </ul>	Councillors should complete a Privacy Notice consent form to ensure that their wishes to share (or not) their personal data with electors is known and met.
Storage method of Councillor Information	Paper and electronic	<ul style="list-style-type: none"> <li>Electronic storage of personal details of Councillors in specific electronic folder;</li> <li>Email storage is on the main server.</li> </ul>	Council is just about to change its IT provider. The current IT system appears to be secure but moving to the Cloud will improve IT security and storage.
Retention of Councillor Information	Paper and electronic	<ul style="list-style-type: none"> <li>6 years from end of service as a Councillor. Reason: Time limits on litigation</li> <li>Process to delete information in place</li> </ul>	It is recommended that the Council's Retention Policy is reviewed alongside its Data Protection Policy. Hard copy and electronic data deletion is in place and Council should continue to monitor and improve its processes to delete

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			personal data not required.
<b>General</b>			
Public consultations	Paper and electronic	<ul style="list-style-type: none"> <li>Publicised website, social media, noticeboards. No personal data collected except in exceptional circumstances;</li> <li>As per retention policy. Held for 30 days on website then deleted.</li> <li>This time limit is included in the document retention policy</li> <li>Process to delete information in place.</li> </ul>	Robust processes are in place. Continue to monitor that processes are being observed and implemented.
Compliants	Paper and electronic	<ul style="list-style-type: none"> <li>Mainly received at info@ email and forwarded on to relevant officer. Email then deleted;</li> <li>As per retention policy. Held for 30 days on website then deleted.</li> <li>This time limit is included in the document retention policy</li> <li>Process to delete information in place.</li> </ul>	Robust processes are in place. Continue to monitor that processes are being observed and implemented.
Newsletter		<ul style="list-style-type: none"> <li>2,000 printed copies;</li> <li>Email to subscribed people who have provided consent;</li> <li>Mailerlite email system now operational. Provides subscribers opportunity to unsubscribe.</li> </ul>	Robust processes are in place. Continue to monitor that processes are being observed and implemented.
<b>Grants &amp; Awards</b>			
Grant forms (Sarah)	Paper and electronic	<ul style="list-style-type: none"> <li>Guaranteed grants</li> <li>Community grants</li> <li>Cost of Living grants</li> <li>Option to encourage people to sign</li> </ul>	Recommend that a short Privacy Notice is included on the grant forms.

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		up to updates.	
<b>Corporate including Financials</b>			
Accounts	Paper and electronic	<ul style="list-style-type: none"> <li>Hosted by Citrix, accounts package is Omega (Rialtas);</li> <li>6 years from the end of the relevant financial year. Reason: Required by legislation;</li> <li>Process to delete information in place;</li> <li>Storage in locked cabinets and secure room.</li> </ul>	Robust processes are in place. Continue to monitor that processes are being observed and implemented.
Update contract templates	Paper and electronic	<ul style="list-style-type: none"> <li>Saved on the L Drive (restricted access)</li> <li>Not all suppliers have a contract to supply. Only ones over £5,000.</li> </ul>	Robust processes are in place. Continue to monitor that processes are being observed and implemented.
Existing contractor compliance verification	Paper and electronic	<ul style="list-style-type: none"> <li>Contractors need to be compliant with the Data Protection Act 2018. Check to make sure contractors are checked for compliance;</li> <li>Compliance verification always requested during tender process.</li> </ul>	Recommend that existing contractors provide a written undertaking that they are GDPR compliant as part of Council's due diligence. No issues were identified.
Invoicing	Paper and electronic	<ul style="list-style-type: none"> <li>Some invoices include personal information from suppliers due to the size and nature of their business;</li> <li>Records and invoices are stored in locked cabinets;</li> <li>Secure storage of paper copies in place;</li> <li>Electronic records are protected by at least two passwords.</li> </ul>	Robust processes are in place. Continue to monitor that processes are being observed and implemented.
Payment to suppliers	Paper and electronic	<ul style="list-style-type: none"> <li>Invoices are received in both paper and electronic format. Invoices</li> </ul>	Robust processes are in place. Continue to monitor that

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		<ul style="list-style-type: none"> <li>include bank details etc;</li> <li>The majority of payments are made by BACS and direct debit;</li> <li>Credit cards x 2 (Town Clerk and Deputy Clerk);</li> <li>Secure process in place for payments by credit card;</li> <li>Cards are kept in secure place.</li> </ul>	<p>processes are being observed and implemented.</p> <p>Financial Regulations are in place and are followed.</p>
Payroll	Paper and electronic	<ul style="list-style-type: none"> <li>All payroll information is kept in both paper and electronic format. Timesheets kept on Shared Drive;</li> <li>Electronic format is secured on the L Drive;</li> <li>Wage slips filed electronically. All payroll information retained in only electronic format;</li> <li>Payroll details submitted to external contractor for reconciling and journaling;</li> <li>All payroll is delivered by an external contractor using information provided by LLTC;</li> <li>Payroll provider has GDPR verification of compliance;</li> <li>Sensitive information sent via email. Emails are to be encrypted and information received is password protected.</li> </ul>	<p>Robust processes are in place. Continue to monitor that processes are being observed and implemented.</p> <p>Recommend that every application packs includes a Data Protection Privacy Notice. No issues were identified and all application forms had a Data Protection statement included.</p> <p>Recommend that external payroll provider submits a written undertaking that they are GDPR compliant as part of Council's due diligence. No issues were identified.</p>
Personnel Records	Paper and electronic	<ul style="list-style-type: none"> <li>Retained in both a secured filing cabinet and electronically on the L Drive;</li> <li>Office is locked at end of use.</li> </ul>	<p>Robust processes are in place. Continue to monitor that processes are being observed and implemented.</p>

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Recruitment	Paper and electronic	<ul style="list-style-type: none"> <li>• Successful applicants information will be retained during their employment;</li> <li>• Unsuccessful applicant information deleted after six months.</li> </ul>	Robust processes are in place. Continue to monitor that processes are being observed and implemented.
<b>Services</b>			
Facilities	Paper and electronic	<ul style="list-style-type: none"> <li>• Personal information collected from all hirers;</li> <li>• Mainly electronic forms submitted;</li> <li>• Word documents (online form to be developed) for hire forms.</li> </ul>	Recommend that a short privacy notice is included on the hirer forms.
Bookings	Paper and electronic	<ul style="list-style-type: none"> <li>• Bookings package (Rialtas) used</li> <li>• All bookings uploaded onto package and includes personal contact information.</li> </ul>	Robust processes are in place. Continue to monitor that processes are being observed and implemented.
Allotments	Paper and electronic	<ul style="list-style-type: none"> <li>• Personal information obtained to record allotment plot holder ;information and to send invoice</li> <li>• Allotment records are kept for a minimum of six years;</li> <li>• No privacy notice is in place;</li> <li>• The allotment association often requests personal details but these are not provided;</li> <li>• Allotment association subs are collected by the Town Council;</li> <li>• Receipts record the name of the allotment holder and the plot number(s).</li> </ul>	<p>Robust processes are in place. Continue to monitor that processes are being observed and implemented.</p> <p>Recommend that a short privacy notice is included on the allotment form.</p>
Cemetery	Paper and electronic	<ul style="list-style-type: none"> <li>• Two cemeteries operational;</li> <li>• Personal information collected;</li> <li>• Details of grave owners needs to be proactively updated on a regular</li> </ul>	Recommend that a short privacy notice is included on all cemetery and memorial forms.

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		<ul style="list-style-type: none"> <li>basis;</li> <li>Personal details relating to Memorial information needs to be updated regularly.</li> </ul>	<p>Recommend that personal information relating to grave owners and memorial owners is updated every three to five years via letter or email.</p> <p>Recommend that email addresses of all memorial owners are collected.</p>
Twinning	Paper and electronic	<ul style="list-style-type: none"> <li>Personal email of Chair recorded in email client software;</li> <li>Working group;</li> <li>Visits arranged annually.</li> </ul>	Robust processes are in place. Continue to monitor that processes are being observed and implemented.
Parks and Open Spaces		<ul style="list-style-type: none"> <li>No personal or sensitive information is obtained to manage this service.</li> </ul>	Robust processes are in place. Continue to monitor that processes are being observed and implemented.
<b>Disposal</b>			
Disposal of IT assets	Electronic	<ul style="list-style-type: none"> <li>External contractor in place;</li> <li>Old hard drives extracted from computers and destroyed.</li> </ul>	Recommend that written confirmation is requested from external contractors that all end of life storage devices have been erased/destroyed.
Disposal of sensitive hard copy information	Paper	<ul style="list-style-type: none"> <li>External contractor in place;</li> <li>Sensitive information and documentation is shredded when disposed of.</li> </ul>	Robust processes are in place. Continue to monitor that processes are being observed and implemented.
Photocopier/scanner	Electronic	<ul style="list-style-type: none"> <li>Hard drive in old photocopier/scanner should be fully deleted or destroyed.</li> </ul>	Recommend that written confirmation is requested from external contractors that all end of life storage devices have been erased/destroyed.



<b>SECTION THREE: DATA SECURITY PROCEDURES</b>			
<b>DOCUMENT OR PROCEDURE</b>	<b>PAPER/ELECTRONIC</b>	<b>AUDIT COMMENTS</b>	<b>COMMENT</b>
<b>IT Processes</b>			
Levels of password protection	Electronic	<ul style="list-style-type: none"> <li>• Citrix log in requires password changes every three months;</li> <li>• Computer passwords change every six months;</li> <li>• Passwords are only known by the user;</li> <li>• New passwords are generated by IT company if forgotten and changed by user;</li> <li>• No paper records are kept of passwords;</li> <li>• All computers are password protected.</li> </ul>	<p>Robust processes are in place. Continue to monitor that processes are being observed and implemented.</p> <p>Recommend that new IT provider provides written statement that it complies with GDPR and has robust security in place.</p>
Data back-up procedures	Electronic	<ul style="list-style-type: none"> <li>• Citrix back-up is carried out by MicroshadeVSM;</li> <li>• Internal server backed up by IT company and also on hard drive;</li> <li>• IT being moved to cloud through CloudyIT;</li> <li>• C drive not backed up at present. Review once new IT system in place.</li> </ul>	<p>Robust processes are in place. Continue to monitor that processes are being observed and implemented.</p> <p>Recommend that no data is stored on personal devices and that all employees carry out Council work on the shared drive, restricted drive or personal area provided it is being backed up.</p>
Sensitive Information Access	Electronic	<ul style="list-style-type: none"> <li>• There is a secure folder L Drive. Restricted access;</li> <li>• Finance/payroll etc in this area.</li> </ul>	<p>Robust processes are in place. Continue to monitor that processes are being observed and implemented.</p>
Operating system updates	Electronic	<ul style="list-style-type: none"> <li>• All computers in the Town Council are operating on Windows 10;</li> <li>• Windows updates are installed</li> </ul>	<p>Robust processes are in place. Continue to monitor that processes are being observed</p>

		<p>automatically on all computers. IT company oversee;</p> <ul style="list-style-type: none"> <li>• MicroshadeVSM updates software regularly;</li> <li>• Other software updated via IT company.</li> </ul>	<p>and implemented.</p> <p>Recommend that confirmation is sought from new IT provider regarding operating system updates, processes and procedures.</p>
Virus protection and updates	Electronic	<ul style="list-style-type: none"> <li>• All town council computers are protected by antivirus software. This will be updated when system moves to new provider;</li> <li>• All computers update regularly via the IT company;</li> <li>• CloudyIT to continue with their specific product.</li> </ul>	<p>Robust processes are in place. Continue to monitor that processes are being observed and implemented.</p>
Personal data information storage	Paper and Electronic	<ul style="list-style-type: none"> <li>• Currently, storage of personal data is mixed. Council is moving to reduce paper copies and focus on electronic backups;</li> <li>• Check to ensure that no personal data relating to employees as individuals is held on the shared drive or on personal C drives.</li> </ul>	<p>Robust processes are in place. Continue to monitor that processes are being observed and implemented.</p> <p>Recommend that all employees are requested to remove any personal data from their computers or to confirm that no personal data is currently being stored on Council devices.</p>

<b>SECTION FOUR: PERSONAL DATA COLLECTED</b>			
<b>DOCUMENT OR PROCEDURE</b>	<b>PAPER/ELECTRONIC</b>	<b>AUDIT COMMENTS</b>	<b>COMMENT</b>
<b>Type of Data Collected</b>			
Name	Paper and Electronic	<ul style="list-style-type: none"> <li>• All personal data acquired normally includes the name of the individual. This is usually recorded electronically either via email or on Council forms. Paper based records are gradually</li> </ul>	<p>All Departments observe GDPR requirements for retaining personal data.</p>

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DOCUMENT OR PROCEDURE	PAPER/ELECTRONIC	AUDIT COMMENTS	COMMENT
<b>Type of Data Collected</b>			
		<p>being reduced and any information required is scanned and saved with the hard copy deleted;</p> <ul style="list-style-type: none"> <li>The Council does not share this information;</li> <li>There is no formal recording of telephone calls where personal data is obtained.</li> </ul>	<p>Council is compliant with the way it handles all the personal data it retains.</p> <p>Council aims to delete any personal data it collects as soon as possible if it does not need to retain it to deliver its various services.</p>
Contact Details	Paper and Electronic	<ul style="list-style-type: none"> <li>All personal contact data acquired may include the address of the individual. This is normally recorded electronically and is obtained to liaise with the client or respond to a compliant.</li> <li>The Council does not share this information;</li> <li>There is no formal recording of telephone calls where personal data is obtained.</li> </ul>	Council is compliant across its service areas.
Email	Paper and Electronic	<ul style="list-style-type: none"> <li>Emails are collected to enable Council to respond electronically and to develop email contact lists;</li> <li>All contact lists for promotional activities obtain consent if required;</li> <li>Emails are retained on a secure server.</li> </ul>	<p>Council is compliant across its service areas.</p> <p>Mailerlite is the package used for contact lists and is GDPR compliant.</p>
Date of birth/age	Paper and Electronic	<ul style="list-style-type: none"> <li>This information only collected to deliver specific services such as payroll and TACTIC.</li> </ul>	Council is compliant across its service areas.
Religion or belief	Paper and Electronic	<ul style="list-style-type: none"> <li>This information is only collected to delivery cemetery services.</li> </ul>	Council is compliant across its service areas.

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<b>Type of Data Collected</b>			
Financial details	Paper and Electronic	<ul style="list-style-type: none"> <li>This information is collected from staff, Councillors, contractors and users of various council services to enable financial transactions to be completed efficiently;</li> <li>Salary payments are made by BACS;</li> <li>Invoices are normally paid by BACS;</li> <li>Income is collected mainly by electronic payments</li> </ul>	Council is compliant across its service areas.
Racial or ethnic origin/nationality	Paper and Electronic	<ul style="list-style-type: none"> <li>This information is collected mainly from employees to ensure they have the right to work.</li> </ul>	Council is compliant across its service areas.
Disability status	Paper and Electronic	<ul style="list-style-type: none"> <li>This information is requested from applicants when recruitment is undertaken.</li> <li>This information may be requested from Councillors to ensure that any specific needs are addressed.</li> <li>Services delivered by TACTIC may also require this collection.</li> </ul>	Council is compliant across its service areas.
Physical/mental health info	Paper and Electronic	<ul style="list-style-type: none"> <li>This information is only requested from applicants when recruitment is undertaken.</li> <li>Staff health information is retained in Personnel files to enable Council to meet any specific needs</li> </ul>	Council is compliant across its service areas.
Sexual life	Paper and Electronic	<ul style="list-style-type: none"> <li>This information is not normally collected.</li> </ul>	Council is compliant across its service areas.
References	Paper and Electronic	<ul style="list-style-type: none"> <li>This information is only requested from applicants when recruitment is undertaken.</li> </ul>	Council is compliant across its service areas.

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<b>Type of Data Collected</b>			
		<ul style="list-style-type: none"> <li>Reference information is only acted upon if someone is offered a position in the Council.</li> <li>References are retained in staff files.</li> </ul>	
Education	Paper and Electronic	<ul style="list-style-type: none"> <li>This information is only requested from applicants when recruitment is undertaken.</li> <li>Staff education information is retained in Personnel files</li> </ul>	Council is compliant across its service areas.
Training requirements	Paper and Electronic	<ul style="list-style-type: none"> <li>This information is requested from applicants once recruited to ensure that there is Continuous Professional Development;</li> <li>Staff training records and needs are kept in Personnel files to enable Council to meet any specific needs;</li> <li>Councillor training records are also kept securely.</li> </ul>	Council is compliant across its service areas.
Employment details	Paper and Electronic	<ul style="list-style-type: none"> <li>This information is requested from applicants when recruitment is undertaken.</li> <li>Previous employment details are kept in the relevant personnel file</li> <li>Current employment details are kept in relevant personnel files</li> </ul>	Council is compliant across its service areas.
Gender/gender reassignment	Paper and Electronic	<ul style="list-style-type: none"> <li>This information is not collected at any time.</li> </ul>	N/A
Goods or services provided	Paper and Electronic	<ul style="list-style-type: none"> <li>This information is requested from sole traders and companies. No personal information is normally gathered or recorded.</li> </ul>	Council is compliant across its service areas.

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<b>Type of Data Collected</b>			
Offences	Paper and Electronic	<ul style="list-style-type: none"> <li>This information is only requested from applicants when recruitment is undertaken.</li> <li>Any offences committed whilst in the employment of the town council will be recorded and stored appropriately.</li> </ul>	Council is compliant across its service areas.
Criminal record	Paper and Electronic	<ul style="list-style-type: none"> <li>This information is only requested from applicants when recruitment is undertaken.</li> <li>There are a number of positions within the town council currently require a DBS check</li> </ul>	Council is compliant across its service areas.
Marital status	Paper and Electronic	<ul style="list-style-type: none"> <li>This information is collected for pension information;</li> <li>Titles of individuals are collected which may give some indication of marital status.</li> </ul>	Council is compliant across its service areas.
Pregnancy/maternity status	Paper and Electronic	<ul style="list-style-type: none"> <li>This information would only be obtained from staff.</li> </ul>	Council is compliant across its service areas.
Biometric data	Paper and Electronic	<ul style="list-style-type: none"> <li>This information is not collected at any time.</li> </ul>	N/A
Trade union membership	Paper and Electronic	<ul style="list-style-type: none"> <li>This information is not collected.</li> </ul>	N/A
Medical information	Paper and Electronic	<ul style="list-style-type: none"> <li>This information is collected from staff when required and to deliver TACTIC services.</li> </ul>	Council is compliant across its service areas.
Photographs	Electronic	<ul style="list-style-type: none"> <li>Photos are collected from Councillors and staff;</li> <li>Photos of events and other Council activities are taken and stored;</li> <li>Council obtains consent to use photographs.</li> </ul>	Council is compliant across its service areas.

<b>SECTION FIVE: TACTIC</b>			
<b>DOCUMENT OR PROCEDURE</b>	<b>PAPER/ELECTRONIC</b>	<b>AUDIT COMMENTS</b>	<b>COMMENT</b>
<b>Type of Data Collected</b>			
Name	Paper and Electronic	<ul style="list-style-type: none"> <li>All personal data acquired includes the name of the individual. This is normally recorded in both paper and/or electronic form.</li> <li>Sharing of this information is only implemented if verbal consent has been obtained.</li> <li>There is currently no formal recording of telephone calls where personal data is obtained or if verbal consent over the telephone is requested and obtained.</li> </ul>	Robust processes are in place. Continue to monitor that processes are being observed and implemented.
Other data	Paper and Electronic	<ul style="list-style-type: none"> <li>Name, DOB, Contact details, employment details, references, education &amp; training details, gender, criminal offences, pregnancy and maternity status, disability status, mental health and medical information is obtained;</li> <li>Data is collected from the public, volunteers, payroll, those taking part in the event and competitions;</li> <li>Information is updated on an annual and ad-hoc basis as and when required.</li> </ul>	<p>Robust storage processes are in place. Information mainly stored electronically.</p> <p>Continue to monitor that the processes relating to securely storing personal data are being observed and implemented.</p>
Storage	Paper and Electronic	<ul style="list-style-type: none"> <li>Hard copies stored in secure cabinets;</li> <li>Electronic information is stored on the "O" drive;</li> <li>External hard drive S also used.</li> </ul>	Robust processes are in place. Continue to monitor storage security and ensure processes are observed.

<b>SECTION SIX: MARKETS</b>			
<b>DOCUMENT OR PROCEDURE</b>	<b>PAPER/ELECTRONIC</b>	<b>AUDIT COMMENTS</b>	<b>COMMENT</b>
<b>Type of Data Collected</b>			
Name	Paper and Electronic	<ul style="list-style-type: none"> <li>All personal data acquired includes the name of the individual. Storage of information is retained on Shared Drive and Email server;</li> <li>Sharing of this information is only implemented if consent has been obtained.</li> <li>There is no formal recording of telephone calls where personal data may be obtained or if verbal consent over the telephone has been requested and obtained;</li> <li>Contact details are stored on Team mobile phones. Mobile phones have password/pin protection.</li> </ul>	Robust processes are in place. Continue to monitor that processes are being observed and implemented.
Other data	Paper and Electronic	<ul style="list-style-type: none"> <li>Name, DOB, Contact details, employment details, education &amp; training details, gender, criminal offences and information regarding goods and services is obtained;</li> <li>Photographs are also collected;</li> <li>Data is collected from the public, volunteers, contractors/suppliers, community organisations, those taking part in the event, competitions, surveys and public consultations;</li> <li>Information is updated on an ad-hoc basis as and when required.</li> </ul>	<p>Robust storage processes are in place. Information mainly stored electronically.</p> <p>Continue to monitor that the processes relating to securely storing personal data are being observed and implemented.</p>
Storage	Paper and Electronic	<ul style="list-style-type: none"> <li>Hard copies stored in secure cabinets;</li> <li>Electronic information is stored on the shared drive and mobile phones.</li> </ul>	Robust processes are in place. Continue to monitor storage security and ensure processes are observed.



<b>SECTION SIX: MARKETS</b>			
DOCUMENT OR PROCEDURE	PAPER/ELECTRONIC	AUDIT COMMENTS	COMMENT
<b>Type of Data Collected</b>			
Mailing Lists	Electronic	<ul style="list-style-type: none"> <li>• Mailing lists are on the main servers;</li> <li>• Volunteer and contractor mailing lists are also stored on the shared drive;</li> <li>• Enquires are stored on shared drive and deleted as appropriate.</li> </ul>	Robust processes are in place. Continue to monitor storage security and ensure processes are observed.
Trader/Public Survey Forms	Paper and Electronic	<ul style="list-style-type: none"> <li>• Website and hard copy;</li> <li>• Privacy notice included.</li> </ul>	Recommend that Privacy Notices be reviewed and updated if required on all electronic and hard copy forms.
Photographs	Electronic	<ul style="list-style-type: none"> <li>• Photos of events taken and stored.</li> <li>• Care is taken not to take photos where people can be identified;</li> <li>• Consent is sought in writing for the use of any photos taken of individuals that may be used in publicity;</li> <li>• Consent obtained from parent/guardian to take and use photos.</li> </ul>	Ensure that the proper processes are followed and consent is obtained for any photographs used officially.

<b>SECTION SEVEN: EVENTS</b>			
DOCUMENT OR PROCEDURE	PAPER/ELECTRONIC	AUDIT COMMENTS	COMMENT
<b>Type of Data Collected</b>			
Personal Data	Paper and Electronic	<ul style="list-style-type: none"> <li>• All personal data acquired includes the name of the individual. Contact details, financial details and goods and services information;</li> <li>• Data is also collected from the public, volunteers, contractors and suppliers, community organisations and those taking part in events;</li> <li>• Information is updated annually;</li> </ul>	<p>Robust storage processes are in place. Information mainly stored electronically.</p> <p>Continue to monitor that the processes relating to securely storing personal data are being observed and implemented.</p>

SECTION SEVEN: EVENTS			
DOCUMENT OR PROCEDURE	PAPER/ELECTRONIC	AUDIT COMMENTS	COMMENT
<b>Type of Data Collected</b>			
		<ul style="list-style-type: none"> <li>Storage of trader information is retained on Shared Drive and Email server;</li> <li>Sharing of this information is only implemented if consent has been obtained.</li> <li>There is no formal recording of telephone calls where personal data may be obtained or if verbal consent over the telephone has been requested and obtained;</li> <li>Contact details are stored on Team mobile phones. Mobile phones have password/pin protection.</li> </ul>	
Mailing Lists	Electronic	<ul style="list-style-type: none"> <li>Mailing lists are developed through Mailerlite;</li> <li>Survey Monkey was previously used.</li> </ul>	<p>Robust process in place to ensure data remains secure. Mailerlite system is GDPR compliant and has training videos available. Recommend staff view these: <a href="#">How MailerLite Stays GDPR-Compliant - MailerLite</a></p>
Trader/Performer Forms	Paper and Electronic	<ul style="list-style-type: none"> <li>Website and hard copy;</li> <li>Privacy notice included;</li> <li>Mainly stored electronically.</li> </ul>	Robust process in place to ensure data remains secure.
Photographs	Electronic	<ul style="list-style-type: none"> <li>Photos of events taken and stored.</li> <li>Care is taken not to take photos where people can be identified;</li> <li>Consent is sought in writing for the use of any photos taken of individuals that may be used in publicity.</li> </ul>	<p>Robust process in place to ensure data remains secure.</p> <p>Continue to monitor that processes are observed and consent is obtained when photos are used officially.</p>

**SECTION EIGHT: OPEN SPACES**

DOCUMENT OR PROCEDURE	PAPER/ELECTRONIC	AUDIT COMMENTS	COMMENT
<b>Type of Data Collected</b>			
Personal Data	Paper and Electronic	<ul style="list-style-type: none"> <li>• All personal data acquired includes the name of the individual, contact details, financial details and goods and services information;</li> <li>• Data is also collected from the Councillors, public, volunteers, allotment holders, Cemetery users, payroll, contractors and suppliers, community organisations and those taking part in events;</li> <li>• The department also collects data via surveys and public consultation;</li> <li>• Data is collected from representatives of sports teams and hirers of facilities;</li> <li>• Information is updated on an ad-hoc basis as and when required;</li> <li>• Storage of trader information is retained on Shared Drive and Email server;</li> <li>• Sharing of this information is only implemented if consent has been obtained.</li> <li>• There is no formal recording of telephone calls where personal data may be obtained or if verbal consent over the telephone has been requested and obtained;</li> <li>• Contact details are stored on Team mobile phones. Mobile phones have password/pin protection.</li> </ul>	<p>Robust storage processes are in place. Information mainly stored electronically.</p> <p>Continue to monitor that the processes relating to securely storing personal data are being observed and implemented.</p>

<b>SECTION NINE: VENUE HIRE</b>			
DOCUMENT OR PROCEDURE	PAPER/ELECTRONIC	AUDIT COMMENTS	COMMENT
<b>Type of Data Collected</b>			
Personal Data	Paper and Electronic	<ul style="list-style-type: none"> <li>All personal data acquired includes the name of the individual, contact details and financial details;</li> <li>Data is also collected from the public, allotment holders, contractors and suppliers, those taking part in events and competitions and community organisations;</li> <li>Data is also collected via surveys and public consultation;</li> <li>Data is collected from representatives of sports teams and hirers of facilities;</li> <li>Information is updated either annually or on an ad-hoc basis as and when required.</li> </ul>	<p>Robust storage processes are in place. Information mainly stored electronically.</p> <p>Continue to monitor that the processes relating to securely storing personal data are being observed and implemented.</p>
Storage	Paper and Electronic	<ul style="list-style-type: none"> <li>Mainly stored electronically either on the in-house server or on cloud based applications</li> </ul>	Robust storage processes are in place. Information mainly stored electronically.

<b>SECTION TEN: STORAGE</b>			
DOCUMENT OR PROCEDURE	PAPER/ELECTRONIC	AUDIT COMMENTS	COMMENT
<b>Storage Locations/Systems</b>			
The White House	Paper and electronic	<p>All Council records are held at this location. This includes hard copy and electronic data. The IT system is moving over to a Cloud Based system which will improve IT security.</p> <p>The following hard storage systems are in place</p> <ul style="list-style-type: none"> <li>Secured cabinets</li> </ul>	<p>Continue to ensure that the building is secure (alarmed) and that computer equipment is password protected.</p> <p>No data should be held on individual computer hard drives</p>

<b>SECTION TEN: STORAGE</b>			
<b>DOCUMENT OR PROCEDURE</b>	<b>PAPER/ELECTRONIC</b>	<b>AUDIT COMMENTS</b>	<b>COMMENT</b>
<b>Storage Locations/Systems</b>			
		<ul style="list-style-type: none"> <li>Secured desk drawers</li> <li>Secure safes</li> </ul>	
Copier Room	Paper and electronic	<p>The following items are held:</p> <ul style="list-style-type: none"> <li>Councillor related paperwork</li> <li>No sensitive personal details stored in this area</li> </ul> <p>The following storage systems are in place</p> <ul style="list-style-type: none"> <li>Open shelving system</li> <li>Cabinets</li> </ul>	Council is compliant across its service areas.
Finance Office	Paper and electronic	<p>The following items are held:</p> <ul style="list-style-type: none"> <li>Personnel records</li> <li>Timesheets</li> <li>Recruitment records/files</li> <li>Finance related paperwork</li> </ul> <p>The following storage systems are in place</p> <ul style="list-style-type: none"> <li>Secured bookcase</li> <li>Secured filing cabinets</li> <li>Safe</li> <li>Secured desk drawers</li> <li>Open shelving system</li> </ul>	Council is compliant across its service areas.
Events Office	Paper and electronic	<p>The following items are held:</p> <ul style="list-style-type: none"> <li>Customer information</li> <li>Email client information</li> <li>Council related paperwork</li> <li>Financial information (credit card machine)</li> </ul>	Council is compliant across its service areas.

<b>SECTION TEN: STORAGE</b>			
<b>DOCUMENT OR PROCEDURE</b>	<b>PAPER/ELECTRONIC</b>	<b>AUDIT COMMENTS</b>	<b>COMMENT</b>
<b>Storage Locations/Systems</b>			
		<p>The following storage systems are in place</p> <ul style="list-style-type: none"> <li>• Secured bookcase</li> <li>• Secured filing cabinets</li> <li>• Secured desk drawers</li> <li>• Open shelving system</li> </ul>	
Council Offices in general	Paper and electronic	<p>The following items are held:</p> <ul style="list-style-type: none"> <li>• Customer information</li> <li>• Email client information</li> <li>• Consultation and survey information</li> <li>• Recruitment records/files</li> <li>• Council related paperwork</li> <li>• Allotment information</li> <li>• Cemetery information</li> </ul> <p>The following storage systems are in place</p> <ul style="list-style-type: none"> <li>• Secured bookcase</li> <li>• Secured filing cabinets</li> <li>• Secured desk drawers</li> <li>• Open shelving system</li> </ul>	Council is compliant across its service areas.
Reception	Paper and electronic	There is no sensitive information stored on reception, only forms and leaflets.	Council is compliant across its service areas.
Basement	Electronic	<p>The Council server is located in the basement.</p> <p>The server is Firewall protected and all computers have antivirus software installed.</p>	Council is compliant across its service areas.