



AUDLEM PARISH COUNCIL PERSONAL DATA AUDIT QUESTIONNAIRE

- A. To be used to help councils with their record keeping obligations under the GDPR.
- B. This questionnaire is designed to help councils (and parish meetings) to audit their personal data. It is important that councillors and staff complete this form as comprehensively as possible. The purpose of a data audit is to find out what data the council is processing, what it is used for, where it is located and who has access to it. It is an important step in assessing whether there are any risks in the type of processing the council carries out. For example, if the council processes a large amount of sensitive personal data but has no access controls in place restricting who can see or use the data, that is a security risk which needs to be fixed. Without carrying out an audit a council may not know what risks it currently has with data.
- C. The generic phrase "council" has been used to refer to the data controller (see glossary below) using the questionnaire.
- D. Glossary
- **"Personal Data"** is any information about a living person which can identify them. This is not just someone's name and address but any information which can identify them (directly or indirectly). For example, a phone number or email address is personal data. Any other contact information or a person's employment history, or credit history are all personal data.
 - **"Data controller"** is the person or organisation who determines the how and what of data processing.
 - **"Data processor"** is the person or firm that processes the data on behalf of the controller.
 - **"Data subject"** is the person about whom personal data is processed.
 - **"Processing"** personal data means storing or deleting any personal data on a computer, database or some manual files (e.g. HR, allotment tenancy files or invoices with contractor payment details). The word 'processing' also covers selecting a name for a mailing list, or reading it off a screen during a call. It includes transferring and altering data. Indeed, practically anything done to personal data constitutes processing.
 - **"Sensitive personal data or special categories of personal data"** are any of the following types of personal data about a data subject: racial or ethnic origin; political opinions; religious beliefs; trade union membership; physical or mental health or condition; sexual life or orientation; genetic data; and biometric data.

Part A: YOUR INFORMATION		
1.	1. Person completing questionnaire a) Name. b) Role. c) Telephone number. d) Email.	a) Belen.Lopez Bloor b) Clerk c) 07432 332 857 d) parishcouncil@audlempc.co.uk
2.	Data controller (e.g. name of local council or parish meeting)	AUDLEM PARISH COUNCIL
3.	Date you completed this questionnaire	13 th May 2019, updated 12 th June 2020
Part B: COMMUNICATING PERSONAL DATA		
4.	This section relates to communications with councillors, staff and local residents (including mailing lists) general public. a) What type of personal data does the	<i>Staff: name, letter of application, interview notes,</i>

<p><u>council keep?</u> e.g. name, contact details such as bank details.</p> <p><u>b) Where does the council get the personal data from?</u> e.g. staff, residents, other local authorities, charities and sports clubs, community groups, recruitment agencies.</p> <p><u>c) Why does the council collect or process the data – what does the council do with the personal data?</u></p> <p><u>d) Who does the council disclose personal data to?</u> E.g. the public, councillors, staff and contractors carrying out the work of the council, pension providers, HMRC, credit reference agencies, recruitment agencies, prospective employers, occasionally with CEC with regard to a specific issue</p> <p><u>e) Do the council or parish meeting minutes contain personal data?</u></p> <p><u>f) Does the council ever send personal data overseas and if so where to and to which organisation? This might include overseas companies providing database or email services.</u> e.g. do any of your suppliers use 'cloud storage' and if so do you know where the personal data is located?</p>	<p><i>dob, references, NI number, address, bank details, phone number, email address. Appraisals, Salary info, holiday & absence records</i></p> <p><i>Councillors: original application (if co-opted), name, address, phone and email. Disclosure of interest form.</i></p> <p><i>CEC Councillors: name, email address and phone numbers</i></p> <p><i>Local residents: name, address, email address and phone number if contact has been made with regard to a specific issue. Electoral roll (Clerk access only)</i></p> <p><i>General public: name, address, email address and phone number if contact has been made by either side with regard to a specific issue</i></p> <p><i>Staff, residents, general public, CEC, various local and national groups and societies, local traders and suppliers</i></p> <p><i>For purposes relating to: local resident concerns, management of council assets, facilities, services and staff, contract management, performance of statutory functions including meeting transparency requirement for Parish Councils. Contact with local groups to respond to grant applications, requests for information, booking of meeting rooms. Contact with national charities or interest groups to facilitate Council activities (eg help with neighbourhood planning, biodiversity reports etc). Community surveys to gauge public opinion on a variety of issues.</i></p> <p><i>Councillors, staff and contractors carrying out the work of the council, payroll and pension providers, HMRC, prospective employers, occasionally with CEC with regard to a specific issue</i></p> <p><i>Yes. Names of Councillors ,and CEC Council employees.</i></p> <p><i>Shires our payroll service provider use a cloud-based payroll platform which is based in the EU (Ireland) and stored on Amazon web servers. The Council and its staff can access their protected website to retrieve payslips, P60, P45 etc, this overcomes potential email threats when emailing personal information back and forth.</i></p>
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	<p>g) Does the council collect any sensitive personal data? see definition above.</p> <p>h) If so for what reason? e.g. for safeguarding compliance; physical or mental health data relating to staff; racial and ethnic origin relating to equal opportunities monitoring.</p>	<p>Yes – for absence recording</p> <p><i>Health data relating to staff (as provided by them or their GP via a medical certificate) for absence recording and for processing sick pay</i></p>
Part C:		
5.	<p>About individuals or representatives of organisations which supply us with services such as for council repairs, or with whom we are in contact</p> <p>a) Who does the council keep personal data about?</p> <p>e.g. tradesman, recruitment agencies, surveyors, architects, builders, suppliers, advisers, payroll processors.</p> <p>b) What type of personal data does the council keep? e.g. name, contact details, qualifications, financial details, details of certificates and diplomas, education and skills.</p> <p>c) Where does the council get the data from?</p> <p>d) Why does the council collect or process the data?</p>	<p><i>Tradesmen, contractors, suppliers, contractors, advisors, payroll and pension processors</i></p> <p><i>Name, contact details, qualifications (if provided), vat reference numbers, company registration number, hourly rates and insurance details for tradesmen/contractors. Any other details of skills as required to identify the best person for a specific job. Bank details if individual or organisation requires payment by bank transfer, direct debit or standing orders,</i></p> <p><i>The individuals, suppliers, contractors etc themselves.</i></p> <p><i>Council asset and property maintenance and repairs and management of council facilities, pay/pensions, payment of invoices and management of Council services.</i></p>
Part D: GENERAL QUESTIONS ABOUT PERSONAL DATA		
6.	<p>a) How <u>does the council</u> store the personal data collected?</p> <p>b) <u>Does the council</u> take any steps to prevent unauthorised use of or access to personal data or against accidental loss, destruction or damage? If so, what?</p> <p>c) How <u>does the council</u> manage access to data?</p>	<p><i>Electronically on a laptop, on our Gmail account and in a paper filing system.</i></p> <p><i>Laptop is password protected. Only the Clerk, Chairman & Vice Chair have the password for disaster recovery purposes. Regular backups are undertaken onto two external hard drive. Paper records are kept securely in the Clerk's home or in a locked storage cabinet off-site at Tressiders Funeral Office on Shropshire Street..</i></p> <p><i>Only the Clerk and Chair have personal information about staff. Tradesman/contractor basic details are mainly in the public domain. All other information is protected as outlined in b) above. Any personal matters would be discussed under Part 2 of a meeting Agenda i.e. with the public and press excluded.</i></p>

	d) What is the process involved in giving access to staff or councillors?	<i>No other Councillor has access unless specifically granted by the full Council e.g. in the case of a grievance being raised by an employee or a complaint under the Complaints policy.</i>
7.	a) Do any procedures exist for e.g. correcting, deleting, restricting, personal data? If so, please provide details.	<i>Application forms and interview notes for Council positions are destroyed after six months. Other staff files are destroyed seven full tax years after employment ended.</i>
8.	a) Who has access to / is provided with the personal data (internally and externally)? b) Is there an authorisation procedure for accessing personal data? If so, please provide details.	<i>The Clerk and, for some personal data (e.g. relating to the Clerk) the Chairman. The payroll and pensions providers. HMRC. Not permitted except with the agreement of the full Council.</i>
9.	Does the council provide a copy of all existing privacy notices?	<i>Yes, these are available on Audlem Online.</i>
10.	So far as the council is aware, has any personal data which was gathered for one purpose been used for another purpose (e.g. communicating council news?) If so, please provide details.	<i>Possibly use of NP volunteers for other activities. They are being written to for their express permission to continue contacting them and provided with a copy of the Privacy Policy.</i>
11.	Does the council have any policies, processes or procedures to check the accuracy of personal data?	<i>No. We have to rely on the individual to notify us of any processing errors. We do require references for employment purposes.</i>
12.	a) In the event of a data security breach occurring, does the council have in place processes or procedures to be followed? b) What are these?	<i>Contained within other GDPR policies. A separate policy needs to be drawn up.</i>
13.	a) If someone asks for a copy of personal data that the council holds about them, i.e. they make a 'subject access request', is there a procedure for handling such a request? b) Is this procedure contained in a written document?	<i>YES – Freedom of Information policy along with other GDPR compliant policies. YES – Subject Access Request policy.</i>
14.	Does the council have an internal record of the consents which the council has relied upon for processing activities? e.g. to send council newsletters to residents	<i>No electronic distribution of Newsletters –this is by hand delivery to all dwellings and residents are happy to receive this.</i>
15.	a) Are cookies used on our council website? b) Does the council provide information about the cookies used and why they are used?	<i>Yes. Yes, the information can be found under http://www.audlem.org/privacy-policy.html</i>

	<p>c) Does the council keep a record of the consents provided by users to the cookies?</p> <p>Does the council allow individuals to refuse to give consent?</p>	<p>There is no record of the consents provided by users to the cookie policy.</p> <p>Yes</p>
16.	Does the council have website privacy notices and privacy policies?	<i>We have our own privacy policy. As the website is not under our control do we require additional website privacy notices.</i>
17.	<p>What data protection training do staff (e.g. council administrator, hall bookings secretary) and councillors receive?</p> <p>What does the training involve?</p>	<p><i>The Parish Clerk attended GDPR training on 18th April 2018. The ChALC GDPR Toolkit has also be circulated to all Councillors to make them aware of requirements. As at July 2018 ChALC are not planning on running any further training courses but we have asked them to notify us if this changes.</i></p> <p><i>3 hour training course covering GDPR and Data Protection compliance for Parish Councils.</i></p> <p><i>The Parish Clerks receives regular updates from ICO newsletter.</i></p>
18.	<p>a) What does the council do about archiving, retention or deletion of personal data?</p> <p>b) How long is personal data kept before being destroyed or archived?</p> <p>c) Who authorises destruction and archiving?</p>	<p><i>Our retention policy informs this.</i></p> <p><i>Our retention policy informs this.</i></p> <p><i>The Clerk, as per policy</i></p>
Part E MONITORING		
19.	<p>a) Please identify any monitoring of the following systems that takes place. 'Monitoring' includes all monitoring of systems including intercepting, blocking, recording or otherwise accessing systems whether on a full-time or occasional basis. The systems are:</p> <p>(i) computer networks and connections.</p> <p>(ii) CCTV and access control systems.</p> <p>(iii) communications systems (e.g. intercom, public address systems, radios, walkie-talkies)</p> <p>(iv) remote access systems</p> <p>(v) email and instant messaging system</p> <p>(vi) telephones, voicemail, mobile phone records.</p>	<p><i>CLERK, CHAIR in extremis, outside IT contractors if repair or maintenance required.</i></p> <p><i>Police, supplier, maintenance contract provider</i></p> <p><i>n/a</i></p> <p><i>n/a</i></p> <p><i>Clerk, Chair in extremis/holidays. Outside IT contractors if repair or maintenance required.</i></p> <p><i>Only the Clerk has a mobile phone. Only the Clerk and Chair (in extremis/holidays) has access</i></p>

	(vii) Does the council have notices, policies or procedures relevant to this monitoring?	<i>CCTV policy</i>
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This Personal Audit Questionnaire is fully supported by all Members of Audlem Parish Council. It was reviewed and adopted at the Audlem Parish Council Meeting held on:

Date: 15th June 2020

Signed: Steve Boyes (Chairman/Vice-Chairman)

Signed: Belen Lopez Bloor (Proper Officer)

Original signed copy held on file by the Parish Clerk.