

GDPR Training notes from 9th February 2018

This training session was **outstanding**.

Firstly, RBWM are offering us the use of Martin Tubbs as our Data Protection Officer (DPO) for FREE!!!! He will need to have access to a linked officer (Jennifer said officer but it later transpired that she didn't mean officer in the legal sense, it could be a councillor or a member of the public who agreed to take on the role as a volunteer or paid) in the PC. It would seem logical, to me, that this is the Clerk. If there are any breaches or queries then the linked officer/person can contact Martin, he will review and offer guidance and/or inform the ICO if needed.

In a nutshell we need to ...

*Perform an Information Audit - make a spreadsheet of all the data we hold, where we hold it, how it is accessed, what it is used for, how long it is kept, is it extra sensitive or not. We need to determine that the security (of access and possible loss) is appropriate for the sensitivity and importance of the data.

*Write down our procedures for dealing with a privacy breach - basically contact Martin, find out how it happened and make sure we alter practices so it doesn't happen again.

*Prepare privacy statements for each area of processing - ie the burial ground data (of relatives etc) privacy statement will be different from the employee privacy statement or indeed the privacy statement for us as parish councillors.

An outline privacy statement would contain our details, the DPO details, the purpose for processing and the legal basis (of which there are six), the recipients of the data (if any) and if we are going to transfer the data abroad (EU is abroad after Brexit). The NALC legal briefing is available

at <http://www.morcottparishcouncil.org.uk/uploads/108-17---privacy-notice-and-the-legal-basis-for-processing-personal-data110681.pdf>

We should post our privacy statements online and have them either on or referred to on any paper documentation for say allotments application forms, burials forms, employment letters etc.

The stick part of the new legislation is that organisations will have only 72 hours to report a breach and the maximum fine has gone up to £17m or 4% of global turnover. It is thought that ICO will not be looking to fine PCs, that they will be more inclined to issue enforcement notices. And although the legislation comes in on 25th May, if we show that we are on the way to implementing with a clear and documented path towards compliance then we should be safe. Members going to the seminar yesterday would be step one of evidence that we are en route to implementation.