

Snape Parish Council – Data Protection Risk Assessment

| Workplace/Location: Snape | Directorate: Snape Parish Council | Date of assessment: 22 September | | | | Review Date: 22 September 2021 | | | | |
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| Risk Assessors Name: Marie Backhouse | Job title: Clerk to Snape Parish Council | Risk Assessment For: Compliance with Data Protection Legislation | | | | | | | | |
| DUTIES /TASK | HAZARDS IDENTIFIED | PEOPLE AT RISK | | | | CONTROL MEASURES IN PLACE | RISK RATING | | | |
| | | E | C | P | V | | S | L | R | Risk Adequate |
| Appointment of a Data Protection Officer | <ul style="list-style-type: none"> DPO may not have correct expertise DPO may not keep up with legislative changes | ✓ | ✓ | ✓ | | <ul style="list-style-type: none"> Clerk to attend all relevant training provided by SALC/LCPAS/ICO Clerk to liaise directly with SALC/LCPAS on all queries | 1 | 2 | L | Maintain existing control measures. |
| Subject Access Request (SAR) | <ul style="list-style-type: none"> Not answered in time limits Request not identified correctly Request does not have sufficient information in it | | ✓ | ✓ | | <ul style="list-style-type: none"> Clerk to follow SAR Procedures All potential issues reported to UPC and to subject submitting request | 3 | 1 | L | Maintain existing control measures. |
| Data Breach | <ul style="list-style-type: none"> Personal data falls in to the hands of a third party | ✓ | ✓ | ✓ | ✓ | <ul style="list-style-type: none"> Data Impact Assessment carried out Hard copy data stored securely Laptop password protected | 5 | 1 | M | Maintain existing control measures. |
| Data Breach | <ul style="list-style-type: none"> Publishing of Personal Data in Minutes or on Web Site | ✓ | | ✓ | ✓ | <ul style="list-style-type: none"> All Councillors to review minutes when in draft form 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. | 5 | 1 | M | Maintain existing control measures. |

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| Data Breach | <ul style="list-style-type: none"> • Theft or loss of laptop containing personal data | ✓ | ✓ | ✓ | ✓ | <ul style="list-style-type: none"> • Password protect Laptop • Carry out regular back-ups of council data • Ensure safe disposal of IT equipment and printers at the end of their life • Ensure all new IT equipment has all security measures installed before use | 5 | 1 | M | Maintain existing control measures. |
| Data Breach | <ul style="list-style-type: none"> • Theft or loss of Back-Up Memory Stick | ✓ | ✓ | ✓ | ✓ | <ul style="list-style-type: none"> • Make all councillors (especially Chair) aware of the risk of theft or loss of devices and the need to take sensible measures to protect them from loss or theft | 5 | 1 | M | Maintain existing control measures. |
| Data Breach | <ul style="list-style-type: none"> • Unauthorised access to Council's e-mails | ✓ | ✓ | ✓ | ✓ | <ul style="list-style-type: none"> • Laptop and Mail Account Password known only to Clerk • Passwords changed following suspected breach • Anti-Virus/malware software kept up to date on laptop • Operating System up to date on Laptop | 5 | 1 | M | Maintain existing control measures. |
| Web Site maintenance | <ul style="list-style-type: none"> • Personal information or photographs published on Web Site | ✓ | ✓ | ✓ | ✓ | <ul style="list-style-type: none"> • Ensure access is password protected and limited to nominated people • Ensure that you have the written consent of the individual (including parental consent if the subject is 17 or under) | 4 | 2 | M | Maintain existing control measures. |

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| Financial | <ul style="list-style-type: none"> Financial Loss following a Data Breach | | | ✓ | | <ul style="list-style-type: none"> 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 Check insurance renewal each year | 5 | 1 | M | Maintain existing control measures. |
| Financial | <ul style="list-style-type: none"> Budget for GDPR and Data Protection | | | ✓ | | <ul style="list-style-type: none"> 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 for the future | 3 | 1 | L | Maintain existing control measures. |
| General Risks | <ul style="list-style-type: none"> Loss of third-party data due to lack of understanding of the risks/need to protect it | ✓ | ✓ | ✓ | ✓ | <ul style="list-style-type: none"> Ensure that all staff and councillors have received adequate training and are aware of the risks | 4 | 2 | M | Maintain existing control measures. |

People at Risk Key: E = Employees, C = Customers, P = Public, V = Volunteers

Risk Rating: VH = Very High, H = High, M = Medium, L = Low

Adopted by Snape Parish Council at its meeting on: 22 September 2020