

BARTON MILLS PARISH DATA AUDIT AND RISK MANAGEMENT POLICY

Getting ready for GDPR

Review all your databases, email lists, spreadsheets, paper documents and other lists of personal data. If there are any issues, identify what you need to do. If action is not clear, then highlight questions needing further insight. New consent forms, privacy notices, and new or revised policies or procedures may need to be implemented to ensure compliance with GDPR.

Description	Why is the data held and what is it used for	Basis for processing data (e.g. consent, legal obligation etc)	Who holds the data and who can access it?	What security controls are in place?	How long is data kept for?	Is this covered by our privacy notice?	ACTION REQUIRED
DATA AUDIT							
Clerk personal and financial info	For employment purposes	Legal obligation of contract	Clerk, chairman SALC & HMRC	Kept within Clerks and/or Chairmans home. SALC and HMRC	Personal finance –minimum of 7 years. Records of payments to clerk - indefinitely	Yes (councillors & clerk)	Consent form
Councillors declaration of interest	Statutory requirement	Legal obligation	Clerk & WS Council	Kept within Clerks home or at WS Council	To be held for term only by PC (as stated by FHDC)	Yes (councillors & clerk)	Consent form
Parishioners personal data on personal matters	In order to deal with said matter	As requested by the individual	Clerk but may be publicised if consented	Kept within Clerks home and/or councillors personal email accounts	Indefinitely	Yes (public)	Consent form
RISK MANAGEMENT							
Data held on paper	As detailed above	As detailed above	Clerk and/or councillors' home	Kept in a locked private home out of view of the front of the property	As detailed above	Yes	None

Data held electronically	As detailed above	As detailed above	Clerk and/or councillors' home	Stored on password protected devices, Data held by clerk and Cllr R Lewis only. Data backed up weekly to a cloud storage which can be accessed by clerk & chairman	As detailed above	Yes	None
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