

**GENERAL POLICY 26 - DATA AUDIT FOR BLABY PARISH COUNCIL**

What Data is held?	Where did data come from?	*Is the data sensitive?	Has there been positive unambiguous consent? (i.e. opt-in consent)	Why is it kept?	What is the legal basis for keeping it?	How long will the data be kept and is it kept securely?	Is there a procedure for checking data accuracy?	Will the data be shared with anyone?	If the data is shared has the external source confirmed its security procedures?	If the data is of high risk to individuals is a further Data Impact Assessment required?
Maintenance contractor's bank details and qualifications	Contractor	No	No	To enable payment	Contractual necessity	Locked in cabinet until contract ends	Yes – annual	No	NA	NA
Payroll provider bank details	Individual	No	No	To enable payment	Contractual necessity	Locked in cabinet until contract ends	Yes - annual	No	NA	NA
Photos on the council website	Individual	No	Yes (see consent form).	Publicity	Consent	Will be deleted from password protected website in 6 months	NA	No	NA	NA

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Councillors' names, addresses	Individual Councillors	No	No. Consent is not an appropriate legal basis to process personal data for staff or councillors	Communication	Legal obligation (discharge of council's statutory functions and powers)	Password protected until end of term	Yes – annually	No	NA	NA
Names and contact details of council volunteers	Individual	No	Yes (see consent form)	Communication	Consent  Legal obligation (discharge of council's statutory functions and powers)	Password protected until resignation	Yes – annually	No	NA	NA

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Newsletter mailing lists	Individual	No	Yes	Communication	Consent	Password protected	Yes – annual request for information to be verified if appropriate	No	NA	NA
Contact details of current allotment plot holders	Tenant	No	No	Communication to collect rents	Performance of contract  Legal obligation  (discharge of council's statutory functions and powers)	Until plot relinquished	Annually on payment of rent	No	NA	NA

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Contact details of residents on the allotment waiting list	Prospective tenants	No	No	To keep a record of demand	Legal obligation (discharge of council's statutory functions and powers)	Until allocated a plot.	No – checked on plot allocation	No	NA	NA
Employee details	Employee	Yes	No - consent is not an appropriate legal basis to process personal data for staff or councillors	Necessary for office administration	Legal obligation - comply with employment and equality law/ report to HMRC  Performance of contract	Password protected and kept until employee leaves post.	Yes at annual appraisal	Payroll provider/ HMRC	Yes in writing dated 24.5.18	No

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Name and addresses of burial plot owners	Deceased's relatives	No	No	To maintain complete burial records	Legal obligation (discharge of council's statutory functions and powers)	Indefinitely – data kept in hard copy registers in locked filing cabinet.	Circulate written request to inform us of updated contact details with Exclusive Right of Burial	No	NA	NA
Details of other Councils	Other councils	No	No	To enable contact with other councils	No legal obligation, but required for performance of duties	Indefinitely	Confirmed by other authorities	No	NA	NA
Details of Businesses who let rooms	Business	No	No	To allow contact	Legal obligation Performance of contract	Until business leaves premises	Confirmed with business	No	NA	NA

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Details of room hirers	From hirer	No	No	To allow contact	No legal obligation but required for contact	While hirer uses premises	Confirmed with hirer	No	NA	NA
LRALC										
Pension company - LCC	Employer	Yes	Yes	Necessary for office admin	Legal obligation	Password protected and kept until employee leaves post	Yes – internal auditor	Pension & payroll provider and HMRC	Yes	No

\*e.g. racial or ethnic origin; political opinions; sexual orientation; religious beliefs; trade union membership; physical or mental health or condition; sexual life or orientation; genetic data; and biometric data.

Reviewed Yearly, Last Reviewed November 2019