

Orford & Gedgrave Parish Council – Data Protection Risk Assessment

Workplace/Location: Orford Town Hall	Directorate: Orford & Gedgrave Parish Council	Date of assessment: 5 October 2022				Review Date: 5 October 2022				
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"> 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/ICO Clerk to liaise directly with SALC 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 enough 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 into the hands of a third party 	✓	✓	✓	✓	<ul style="list-style-type: none"> Data Impact Assessment carried out Hard copy data stored securely Computer 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 computer containing personal data 	✓	✓	✓	✓	<ul style="list-style-type: none"> • Password protect computer • 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"> • Computer and Mail Account Password known only to Clerk • Passwords changed following suspected breach • Anti-Virus/malware software kept up to date on computer • Operating System up to date on computer 	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 Orford & Gedgrave Parish Council at its meeting on: 12 October 2022