

## GENERAL DATA PROTECTION REGULATIONS

### DATA AUDIT REPORT - UPDATE ON PROGRESS MADE

The data mapping exercise was carried out in May 2018 by Maureen Chaffe of Process Matters2 she made the following recommendations the Parish Councils responses are listed below for each action required:

1. An IT security policy and Data Protection Policy needs to be adopted and signed by all staff and councillors. This needs to be part of an adopted induction programme. [The Parish Council are due to review and adopt the IT Security Policy and Data Protection policy on 11<sup>th</sup> September 2018. - Adopted](#)

[Information Security Incident Policy for review and adoption at meeting on 6<sup>th</sup> November 2018](#)

2. A data retention policy needs to be adopted to ensure that future data is kept only for as long as necessary to fulfil the purpose for which it was collected. Paper information should be "culled" and where retention can no longer be justified it should be shredded. If it needs to be retained it would be advantageous for the Council to consider scanning back copies where possible and going forward to stop filing paper copies and hold them online. This will improve security and resilience. Booking forms need to be culled to remove old ones. [The Parish Council has a Data Retention Policy in place, but this needs to be updated to comply with the changes, the Clerk will work on this at the earliest opportunity.](#) The Clerk has drafted a data retention policy and is currently using it to ensure that the policy is fit for purpose prior to adoption.

[At its meeting on 3<sup>rd</sup> July 2018 the Clerk requested that all councillors review their data and delete any files that are unnecessary, it was agreed that only the Clerks data would be migrated to the new system. It was noted that all councillors were already provided with a parish council email address although some councillors do not current use this address, this will be changed when the new item system is in place. The Clerk has been working through the email account and memory sticks. The computer files need to be reviews, followed by the paper files. It was noted that the Clerk regularly submitted minutes etc. to the County Council records for archive storage.](#)

[The Clerk's data has been transferred to One Drive and the clerk is in the process of transferring the permanent data to SharePoint Files. Going forward all files will](#)

be in SharePoint. The Clerk and the Chairman are happy to provide one-to-one training on SharePoint to anyone who would like to receive it or we can run a training event at the village centre.

3. A review of IT Security needs to be carried out to establish the current baseline. A full report of how the IT security, patch management and data storage are undertaken must be provided. **This needs to be undertaken.**  
The Clerk is currently investigating Sophos to manage security for all devices to ensure that the Parish Council cloud is not corrupted.
4. To ensure data security and continuity Microsoft Office 365 and Sharepoint should be implemented across the organisation with all councillors having an email address that belongs to the Council. It is further suggested that any IT contract assists the Council with a five year rolling IT replacement plan to ensure that the IT remains up to date and compliant. **At its meeting on 3<sup>rd</sup> July 2018, the Parish Council resolved to instruct Horizon Digital Ltd to provide the parish council with IT Support including the provision of a new laptop for the Parish Clerk. The new laptop has been purchased and set up by Horizon Digital. The order has been placed for 1x Microsoft Office 365 Business and 10x Microsoft Office 356 essentials, including one licence to be provided for the hall booking secretary.**

The deadline for transfer to Office 365 has now passed confirmation required from Cllrs. Chivers, Stephens and the booking secretary that the transfer to parish council email address has been completed. The Clerk is able to provide assistance if required. From 13<sup>th</sup> November only parish council emails will be used.

5. The website needs to be updated to include a privacy policy relating to GDPR (the current one is not fit for this purpose) and a DSA request notice. It is further recommended, although not part of GDPR review that the PC uses its website as its Freedom of Information Publication Scheme. **The replacement privacy policy was adopted at the meeting on 3<sup>rd</sup> July 2018. The policy and the Data Sharing Agreement request notice have been uploaded to the GDPR page on the website. Matter completed,**
6. Data Sharing Agreements should be put in place between the Parish Council and all external agencies who access data such as the payroll provider. **The Data Sharing Agreement issued by West Sussex County Council as the pension provider was signed by the Parish Council on 3<sup>rd</sup> July 2018 and has been adopted by West Sussex Council.**

The clerk has issued the Data Sharing Agreement to the website/email provider, village hall booking secretary, IT support provider and the payroll provider. The

payroll provider has signed and returned both copies this will be adopted by the Parish Council at its meeting on 11<sup>th</sup> September 2018. All other agreement currently outstanding.

Pension fund provider - completed

Booking Secretary - outstanding

Website provider - outstanding

Payroll provider - completed

#### **Data Audit Report May 2018**

Date of review 4<sup>th</sup> September completed by Louise Chater

Date of review 30<sup>th</sup> October completed by Louise Chater