



## GDPR Risk Assessment

**Name of Council:** Wilby Parish Council

**Date:** 6<sup>th</sup> March 2019

Area of risk	Risk Identified	Risk Level H/M/L	Management of Risk	Action taken/completed
<b>All personal data</b>	Personal data falls into hands of a third party	L	Identify what personal data your council holds. Examples include the Electoral Roll, Job applications, tenancy agreements), why it holds it and for how long, who it shares with (see separate Assessment of Personal Data held by councils)	LOCKED FILING CABINET PASSCODE ON LAPTOP
		L	Identify how you store personal data. Examples include paper files, databases, electronic files, laptops and portable devices such as memory sticks or portable hard drives.	AS ABOVE
	Publishing of personal data in the minutes and other council documents	L	Avoid including any personal information in the minutes or other council documents which are in the public domain. Instead of naming a person, say 'a resident/member of the public unless necessary.	CARE ON MINUTES
<b>Sharing of data</b>	Personal data falls into hands of a third party	L	Does your council share personal data with any other organisations, for example other local authorities? If yes, you may need to set up a written agreement with the organisation to ensure that they protect the data once passed to them	INFORMATION NOT SHARED
<b>Hard copy data</b>	Hard copy data falls into hands of a third party	L	Decide how much of the personal data held is necessary. Destroy personal data which is no longer needed in line with the Retention of Documents policy	OLD DOCUMENTS DESTROYED
		L	Ensure that sensitive personal data is stored securely in a locked room or cabinet when not in use	LOCKED CABINET
		N/A	If using a shared office operate a clear desk policy when not at desk at the end of the day Cash handling is avoided, but where necessary appropriate controls are in place	N/A
<b>Electronic data</b>	Theft or loss of a laptop, memory stick or hard drive containing personal data	M	Ensure that all devices are password protected	PASSWORDS SET UP
			Make all councillors aware of the risk of theft or loss of devices and the need to take sensible measures to protect them from loss or theft	COUNCILLORS AWARE

			Carry out regular back-ups of council data	DONE REGULARLY
			Ensure safe disposal of IT equipment and printers at the end of their life	NOTED AND DIARISED
			Ensure all new IT equipment has all security measures installed before use	SET UP CORRECTLY
<b>Email security</b>	Unauthorised access to council emails	L	Ensure that email accounts are password protected and that the passwords are not shared or displayed publically	PASSWORD PROTECTED
		L	Set up separate parish council email addresses for employees and councillors (recommended)	SEPARATE EMAIL ADDRESS SET UP FOR PC BUSINESS
		L	Use blind copy (bcc) to send group emails to people outside the council	
		L	Use encryption for emails that contain personal information	
		L	Use cut and paste into a new email to remove the IP address from the header	
		L	Do not forward on emails from members of the public. If necessary, copy and paste information into a new email with personal information removed.	
		L	Delete emails from members of public when query has been dealt with and there is no need to keep it	
<b>General internet security</b>	Unauthorised access to council computers and files	M	Ensure that all computers (including councillors) are password protected and that the passwords are not shared or displayed publically	PASSWORD PROTECTED
		L	Ensure that all computers (including councillors) have up-to-date anti-virus software, firewalls and file encryption is installed.	SECURITY INSTALLED
		L	Ensure that the operating system on all computers is up-to-date and that updates are installed regularly	
		M	Password protect personal and sensitive information folders and databases. Ensure that shared drives do not provide unauthorised access to HR and other records containing personal information	
<b>Website security</b>	Personal information or photographs of individuals published on the website	M	Ensure that you have the written consent of the individual including parental consent if the subject is 17 or under) Ensure you have a Vetting and Barring Policy	NOTED
<b>Disposal of computers and printers</b>	Data falls into the hands of a third party	L	Wipe the hard drives from computers, laptops and printers or destroy them before disposing of the device	NOTED
<b>Financial Risks</b>	Financial loss following a data breach as a result of prosecution or fines	L	Ensure that the council has liability cover which specifically covers prosecutions resulting from a data breach and put aside sufficient funds (up to 4% of income) should the council be fined for a data breach	CONTINGENCY FUNDS BUDGETED FOR IN CASE OF BREACH
	Budget for GDPR and Data	M	Ensure the Council has sufficient funds to meet the requirements of the new regulations both for equipment and data security and add to budget headings	INCORPORATED IN BUDGET

	Protection		for the future	
<b>General risks</b>	Loss of third party data due to lack of understanding of the risks/need to protect it	L	Ensure that all staff and councillors have received adequate training and are aware of the risks	COUNCILLORS AWARE OF RISK
	Filming and recording at meetings	L	If a meeting is closed to discuss confidential information (for example salaries, or disciplinary matters), ensure that no phones or recording devices have been left in a room by a member of the public	NOTED

**Adopted on:** 6<sup>TH</sup> March 2019 **Signed:** Ian Williamson **(Chairman)**