

West Swindon Parish Council

Data Protection Impact Assessment

Submitting controller details

Name of controller	Paula Harrison
Subject/title of DPO	Parish Clerk and RFO
Name of controller contact /DPO (delete as appropriate)	Paula Harrison

Step 1: Identify the need for a DPIA

Explain broadly what project aims to achieve and what type of processing it involves. You may find it helpful to refer or link to other documents, such as a project proposal. Summarise why you identified the need for a DPIA.

The Identified need for a DPIA came from a recommendation from Auditing Solutions Ltd during an internal audit review 2023..

This Data Protection Impact Assessment (DPIA) is designed to identify risks arising out of the processing of personal data and to minimise these risks as far and as early as possible as well as demonstrating compliance with GDPR in order to avoid sanctions. It will also inspire confidence in the public by improving communication about Data Protection Issues, and makes sure users are not at risk of their data protection rights being violated.

West Swindon Parish Council is a medium sized Parish Council the purpose of this DPIA is for the general day to day running. The Parish Council has one building – Unit 25 Westmead Industrial Estate incorporating the office and depot.

Step 2: Describe the processing

Describe the nature of the processing: how will you collect, use, store and delete data? What is the source of the data? Will you be sharing data with anyone? You might find it useful to refer to a flow diagram or other way of describing data flows. What types of processing identified as likely high risk are involved?

Processing means taking any action with someone's Personal Data e.g. Name, Address, Photographs, Medical Information. This begins when a data controller starts making a record of information about someone and continues until you no longer need the information and it's been securely destroyed. If you hold information on someone, it counts as processing even if you don't do anything else with it. Other types of data processing include actions such as organising and restructuring the way you save the data, making changes to it e.g. Updating someone's address or record and sharing it or passing it to others. (Taken from The Information Commissioner's Office (ICO) under section for Advice to small organisations.

For West Swindon Parish Council -

Name and address, email address and phone number details of the 15 councillors plus Parish Clerk are stored on Parish Laptop. 11 Councillors claim an allowance and payment banking and HMRC details are recorded for that purpose.

Details of other members of the public are stored during correspondence and are deleted when query has been completed. Non personal address details may be held as part of mapping and grounds maintenance history.

Details updated or deleted as appropriate following elections or resignations.

Describe the scope of the processing: what is the nature of the data, and does it include special category or criminal offence data? How much data will you be collecting and using? How often? How long will you keep it? How many individuals are affected? What geographical area does it cover?

Name and address email and phone numbers of the councillors plus Parish Clerk are stored on a single laptop. The Parish Clerk manages access through the administration of the Microsoft account.

There are no special categories or criminal offence data stored of the Parish Councillors.

Details of other members of the public are stored during correspondence and are deleted when query has been completed.

Details updated or deleted as appropriate following elections or resignations.

Area is within three miles from the parish boundary.

Describe the context of the processing: what is the nature of your relationship with the individuals? How much control will they have? Would they expect you to use their data in this way? Do they include children or other vulnerable groups? Are there prior concerns over this type of processing or security flaws? Is it novel in any way? What is the current state of technology in this area? Are there any current issues of public concern that you should factor in? Are you signed up to any approved code of conduct or certification scheme (once any have been approved)?

Relationship: Parish Councillors, they can request that their contact details are not published on the Councils Website.

Children are not involved as you have to be at least 18 year old to be a Parish Councillor. West Swindon Parish Council welcome anyone who is interested in becoming a Councillor, if they require additional assistance to enable them to be a Councillor this would be provided.

Councillors Code of Conduct is in place and was last updated and agreed by the Parish Councillors at a Council Meeting on 22nd May 2023.

All office staff work from a laptop which is purely for the use of Parish Council business, it is backed up daily and a secure password system is in place. There is mapping data and contact information held on a cloud-based one drive which is password protected for access by named employees.

Individual residents who make contact with the Parish Council would expect to have a response. Details of issues on an address basis are retained for the purpose of insurance queries and ongoing maintenance. Personal contacts of residents is not required to be held once the original request or complaint has been resolved.

Information is held for volunteers – this is email and address and is for the purpose of providing information regarding health and safety procedures and for insurance purposes. Contact details will be removed 3 months after a volunteer is no longer active. Names and addresses on group registers will be retained in case there is an insurance claim.

The Parish Council has CCTV monitoring for its premises that is for security purposes only and does not monitor public land, footways or residential properties. CCTV is detailed in the Council's CCTV policy.

Describe the purposes of the processing: what do you want to achieve? What is the intended effect on individuals? What are the benefits of the processing – for you, and more broadly?

The Parish office needs to make contact on a regular basis with all fifteen Councillors for the distribution of Council information and reports and papers.

The Parish office needs to make contact with volunteers on an occasional basis to update on relevant information, replace out of date kit or liaise over projects. Personal contact details will be held whilst the person is active.

The Parish office does not need to retain personal data of complainants or requests for service. Once an issue is resolved personal contact details will be deleted from electronic communication/storage.

Step 3: Consultation process

Consider how to consult with relevant stakeholders: describe when and how you will seek individuals' views – or justify why it's not appropriate to do so. Who else do you need to involve within your organisation? Do you need to ask your processors to assist? Do you plan to consult information security experts, or any other experts?

Residents will contact the Parish office from time to time with issues they may wish to have raised or raised themselves at a meeting, once the issue has been discussed and resolved etc all communication regarding the matter if via email is deleted, although less likely to be via letter, the correspondence is shredded and disposed of appropriately. Requests for service submitted via the Parish Council website constitutes the majority of contact enquiries, personal details are deleted after the issue has been responded to.

Any consultation regarding matters such as Neighbourhood Plan, community growing project or similar local consultations, if questionnaires are sent out to residents they are asked their views, no personal data is required or collected.

Step 4: Assess necessity and proportionality

Describe compliance and proportionality measures, in particular: what is your lawful basis for processing? Does the processing actually achieve your purpose? Is there another way to achieve the same outcome? How will you prevent function creep? How will you ensure data quality and data minimisation? What information will you give individuals? How will you help to support their rights? What measures do you take to ensure processors comply? How do you safeguard any international transfers?

Data quality and data minimisation is ensured as only relevant information is collected from the Parish Councillors and volunteers and retained only for as long as is necessary or for the period they stand as a Councillor, if they resign or cease to be active, data is removed / deleted immediately. Financial information will be retained for the relevant period required.

Data relating to other persons such as residents is not retained and any relevant information held in line with the Document Retention policy

Personal information relating to staff is held for the purposes required by the employer.

Step 5: Identify and assess risks

Describe source of risk and nature of potential impact on individuals. Include associated compliance and corporate risks as necessary.	Likelihood of harm	Severity of harm	Overall risk
<p>Data Breach of personal information. (Names and Addresses, email and phone numbers) of Clerk/ RFO and Parish Councillors and members of the public from time and time.</p> <p>Data breach of personal information of volunteers.</p> <p>Data breach of personal information of staff.</p>	<p>Remote, possible or probable</p> <p>Remote</p> <p>Remote</p> <p>Remote</p>	<p>Minimal, significant or severe</p> <p>Minimal</p> <p>Minimal</p> <p>Minimal</p>	<p>Low, medium or high</p> <p>Low</p> <p>Low</p> <p>Low</p>

Step 6: Identify measures to reduce risk

Identify additional measures you could take to reduce or eliminate risks identified as medium or high risk in step 5

Risk	Options to reduce or eliminate risk	Effect on risk	Residual risk	Measure approved
Loss of Councillors and members of the public Personal Data including Register of Interest Forms, volunteer registers, and staff information	Office staff work within a secure office environment. The office is locked and alarmed out of hours. All laptops are password protected. Register of Interest Forms, volunteer registers, staff details are in paper form, these are kept in a locked filing cabinet. Paper documents will be shredded before disposal.	Eliminated reduced accepted	Low medium high	Yes/no
		Reduced	Low	yes
		Reduced	Low	yes

Step 7: Sign off and record outcomes

Item	Name/position/date	Notes
Measures approved by:		Integrate actions back into project plan, with date and responsibility for completion
Residual risks approved by:		If accepting any residual high risk, consult the ICO before going ahead
DPO advice provided: N/A		DPO should advise on compliance, step 6 measures and whether processing can proceed
<p>Summary of DPO advice:</p> <p>Do Parish Councils need a Data Protection Officer – Section 7(3) of the DPA 2018 say that Parish Councils are not public authorities for the purposes of the GDPR. Therefore they do not need to appoint a Data Protection Officer (DPO) 8th March 2023.</p> <p>West Swindon Parish Council pays an annual subscription to the Information Commissioners Office Reference Number ZA462934</p>		
DPO advice accepted or overruled by:		If overruled, you must explain your reasons
Comments: N/A		
Consultation responses reviewed by:		If your decision departs from individuals' views, you must explain your reasons
Comments: N/A		
This DPIA will be kept	Paula Harrison Clerk/ RFO	The DPO should also review
under review by:		ongoing compliance with DPIA