

PALISTOW AND IFOLD PARISH COUNCIL DATA AUDIT JUNE 2024

ACTIVITY	DATA HELD	HOW STORED	CAN THIS BE IMPROVED UPON	FURTHER RESOURCES NEEDED	RISK ASSOCIATED WITH NO ACTION	AUDITOR RESPONSE- Clerk's comments in red
Website	Community page advertises community leaders contact details for instance History page	Online	Disclaimer that contact details displayed at individuals own risk. Determine:- when would advertiser be told this and what record would PC have that they had understood and agreed to the risk.	All advertisers current and future to sign a document agreeing to risk. PC would need an appropriately worded document and would this be legally sufficient for GDPR. Confirm with the auditor.	LOW	A website privacy policy would normally cover GDPR requirements. Privacy Policy on July 2024 agenda.
Email circulation list register/ contact lists.	Names and addresses of subscribers to PC Newsletter kept by PC	Kept on laptop file. Laptop is password protected	List could be password protected incase of breach of laptop security. Emails always sent out BCC to protect email address.	Confirm with the auditor.	LOW	Laptop should be encrypted, which will be the case if using Windows 11. YES
Employees	Contact details of current and past (previous only) employees held. No PAYE/PENSION details retained nor history of employment appraisals etc	Kept on password protected Laptop	Security sufficient	Confirm with the auditor.	LOW	As above YES
Working Groups	Contact details of community representatives on working groups held on laptop	Password protected Laptop.	In some cases community representative has a designated email to protect personal email but not all cases. Personal emails only used when correspondence is internal however and not in the public domain.	Working Group Community representative should be appraised of this action to protect their emails and they should confirm they are happy with these measures. Review to occur. Confirm with the auditor.	LOW	Satswana support the use of personal emails since few volunteers have either the appetite or skills to manage multiple iterations. NOTED
Supplier details	Suppliers details held on laptop	Password protected laptop.	Supplier name should not be used on agendas and minutes if possible especially when comparing quotes incase of fault finding by public or release of commercially sensitive information although this information may be available under FOI in some cases.	To be born in mind when producing agendas and minutes and a review of draft documents by Clerk and Councillors alike to ensure this occurs. Confirm with the auditor.	LOW	Suppliers are not normally considered to be personal data under GDPR. NOTED
Resident correspondence	Emails or hard copy	Emails on outlook hard copies in office files.	Scan any hard copies to PC laptop files. Laptop is password protected. Keep up to date with the document retention policy.	Retention policy to be reviewed July PC meeting. Confirm with the auditor.	LOW	Recommend review of retention with IRMS policy. Retention of documents scheme to be adopted at July 2024 meeting.

Councillors	Contact details of Councillors kept on password protected laptop and phone. Registers of Interest redacted for sensitive information.	Councillors use own devices but specific password protected email accounts.	Ensure Councillors use password protected devices for communications	Confirm with the auditor.	LOW	Satswana recommend minimum use of multiple communication methods. Stick to Councillor email accounts. NOTED
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