

## PERSONAL DATA AUDIT

### PART A - OUR INFORMATION - PERSON COMPLETING QUESTIONNAIRE

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DATA CONTROLLER HIGH HOYLAND PARISH MEETING  
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### PART B - COMMUNICATION PERSONAL DATA

**TYPES OF PERSONAL DATA KEPT BY HIGH HOYLAND PARISH MEETING -** NAMES, ADDRESSES, E-MAIL  
TELEPHONE NUMBERS, CONTRACTS,

**WHERE DOES THE PARISH MEETING GET THE PERSONAL DATA FROM? -** STAFF, RESIDENTS, LOCAL  
AUTHORITY, CONTRACTORS

**WHY DOES THE PARISH MEETING COLLECT OR PROCESS THE DATA? WHAT DOES THE PARISH  
MEETING DO WITH THE PERSONAL DATA? -** FOR PURPOSES RELATING TO PERFORMANCE OF  
STATUTORY FUNCTIONS, STAFF SERVICES, CONTRACT MANAGEMENT, LOCAL RESIDENT SERVICES (OIL  
GROUP, SOCIAL GROUP) COMMUNICATION

**WHO DOES THE COUNCIL DISCLOSE PERSONAL DATA TO? -** THE PUBLIC, ELECTORS & PARISHIONERS,  
CONTRACTORS

**DO THE PARISH MEETING MINUTES CONTAIN PERSONAL INFORMATION? -** YES - NAMES

**DOES THE PARISH MEETING EVER SEND PERSONAL DATA OVERSEAS? -** NO, ALL PARISH MEETING  
BUSINESS IS HELD IN PAPER FORM IN PRIVATE OFFICE IN CLERK'S HOME, ON PASSWORD ENCRYPTED  
COMPUTER, ON DISCS HELD BY INTERNAL AUDITOR & PETER JOHNSON (PARISHIONER). HOWEVER  
THE BMBC WEBSITE MAY BE ACCESSED FROM OVERSEAS AND THE PARISH MEETING HAS A PAGE ON  
THAT WEBSITE SO THAT INFORMATION ON THE PARISH MEETING CAN BE FOUND OVERSEAS.

**DOES THE COUNCIL COLLECT ANY SENSITIVE PERSONAL DATA?** NO

### PART C - SUPPLIERS, COMPANIES & OTHER ORGANISATIONS WITH WHOM THE PARISH MEETING HAS CONTRACTS INTERNAL & EXTERNAL AUDITORS

**ABOUT WHOM DOES THE COUNCIL KEEP PERSONAL DATA?** BMBC PERSONNEL, YLCA PERSONNEL,  
PARISHIONERS & OTHER LOCAL RESIDENTS WHO OPT INTO THE OIL BUYING GROUP  
CONTRACTORS

## **PERSONAL DATA AUDIT (CONT.)**

**WHERE DOES THE COUNCIL GET THE INFORMATION FROM?** INDIVIDUALS, LOCAL AUTHORITY, SUPPLIERS

**WHY DOES THE COUNCIL COLLECT/PROCESS THE DATA?** COMMUNICATION PURPOSES, MANAGE PERSONNEL/CONTRACTORS/ADVISORS, LEGAL OBLIGATIONS (E.G. RECORDING MINUTES & PUBLISHING THEM)

### **PART D - GENERAL INFORMATION ABOUT PERSONAL DATA**

**HOW DOES THE PARISH MEETING HANDLE THE PERSONAL DATA COLLECTED?** IN PAPER FORM - STORED IN FILES & CABINETS IN THE CLERK'S PRIVATE OFFICE IN HER ALARM - SECURED HOME. IN ELECTRONIC FORM - ON A PASSWORD ENCRYPTED COMPUTER, COPIES OF VITAL INFORMATION ARE KEPT ON DISCS, ONE WITH THE CLERK IN THE OFFICE, ONE WITH THE INTERNAL AUDITOR AND ONE WITH A PARISHIONER (BACK UP FOR THE CLERK). COPIES ARE NOT KEPT ON CLOUD STORAGE. ACCESS TO THE PERSONAL DATA IS LIMITED TO PUBLICATION OF DATA THAT IS A LEGAL REQUIREMENT, (MINUTES, ACCOUNTS ETC), INFORMATION THAT HAS TO BE SHARED WITH THE INTERNAL & EXTERNAL AUDITORS, & OTHER PARISH PERSONNEL - I.E. THE CHAIRMAN. ACCESS TO PERSONAL DATA IS BY APPOINTMENT ONLY WITH THE CLERK. THE CORRECTION OF PERSONAL DATA IS RECORDED IN THE MINUTES WHERE APPROPRIATE. PERSONAL DATA IS DELETED ALONG WITH THE DELETION OF DOCUMENTS ACCORDING TO THE SCHEDULE ISSUED BY YLCA. PERSONAL DATA OF ELECTORS WHO LEAVE THE PARISH IS DELETED WHEN THE CLERK IS DULY ADVISED.

THE PARISH MEETING HAS A PRIVACY NOTICE WHICH IS AVAILABLE BY PAPER COPY, BY ELECTRONIC INSPECTION, POSTED ON THE PARISH MEETING WEBPAGE OF THE LOCAL AUTHORITY'S WEBSITE AND AVAILABLE TO ALL WHOSE PERSONAL DATA IS HELD BY THE PARISH MEETING IN WHICH EVER FORM THEY REQUEST IT.

PERSONAL DATA COLLECTED FOR THE PURPOSE OF THE OFFICIAL BUSINESS OF THE PARISH MEETING IS ALSO USED FOR THE PURPOSE OF COMMUNICATING SOCIAL EVENTS & BUSINESS WITHIN THE PARISH AND FOR THE PURPOSE OF THE EFFECTIVE OPERATION OF THE OIL BUYING GROUP.

THE CLERK MAINTAINS AN ONGOING POLICY OF CHECKING THE ACCURACY OF THE PERSONAL DATA HELD BY THE PARISH MEETING AND UP-DATING/ALTERING IT ON AN ONGOING BASIS.

IN THE EVENT OF A DATA SECURITY BREACH OCCURRING THE CLERK WILL ADVISE ANY INDIVIDUALS AFFECTED BY THE BREACH, ALONG WITH THE DPO AND THE I.C.O WHERE APPROPRIATE. THE CLERK WILL THEN INITIATE REPAIRS TO THE SYSTEM AND REPLACE ANY DATA LOST.

IF SOMEONE ASKS FOR A COPY OF PERSONAL DATA THAT THE COUNCIL HOLDS, THEN THE CLERK WILL PROVIDE THEM WITH IT, IF IT IS ABOUT THEMSELVES. IF IT IS ABOUT A 3RD PARTY THE CLERK WOULD CONTACT THAT 3RD PARTY TO REQUEST PERMISSION FOR THEIR CONSENT TO PASS ON THE DATA. IF CONSENT IS REFUSED THEN THE CLERK WOULD NOT PASS ON THE DATA.

THE PARISH MEETING HAS AN INTERNAL RECORD OF THE CONSENTS GIVEN TO PERMIT THE PARISH MEETING TO USE THE DATA IT HOLDS FOR PROCESSING ACTIVITIES. (E.G. SENDING OUT MINUTES, DETAILS OF SOCIAL ACTIVITIES, ARRANGING THE GROUP OIL DELIVERIES)

## **PERSONAL DATA AUDIT (CONT.)**

ALL RELEVANT PARISH DATA HELD ON THE INTERNET IS COLLATED ON THE HIGH HOYLAND PARISH WEB PAGE OF THE BMBC WEBSITE. THE CLERK SUPPLIES COPIES OF THE AGREED MINUTES, ANY IMPERATIVE SCHEDULES AND DOCUMENTS FOR UPLOADING ONTO THE BMBC WEBSITE DIRECTLY WITH BMBC. IN SUPPLYING THIS INFORMATION AND DATA TO BMBC THE PARISH MEETING TRUSTS THE AUTHORITY TO APPLY ITS PRIVACY NOTICES AND POLICIES ON BEHALF OF THE PARISH MEETING.

THE PARISH MEETING HAS PRIVACY NOTICES AND PRIVACY POLICIES WHICH ARE AVAILABLE FOR INSPECTION ON THE PARISH WEBPAGE OF BMBC'S WEBSITE; ARE HELD FOR INSPECTION BY THE CLERK IN HER OFFICE, AND AT THE PARISH MEETINGS, AND HAVE BEEN CIRCULATED VIA E-MAIL TO THOSE WHO HAVE GIVEN PERMISSION TO RECEIVE IT.

THE CLERK HAS ATTENDED THE YORKSHIRE LOCAL COUNCILS ASSOCIATION TRAINING COURSE ON GENERAL DATA PROTECTION REGULATIONS. THIS INVOLVED INSTRUCTION ON PREPARING FOR THE INTRODUCTION OF GDPR AND ALL ITS IMPLICATIONS.

THE CLERK HAS RESPONSIBILITY FOR REVIEWING PERSONAL DATA FOR RELEVANCE, ACCURACY & KEEPING IT UP TO DATE. THIS IS AN ONGOING PROCESS, BUT WILL BE REVIEWED ANNUALLY ALONG WITH THE PARISH RISK ASSESSMENT & OTHER RELATED DOCUMENTS.

THE CLERK RETAINS AND ARCHIVES PERSONAL DATA. THE DATA IS RETAINED FOR THE PERIOD APPROPRIATE TO THE NATURE OF THE DATA AS PER THE SCHEDULE SUGGESTED BY THE YLCA, ADAPTED BY THE CLERK & ADOPTED BY THE PARISH MEETING & DELETED WHEN APPROPRIATE BY THE CLERK.

THE CLERK MONITORS (INTERCEPTS, BLOCKS, RECORDS AND ACCESSES) THE FOLLOWING SYSTEMS - COMPUTER NETWORKS AND CONNECTIONS, E-MAIL & INSTANT MESSAGING SYSTEMS, TELEPHONES, VOICEMAIL AND MOBILE PHONE RECORDS.

THE CLERK HAS SPOKEN TO PAUL NORRIS ONE OF THE ADVISORS AT THE ICO ON 23RD APRIL, 2018 AT 9.00 AM. SHE WORKED THROUGH A DOCUMENT & QUESTIONNAIRE WITH MR NORRIS & HE DETERMINED THROUGH THE RESPONSES GIVEN THAT HIGH HOYLAND PARISH MEETING WOULD NOT BE REQUIRED TO REGISTER WITH THE ICO NOR WOULD PAYMENT OF THE ANNUAL FEE TO THE ICO BE NECESSARY.