M : 07593662123
E : processmatters2@gmail.com
W : processmatters2.co.uk

Data Mapping Exercise - Hunston Parish Council

March 2018

Background

Hunston Parish Council (the Parish Council) is undergoing a review of its processes and practices to ensure compliance with the GDPR.

To ensure that it is aware of the lawful basis for processing it has carried out a complete review of all areas where data enters the organisation, what consent it gained, how the data is secured and how it is disposed of.

Method

The Clerk engaged in a process mapping exercise which identified all information the Parish Council currently holds.

Findings

1. The Council is registered with the Information Commissioner

2. The Council is required to have an external Data Protection Officer.

3. The Council has a number of forms both in paper and online that do not identify the Controller and the purpose for the collection of data.

4. Third party data sharing agreements are not in place with all data processors such as the auditors and insurers.

6. There is a good understanding about how the web site, Cloud storage and other IT related issues are currently managed. Office 365 and Sharepoint are used but there is an issue about how emails to Councillors are used.

7. There is a need to implement a suite of new policies and procedural notes.

Recommendations

1. An IT security policy and Data Protection Policy needs to be adopted and signed by all staff and Councillors. This needs to be part of an adopted Induction Programme.

2. All staff and Councillors must undergo Data Protection training.

3. A data retention policy needs to be adopted to ensure that future data is kept only for as long as necessary to fulfil the purpose for which it was collected.

4. A review of IT security needs to be carried out to establish the current baseline.

5. To ensure data security and continuity Microsoft 365 and Sharepoint should be implemented across the organisation with all Councillors having an email address that belongs to the Council and where emails can be accessed by the Controller after Councillors have left the organisation.

6. The web site needs to be updated to include a privacy policy and a DSA request notice. (it is further recommended, although not part of the GDPR review that the PC uses its web site as its Freedom of Information Publication Scheme).

7. Paper information should be 'culled' and where the retention can no longer be justified it should be shredded. If it needs to be retained it would advantageous for the Council to consider scanning back copies where possible and going forward to stop filing paper copies and hold them online. This will improve security and resilience.