

SHAUGH PRIOR PARISH COUNCIL

GENERAL DATA PROTECTION REGULATIONS ACTION PLAN

The General Data Protection Regulation (“GDPR”) will take effect in the UK from 25 May 2018. It replaces the existing law on data protection (the Data Protection Act 1998) and gives individuals more rights and protection regarding how their personal data is used by councils. Local councils and parish meetings must comply with its requirements, just like any other organisation.

The GDPR applies to all local councils and also to a parish meeting without a separate parish council because a local council and a parish meeting are public authorities.

This plan sets out what activities will take place to ensure compliance with the GDPR and, where appropriate, the timeline for such.

Raise Awareness

Councillors, staff and volunteers are to be made aware that the law is changing and will therefore be required to undergo appropriate training and records are kept.

To be completed by September 2018

Decide who will be responsible for the Council’s compliance with data protection law

Whilst the Clerk will take the lead in respect of putting necessary arrangements in place, all Councillors, staff, committees and sub-committees are expected to apply data legislation to their work.

On-going

Data Audit

Undertake a full review of personal data held on staff and volunteers, people using Council facilities or services, councillors, contractors, residents and more. This will be documented and Shaugh Prior Parish Council will keep records of all processing activities.

To be completed by July 2018

Identify and document your ‘lawful basis’ for processing data

The council must identify the lawful basis required in order to legally process data under the GDPR. There are a number of different criteria that give lawful basis to process and different lawful basis gives different rights to individuals. This shall be determined and included as part of the Data Audit.

To be completed by July 2018

Check your processes meet individuals' new rights

The GDPR will give people more rights over their data. Shaugh Prior Parish Council will ensure that the necessary systems are in place to be able to deliver the 8 rights.

To be completed by September 2018

Processes for dealing with 'Subject Access Requests'

Individuals have the right to know what data you hold on them, why the data is being processed and whether it will be given to any third party. They have the right to be given this request as a 'hard copy' and is known as a 'subject access request' or SAR. Processes will be put in place in order to be able to identify a SAR, find all the relevant data and respond within one month of receipt of the request. Under GDPR the time limit for responding to an SAR is reduced to 40 days.

To be completed by October 2018

Review how we get consent to use personal data

If we rely on consent as our lawful basis for processing personal data then we need to review how we seek and manage consent. Should they be required, consent forms will need to be produced.

To be completed by September 2018

Update our Policies and Notices

We must have clear, practical policies and procedures for Councillors and staff to follow and monitor their operation.

To be completed by September 2018

Privacy Notices

We must tell people in a concise, easy to understand way how we use their data. Should they be required, privacy notices will need to be produced.

To be completed by September 2018

Data Retention & Disposal

Create a new data retention policy and inform all data subjects on how long you will retain data. Determine whether or not data is still required and if not whether it should be destroyed.

To be completed by September 2018

Websites

Suitable control should be in place to access any restricted areas. Make sure we are allowed to publish personal data (including images) on website/social media.

To be completed by September 2018

Data Sharing

Ensure permissions are in place to allow the sharing of personal data with others and make sure it is kept secure when shared.

To be completed September 2018

CCTV (if applicable)

Inform people what it is used for and review retention periods.

To be completed by September 2018

Training

Train staff on the basics of personal data security, where the law and good practice need to be considered and know where to obtain advice.

To be completed by September 2018

Build in extra protection for children

The GDPR says children under 16 cannot give consent (although this will be reduced to 13 in the UK) so we will have to obtain consent from a parent or guardian.

To be completed by October 2018

Update your contracts to deal with processing by others

Recognise when others are processing personal data for the Council and make sure measures are in place to ensure they do this securely. Identify existing contracts and ensure the correct GDPR obligations are included. Ensure any new contract with suppliers includes the necessary obligations relating to the processing of information.

To be completed by October 2018

Personal Data Breaches

Ensure the correct procedures are in place to detect, investigate and report a data breach. Councillors, staff, contractors and the Councils data processors should be briefed on personal data breach avoidance and on what to do in the event that a breach occurs.

To be completed by September 2018

Build data protection into your new projects

Privacy by design means building data protection into all new projects and services. Data protection impact assessments should be undertaken where new technology is being deployed.

To be completed by October 2018

Appointment of a Data Protection Officer

Current guidance provided suggest that Parish Council's would not require a Data Protection Officer. Further clarification will be sought on this requirement.

To be completed by July 2018

Approved by SPPC

Date.. 06.06.2018

Signed.. 

Min Ref.. 65/18