



Company registered number 09329065 [www.satswana.com](http://www.satswana.com)

## **Impact Assessment for Ashurst Parish Council**

Present, Elizabeth Leggo, Clerk to the Council, plus Chas Hammond Chair of Parish Council and Charlotte Smith for Satswana.

### **1 Outline**

Ashurst Parish Council is a small rural Parish Council, covering the parish of Ashurst in the Horsham District of West Sussex. Elections are held every four years. Ashurst Parish Council has 7 councillors who meet regularly to make decisions on the work and direction of the council. Ashurst Parish Councillors do not receive any salary but contribute a great deal of their time and energy to ensure the smooth running of the community.

### **2 Quick Read, the main points**

The Council is very competently managed by a Clerk with a strong awareness of compliance who had already given effect to many thoughts and requirements for change. She is supported by a technically aware Chairman who similarly did not need to be told what was required. It was noted that archives had already been transferred to long term storage, for instance. As with every such example of historic management, there is opportunity to increase the use of digital as opposed to paper forms, and encryption can be embraced. The Parish is registered with the Information Commissioners Office.

### **3 Personal data kept or processed**

The Clerk considered the "Discovery" document and identified that the following data is stored;

#### **a) Councillor Contact Details**

It was considered that these were required in order for the Clerk to fulfil her duties; the information is collected for your specific legitimate interest.

#### **b) Councillor declaration of interest**

It was noted that these are available on the website. This is a requirement, and they are also available on the District Council website.



Company registered number 09329065 [www.satswana.com](http://www.satswana.com)

**c) Employment and recruitment records**

These are locally held in paper form. Future records will be digitalised for greater security. The Payroll is processed by the Clerk using HMRC PAYE Tools. Mulberry & Co are retained as the Local Authority auditor and will require Processor agreements.

**d) Minutes of Meetings**

Archives have already been moved to West Sussex County Archives. Current minutes should be subject to your retention policy on site before being moved to archive.

**e) Correspondence / emails with individual local residents**

Everything is passed through the Clerk and under their control. Information that is passed on is redacted where appropriate to remove identifiable data. Hardware and storage data are encrypted so that the content of any message remains in the possession and under the control of the Clerk. The email then only advises the existence of the content and it is examined centrally with a logged record of access.

**f) Arrangements with volunteers**

Records are kept to allow the Council to contact volunteers providing services to the Parish when needed and in order to maintain appropriate insurance.

**g) Users of the recreation ground**

The Clerk has the contact details stored on an encrypted computer. Contracts and invoices are stored digitally on an encrypted computer.

**h) Users of the Pavilion**

As above – for users of the Recreation Ground.

**i) Contracts with individuals**

Service and work agreements with individual persons are stored digitally, and on paper in accordance with our retention policy.

**j) Contracts with Companies/Charities**

Service and work agreements with Companies and Charities are stored digitally, and on paper in accordance with our retention policy.



Company registered number 09329065 [www.satswana.com](http://www.satswana.com)

**k) Bank details of contractors / suppliers**

Bank details of contractors or suppliers are on paper and are stored in accordance with our retention policy.

**l) Trading Licensees**

n/a

**m) Electoral Register**

It was noted that a copy of the Electoral Register is held, but this is the responsibility of the District Council and no public access to it can be granted by the Clerk.

**n) Complaints to the Parish Council**

Paper records of complaints to the Council would be held for a period of two years before being shredded. Electronic complaints would be stored digitally on an encrypted computer for 2 years. There are currently none. Once disposed of, the only record that would be kept would be a note that a complaint was made, not the detail.

**o) Freedom of Information requests**

There is a statutory obligation to respond to requests, but once again it is recommended that these be stored and responded to in a digital rather than paper form. Any Councillor who retains a personal email account could be subject to having to disclose private details in the event of a FOI request.

**p) Communications with other local authorities**

Essential communications with other Local Authorities such as Horsham District Council, West Sussex County Council, SSALC & NALC are stored on an encrypted computer. A document collaboration medium was suggested.

**q) Communications with third parties**

Any legal firm involved or engaged must enter into a processor contract where data that is collected by the Controller is passed or shared with another entity. The records should be digitised and encrypted since the information may well be of a sensitive nature. Insurers (due to change on 1 June 2018), and Maintenance Contractors, will be contacted.



Company registered number 09329065 [www.satswana.com](http://www.satswana.com)

**r) Legal proceedings or transactions with individuals**

Any legal firm involved or engaged must enter into a processor contract where data that is collected by the Controller is passed or shared with another entity. The records should be digitised and encrypted since the information may well be of a sensitive nature.

**s) Individual identified in the emergency plan**

Records are kept to allow the Council to contact individuals providing services to the Parish when needed and in order to maintain appropriate insurance. They are not on the website. Only councillors are listed on the website.

**t) Local Planning Applications**

Plans are examined on the Horsham District Council website using online access. Paper plans are not retained by Ashurst Parish Council.

**u) Historical Parish Records**

Personal data does not apply to deceased persons. Information is archived securely.

**v) General Communications**

All emails are sent with the following message;

‘This email and any attachments to it may be privileged and confidential and are intended solely for the use of the individual to whom it is addressed. If you are not the intended recipient of this email, you must neither take any action based upon its contents, nor copy or show it to anyone. Please contact the sender if you believe you have received this email in error or respond with “WRONG RECIPIENT” in the subject line.

Although Ashurst Parish Council has taken reasonable precautions to ensure no viruses are present in this email, the Council cannot accept responsibility for any loss or damage arising from the use of this email or attachments.’

All Councillors use dedicated email addresses to retain control of content.

It was noted that the Council used Office 365 and it was suggested that you consider the use of Sharepoint as a collaborative tool to retain control of content that might otherwise be distributed by email, use the email solely as a prompt.



Company registered number 09329065 [www.satswana.com](http://www.satswana.com)

#### **4 Publications produced**

##### **a) Minutes and Agendas**

These are available on the public website. Please note that any papers distributed are shredded after the meeting, they are not retained by Councillors.

##### **b) Standing Orders and Financial Regulations**

These are stored digitally but there are no security connotations.

##### **c) Notices, surveys, newsletters**

To include end of year accounts, dates of Parish meetings and the Asset Register. There are no security connotations. The Parish Council distributes news via its website and parish magazines. There are no security connotations.

#### **5 Policies**

It was noted that the Parish maintained a range of policies regarding Retention, Privacy, Codes of Conduct etc. and that these public policies are available on the website.

#### **6 Website**

The website is maintained by Yola who have access to data on the site. It was recommended that the website is HTTPS. A Processor Agreement is being requested.

#### **7 Shredding**

The Parish Council has a shredder. The shredding of data is recommended as good practise.

#### **8 Retention Policy**

The Parish Council has adopted a retention policy for all paper, and six years for accounts, as required by statute.

#### **9 Backup**

All data is stored on an encrypted storage device.



Company registered number 09329065 [www.satswana.com](http://www.satswana.com)

## **10 Action if you are breached**

If it becomes aware of a breach the Parish Council will contact Satswana immediately by phone and/or email and they will report the breach to the ICO on our behalf as well as taking action to assist us to remediate the issue. The Parish Council will maintain a record of any such breaches.

## **11 Password policy**

The Parish Council operates a policy whereby its password are complex and expire regularly. Passwords can be recovered should we have to do so.

## **12 Policy documents**

The Parish Council will;

- Review all supplier contracts and interactions with the aim of moving to a GDPR compliant wording to ensure we are operating with consent.
- Adopt an updated Privacy Policy as a transparent message, on documents and its website.
- Adopt an updated Retention Policy.

## **13 Shared data**

We have identified all external parties with which we have shared data, and asked that they enter into appropriate processor agreements.

## **14 Subject access request**

We will adopt constructed policies and an active engagement with external parties to minimise the likelihood of aggressive and litigious Subject Access Requests. Any litigious Subject Access Requests will be reported to the Data Protection Officer.

## **15 Security and encryption**

Encryption has been deployed as a defence on all the Parish Council's devices containing personal information. On the Parish Council's Laptop this was achieved using Windows 10 Pro. An encrypted storage was purchased and is now used.

Some Councillors use personal devices. The Code of Conduct will be reviewed, and any acceptable use policies, to ensure that (at the very least) there is an awareness of the risks.



Company registered number 09329065 [www.satswana.com](http://www.satswana.com)

## 16 Summary

The Parish Council has all the expected situations that will be found all over the Country from a historical structure that has developed over time, though it has embraced digital advances impressively. It is essential however to move further away from paper records into secure digital records, and to review its consent to hold data where required.