

Orford & Gedgrave Parish Council – Data Protection Risk Assessment

Workplace/Location: Orford Town Hall	Directorate: Orford & Gedgrave Parish Council	Date of assessment: 7 October 2020				Review Date: 7 October 2021				
Risk Assessors Name: Marie Backhouse	Job title: Clerk to Orford & Gedgrave 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"> <li>DPO may not have correct expertise</li> <li>DPO may not keep up with legislative changes</li> </ul>	✓	✓	✓		<ul style="list-style-type: none"> <li>Clerk to attend all relevant training provided by SALC/ICO</li> <li>Clerk to liaise directly with SALC on all queries</li> </ul>	1	2	L	Maintain existing control measures.
Subject Access Request (SAR)	<ul style="list-style-type: none"> <li>Not answered in time limits</li> <li>Request not identified correctly</li> <li>Request does not have enough information in it</li> </ul>		✓	✓		<ul style="list-style-type: none"> <li>Clerk to follow SAR Procedures</li> <li>All potential issues reported to UPC and to subject submitting request</li> </ul>	3	1	L	Maintain existing control measures.
Data Breach	<ul style="list-style-type: none"> <li>Personal data falls into the hands of a third party</li> </ul>	✓	✓	✓	✓	<ul style="list-style-type: none"> <li>Data Impact Assessment carried out</li> <li>Hard copy data stored securely</li> <li>Computer password protected</li> </ul>	5	1	M	Maintain existing control measures.
Data Breach	<ul style="list-style-type: none"> <li>Publishing of Personal Data in Minutes or on Web Site</li> </ul>	✓		✓	✓	<ul style="list-style-type: none"> <li>All Councillors to review minutes when in draft form</li> <li>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.</li> </ul>	5	1	M	Maintain existing control measures.

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

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Financial	<ul style="list-style-type: none"> <li>Financial Loss following a Data Breach</li> </ul>			✓		<ul style="list-style-type: none"> <li>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</li> <li>Check insurance renewal each year</li> </ul>	5	1	M	Maintain existing control measures.
Financial	<ul style="list-style-type: none"> <li>Budget for GDPR and Data Protection</li> </ul>			✓		<ul style="list-style-type: none"> <li>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</li> </ul>	3	1	L	Maintain existing control measures.
General Risks	<ul style="list-style-type: none"> <li>Loss of third-party data due to lack of understanding of the risks/need to protect it</li> </ul>	✓	✓	✓	✓	<ul style="list-style-type: none"> <li>Ensure that all staff and councillors have received adequate training and are aware of the risks</li> </ul>	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 Orford & Gedgrave Parish Council at its meeting on: 14 October 2020