

GDPR Compliance Activities

The Clerk a GDPR update provided by the Local Council Public Advisory Service on 15th January, and identified the following issues that may require consideration:

1) General Issues

- a) Although there is no requirement for a Parish Council to appoint a Data Protection Officer (it may), if appointed, the individual may not be the Clerk. The LCPAS provides a subscription service for Parish Council, where it will act as the DPO on behalf of the Parish Council.
- b) Public Authority unstructured data (Notebooks, sticky notes, hand written minutes, bookings enquiries etc) is exempt from most of the provisions but is still subject to data access requests. Don't keep this information longer than required. It also still needs to be safeguarded from unauthorised access.
- c) Activities carried out as a Local Authority (Allotments, Tenancies, Burials does not require consent but data must be safeguarded.
- d) Individuals have a right to be informed how data is processed and stored, and have certain rights relating to their data (access, rectification, erasure, restricted processing, portability and objection).

2) Actions

- a) Check that Officer's Councillors and the Council is insured against personal financial loss resulting from a Data Protection Breach
- b) Put in place privacy notices (processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller)
- c) Consider a dedicated Council e-mail address for each Councillor
- d) Consider signing up to LCPAS Data Protection Officer Service
- e) Consider encryption for e-mails and files/folder – for example Microsoft 365
- f) Exchanging information by e-mail – currently it is possible to password protect both excel and word documents. However, this is not possible with the basic Adobe read write functions, and it may be worth considering subscribing to Adobe Pro DC. This would mean that any sensitive documents (for example bank account and sort codes which may need to be exchange for grant applications) can be sent securely with password encryption. Annual subscription would cost £150.92 plus VAT.

Work is ongoing on identifying data held in both digital and hard copy by the Parish Council.

An on-line assessment tool has been used to establish gaps in the work identified to comply with GDPR, and a further ICO assessment tool to establish the lawful use of data which the Parish Council processes, in order to be able to develop an appropriate privacy notice.

The clerk is investigating further whether "Public Task" is the most appropriate Lawful basis for processing parish council data.