

DITTISHAM PARISH COUNCIL
Incorporating the Hamlet of Capton and the Manors of Bozomzeal and Coombe

Information Management Requirements Policy

Background

Dittisham Parish Council – Clerk and Councillors - must comply with the Data Protection legislation.

DPC's Code of Conduct requires Councillors not to disclose confidential information.

Failure to correctly manage its information is a risk to DPC's reputation.

Data Protection Legislation And Its Key Principles

“Personal data” : Any information about a living individual which allows them to be identified from that data (for example a name, photographs, videos, email address, or address). Identification can be directly using the data itself or by combining it with other other information which helps to identify a living individual.

The UK General Data Protection Regulation sets out seven key principles for processing personal data¹:

- Must be processed lawfully, fairly and transparently.
- Purpose limitation: Can only be used for the purpose it was collected for.
- Data minimisation - Should be adequate, relevant and limited i.e. only the minimum amount of data should be kept for specific processing.
- Accuracy: Must be kept accurate and current, and inaccurate data erased
- Storage limitation: Must only be retained for the time necessary for the purposes and that storage is safe and secure
- Integrity and confidentiality: Must remain secure.
- Accountability: The data processor is responsible for complying, must be able to demonstrate compliance, and must have measures in place to meet the requirements of accountability

Processing can only be a carried out lawfully if one of six specific conditions is met: consent, or necessary for a contract, to comply with the law, to protect someone's life, in the public interest or or official functions based in law, or meet legitimate interests.

Core processes relevant to DPC Councillors' GDPR responsibility

- A regular data audit to review what personal data is held.
- Data security: for example, lock filing cabinets outside working hours and keep the keys secure, use secure computer passwords, switch computers off when not in use.
- Follow processes when councillors cease office to remove their data from public records and for return or destruction of the council's information held by them.
- Deletion of out of date or no longer required data thoroughly, for example good quality shredder.
- Data protection impact assessments for new projects.

¹<https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/principles/>

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1. Emails

Can be viewed in these ways:

- <https://dittishamparish.co.uk:2096>
- In a tool which does not move the information – for example Thunderbird (desktop), TypeApp (desktop and phone), Apple Mail

Cannot be viewed in free Gmail – which may move the information outside of UK and the EU.

Outlook – GDPR compliance seems to depend on how it is set up.

Cannot be forwarded to a private email account.

2. Electronic Information

Locate DPC information in an identifiable location(s) eg folder.

Cloud servers must be in the UK or a location with comparable data protection legislation. (iCloud appears to not be GDPR compliant).

DPC information cannot be placed on a shared device.

External drives must be encrypted.

3. Paper documents

Organise in an identifiable location(s) eg folders.

Lock-up confidential documents.

Destroy confidential documents securely – high quality shredder (can be given to the Clerk to shred).

4. Return of DPC's Information

Organise documents so that the information can be easily returned or destroyed as appropriate when you cease to be a Councillor.

5. Passwords

To access DPC information (laptops/PC, email, bank)

Must be:

- unique
- 11 characters or more
- a mix of alphanumeric characters (letters and numbers) and symbols at least one of each:
Uppercase (capital) letters. Examples: A, E, R
Lowercase (small) letters. Examples: a, e, r
Numbers. Examples: 2, 6, 7
Symbols and special characters. Examples: ! @ & *

Not use personal information or common words & patterns

A password manager can help you.

Examples

Replace letters with numbers & symbols: Choose a word or phrase and use numbers and symbols instead of some letters. Examples:

- "Spooky Halloween" becomes "sPo0kyH@ll0w3En"
- "Later gator" becomes "L8rg@+0R"

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Abbreviate a sentence: Come up with a sentence and use the first letter of each word. Example:

- "Uncle Peter always ate chocolate-covered everything" becomes "uP@8cCe!"

Check your password:

<https://www.security.org/how-secure-is-my-password/>

6. Two step verification & Two factor authorisation recommended where available.

7. Device Protection

Use antivirus/anti-malware and secure firewall software with automatic updates on computer/PC/phone.

Laptop/PC/phone must lock automatically after [not more than two minutes] if left unattended.

Must be locked when not in use.

8. Review of Information

Have a system for the information you hold to be reviewed, destroyed, and to update personal data.

Set emails to be automatically deleted after no longer than [24 months] and earlier as appropriate (where no longer useful or relevant).

9. Record Retention & Disposal Policy

DPC's Record Retention & Disposal Policy provides further detail about specific types of records.

Version History

Approved by DPC 5/4/23