

GDPR: A day in the life of ...

Great Practice Parish Council

Data audit and retention exercise



Introduction

Data protection is everyone's responsibility, therefore this exercise is designed with the intention that it is done as a roundtable collaborative involving leaders, clerks and councillors.

However we appreciate that a collaborative roundtable may not be practical for everyone so we have included instructions in the resource pack of how to do this as a written exercise, without the cards.

We would still encourage you to involve your members as much as possible, perhaps via email or a discussion prior to completing the exercise.

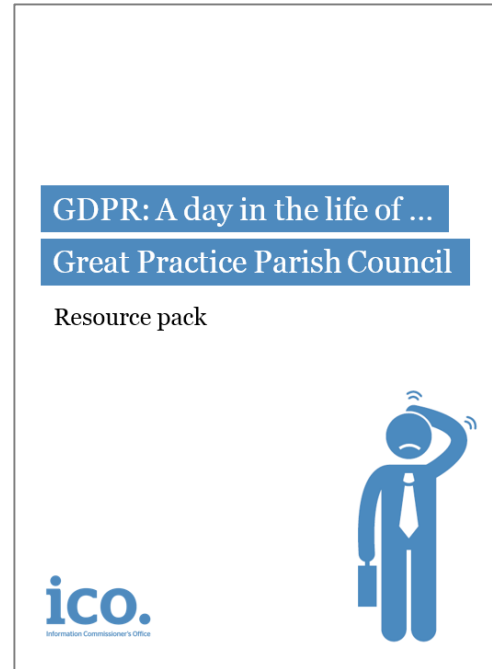
Aims

To think about the personal data your council is processing:

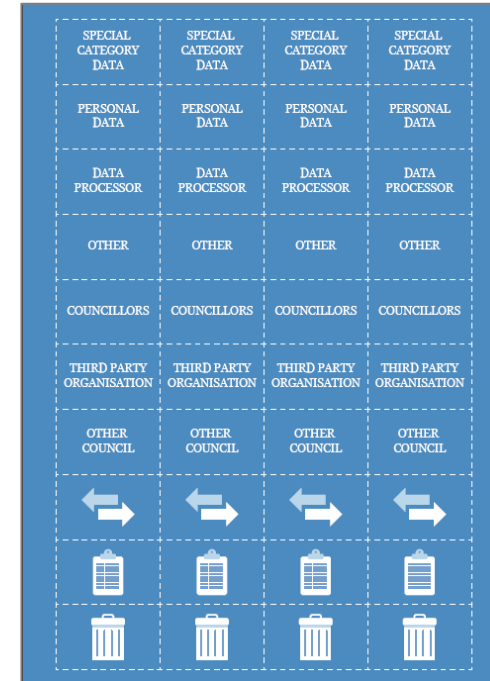
- **Why** is it being processed
- **What** data is being processed
- **How** is it being processed
- **Who** is it being shared with
- **How** long should the information be kept for

What you will need

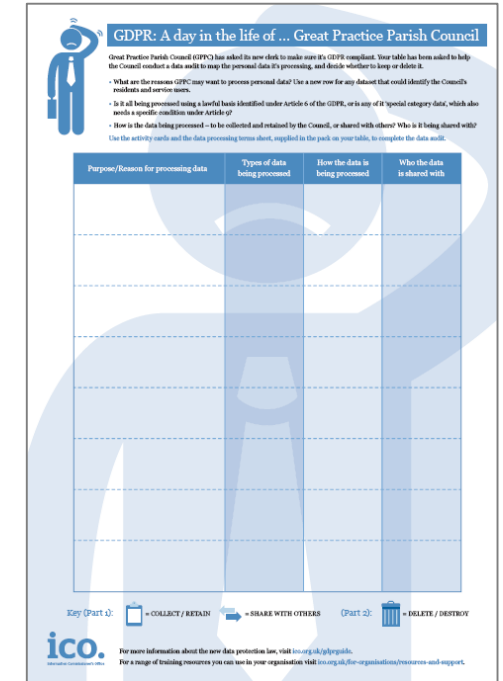
- Pens
- Post it's



The resource pack with a glossary and instructions. Page 18 of this pack or [click here](#).



The cards. Print two copies. Page 21 of this pack or [click here](#).



The board game. Print in A3 Page 22 of this pack or [click here](#).

The cards – what do they mean?

‘What data’ cards



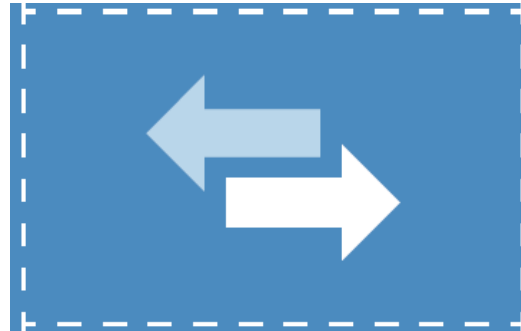
The cards – what do they mean?

‘How’ cards

Collect/retain/use



Share



Delete



The cards – what do they mean?

‘Who with’ cards

DATA
PROCESSOR

THIRD PARTY
ORGANISATION

COUNCILLORS

OTHER
COUNCIL

OTHER

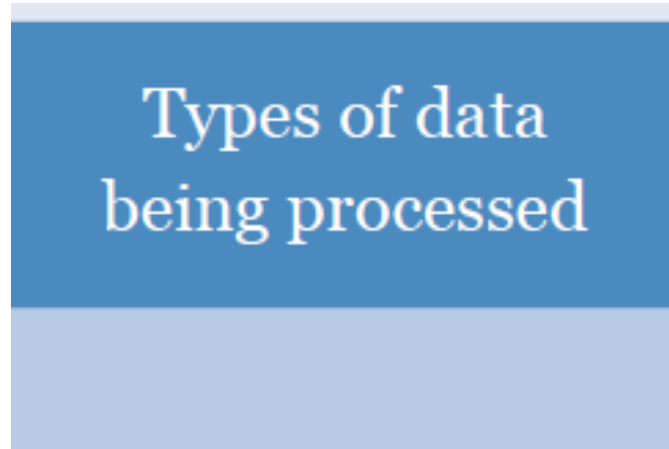
Step One

Purpose/Reason for processing data

Think about the reasons your council processes (collect/hold/use) any personal data.

Write each one in this column (eg marketing, employment records, allotment records, cemetery records etc.) Put each reason in a different box down the column.

Step Two

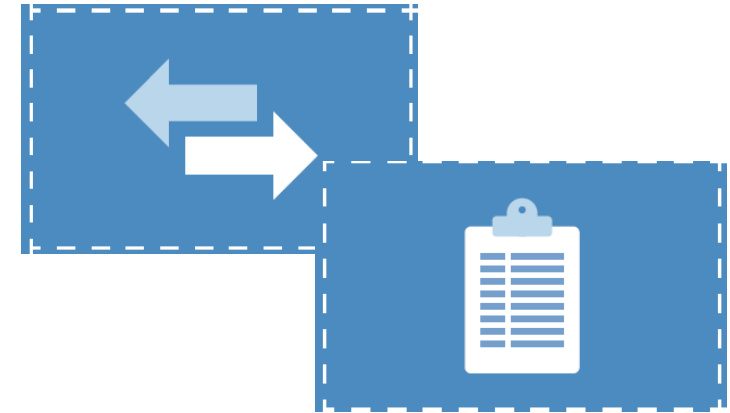
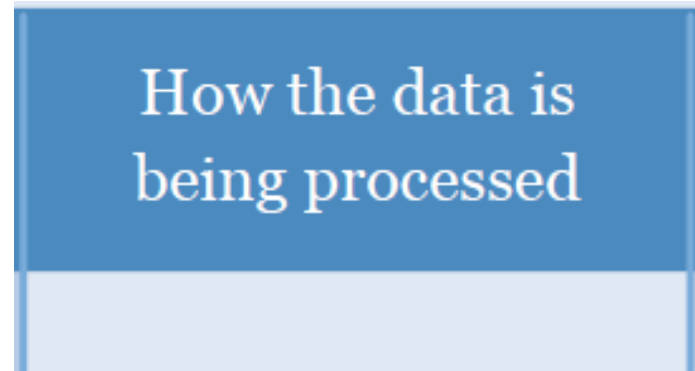


Use your glossary sheet and think about what information you process about individuals. Is it personal data, or special category data?

Place the relevant '**what data**' cards for each purpose down this column.



Step Three

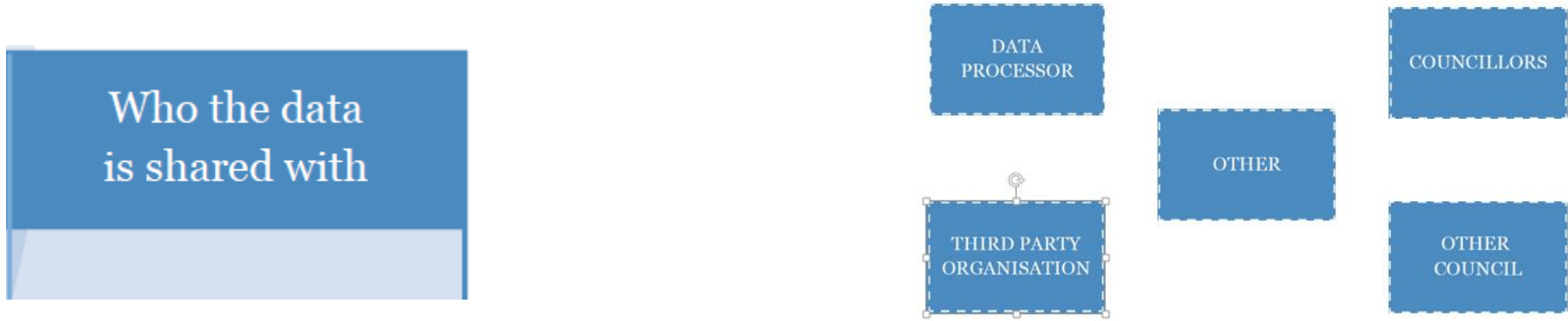


Now consider how the data is being processed. Is it just being collected/held/used locally or is it also being shared with other organisations or individuals

Place the relevant '**how**' card for each purpose down this column. *(ignore the deletion card for the moment – we will get to that shortly)*



Step Four



Where you have indicated that you share the data – think about who you share that information with.

Use the **'who'** cards to indicate who you share this information with

The data sharing resource we have also produced will help you here to review that the data you are sharing is necessary and justified.

Retention

Article 5(1)(e) of GDPR specifies that you must not keep personal data for longer than you need it.

You need to think about – and be able to justify – how long you keep personal data. This will depend on your purposes for holding the data

You should also periodically review the data you hold, and erase or anonymise it when you no longer need it.

Step 5

Now you know what data you hold and why, **think about whether you still need to keep that data.**

You should consider your stated purposes for processing the personal data. You can keep it as long as one of those purposes still applies (eg you are still providing the service to the individual or there is statute/policy that requires you to keep it).

You should not keep data indefinitely, 'just in case', or if there is only a small possibility that you will use it.

Use the **delete card** to indicate what data you think should be deleted



Step 6

Finally for the data you still need to keep – think about how long you need to hold that information for and set a retention/review period



Wrap up

- Try to capture the discussions/issues as this will be useful for reflecting on the process.
- Try to capture the end result – you could simply take a picture as demonstrated here.
- Make sure you capture any retention/review periods you set in step 6 so these can be actioned going forward.

GDPR: A day in the life of ... Great Practice Parish Council

Great Practice Parish Council (GPPC) has asked its new clerk to make sure it's GDPR compliant. Your table has been asked to help the Council conduct a data audit to map the personal data it's processing, and decide whether to keep or delete it.

- What are the reasons GPPC may want to process personal data? Use a new row for any dataset that could identify the Council's residents and service users.
- Is it all being processed using a lawful basis identified under Article 6 of the GDPR, or is any of it 'special category data', which also needs a specific condition under Article 9?
- How is the data being processed – to be collected and retained by the Council, or shared with others? Who is it being shared with?

Use the activity cards and the data processing terms sheet, supplied in the pack on your table, to complete the data audit.

Purpose/Reason for processing data	Types of data being processed	How the data is being processed	Who the data is shared with
Suppliers + Contractors	PERSONAL DATA		
Marketing Data	PERSONAL DATA		
VOLUNTEERS Data base	PERSONAL DATA		
Cemetery Records- bookings etc.	PERSONAL DATA		THIRD PARTY ORGANISATION
ATTENDANCE AT MEETING	PERSONAL DATA		OTHER COUNCIL COUNCILLORS
Employee Records	PERSONAL DATA		DATA PROCESSOR
	SPECIAL CATEGORY DATA		

Key (Part 1): = COLLECT / RETAIN = SHARE WITH OTHERS (Part 2): = DELETE

CO. For more information about the new data protection law, visit ico.org.uk/gdprguide.
For a range of training resources you can use in your organisation visit ico.org.uk/for-organisations

Further guidance

[Guide to GDPR - Storage limitation](#)

[The National Archives](#)

GDPR: A day in the life of ...

Great Practice Parish Council

Resource pack



GDPR: A day in the life of... Glossary/definitions

Data processing – includes collecting, using, recording, organising, structuring, storing, adapting, altering, disclosing, disseminating, erasing and deleting personal data.

Controller – A controller determines the purposes and means of processing personal data – Controllers are the main decision-makers – they exercise overall control over the purposes and means of the processing of personal data (eg the council will be a controller for the data it processes)

Processor – A processor will act on behalf of, and only on the instructions of, the relevant controller.

Personal data – Personal data is information that relates to an identified or identifiable individual. For example, name address, date of birth or could include other identifiers such as a national insurance number, IP address or a cookie identifier, or other factors.

If a local council believes it cannot directly identify an individual from the data it processes about them, it still needs to consider whether the individual is still identifiable. You should take into account the information you are processing together with all the means reasonably likely to be used by you or another person that could identify that individual.

In order to lawfully process personal data, you must identify a lawful basis under Article 6.

Special category data – Special category data is personal data which reveals racial or ethnic origin, political opinions, religious/philosophical beliefs or trade union membership. It also includes the processing of genetic data, biometric data for the purpose of identifying a natural person, data concerning health, or data concerning a natural persons sex life or sexual orientation.

In order to lawfully process special category data, you must identify both a lawful basis under Article 6 and a separate condition for processing special category data under Article 9. These do not have to be linked.

How to complete the board game without the cards

Purpose/reason for processing data

- Write the reasons you process (collect/hold/use) any personal data
e.g. marketing, employment records, allotment records, cemetery records
- Put each reason in a different box down the sheet.

Types of data being processed

- Write whether it is personal data and/or special category data you are collecting/using for each reason.

How the data is being processed

- Write here whether you are just collecting/holding the data OR Whether you are also sharing it.

Who the data is being shared with

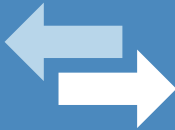
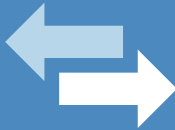
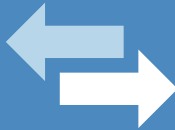
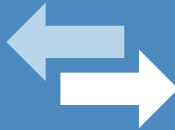








- Write here the people who you share the data with:
a) Councillor b) another council c) third party d) data processor e) other

The data sharing resource we have also produced will help you here to review that the data you are sharing is necessary and justified.

EXAMPLE

Purpose/reason for processing data	Types of data being processed	How the data is being processed	Who the data is being shared with
Maintaining allotments	Personal data	Collected and held	N/A
Employment records	Personal data and special category data (may include ethnicity and health information)	Collected and held Also shared	Data processor to deal with payroll
Club memberships	Personal data	Collected and held Also shared	Third party – golf club

The final step... RETENTION – now you have identified the data you are processing and why, think about whether you actually need to keep this information/how long it needs to be held. Can you delete it or identify a timeframe for deletion?

SPECIAL CATEGORY DATA	SPECIAL CATEGORY DATA	SPECIAL CATEGORY DATA	SPECIAL CATEGORY DATA
PERSONAL DATA	PERSONAL DATA	PERSONAL DATA	PERSONAL DATA
DATA PROCESSOR	DATA PROCESSOR	DATA PROCESSOR	DATA PROCESSOR
OTHER	OTHER	OTHER	OTHER
COUNCILLORS	COUNCILLORS	COUNCILLORS	COUNCILLORS
THIRD PARTY ORGANISATION	THIRD PARTY ORGANISATION	THIRD PARTY ORGANISATION	THIRD PARTY ORGANISATION
OTHER COUNCIL	OTHER COUNCIL	OTHER COUNCIL	OTHER COUNCIL
			
			
			



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Purpose/Reason for processing data	Types of data being processed	How the data is being processed	Who the data is shared with

Key (Part 1):



= COLLECT / RETAIN



= SHARE WITH OTHERS

(Part 2):



= DELETE / DESTROY