

# THURSTON PARISH COUNCIL

# DATA PROTECTION IMPACT ASSESSMENT

Workplace/Location:	Organisation:	Date of Initial Assessment:	Review Date:	Comment by reviewer
Thurston	Thurston Parish Council	12.05.2018	15.05.2020 VSW	Amendments made
			11.01.2021 VSW	Installation of CCTV at Recreation Ground
			24.01.2023 VSW	Detached Youth Worker Project
			18.07.2023 VSW	Food Parcel Project - CAB/Bluebells
			01.04.25 VSW	Allotments - Thurston Park
			12.08.2025 VSW	Detached Youth Worker Project removed
			12.08.2025 VSW	Food parcel project removed

Risk Assessor's Name:	Job Title:	Risk Assessment For:	Reivew submitted to
Vicky Waples	Clerk to Thurston Parish Council	Compliance with Data Protection Legislation	Policy & Resources Committee

Item	Type	Origins of data?	Who is it shared with?	What do we do with it?	Reason for retaining*	Keep / Discard	Period of Retention	Notes
E-mail folders	E-mail	As collected by current Clerk	Only Clerk has access.	Refer to items completed or ongoing	2, 4, 5 and/or 6	Keep	2 years	Regular reviews carried out to ascertain whether data is still required
E-mail address book	E-mail	Passed from previous Clerk and added to	Only Clerk has access.	Contact residents, other authorities, contractors, staff, councillors - all for Council business only	5	Keep	2 years	Regular reviews carried out to ascertain whether data is still required
Paperwork in Filing Cabinets	Paper	Passed from previous Clerk and added to	Only Clerk and Councillors have access	Storage of documents required to be kept legally	3	Keep	In line with legislation	Annual Review carried out. Removal of items in accordance with Document and Electronic Data Retention Policy

Planning Applications	Electronic	Mid Suffolk District Council	On view at public meetings via Mid Suffolk Planning Portal	Used to perform a Statutory Function. Assess potential development	5	Keep & then discard	3 years unless conditions outstanding	Files kept for maximum period to ensure conditions adhered to. Data files will be removed once expiry of timed conditions.
Electoral Role (Full)	Electronic	Mid Suffolk District Council	Only Clerk has access	Used for Reference only	5	Keep and Discard	1 year	Current version retained only. All old versions discarded (shredded)
Complaints	Electronic	Complainant	Clerk and Councillors of the Policy and Resources Committee	Used for Reference only	5	Keep and Discard	1 year	Details discarded once complaint resolved
Complaints	Paper	Complainant	Clerk and Councillors of the Policy and Resources Committee	Used for Reference only	5	Keep and Discard	1 year	Details discarded once complaint resolved
Agenda and Minutes	Electronic & Hard Copy	Clerk	All	Minutes stored as hard copy and electronic copy in perpetuity. Agendas stored for 5 years (electronically only)	3 and 5	Keep	Agenda - 3 years Minutes - in perpetuity	Agendas over 3 years old are deleted. All hard copy minutes are kept in the Council's filing cabinet.
Laptop Back-Ups	Electronic (data stored in Onedrive)	Laptop	Clerk only	Store	5	Keep	In line with legislation	All data constantly backed up to Cloud (Onedrive).
External Hard-drive	Electronic	Laptop	Clerk only	Store	5	Keep	6 months	Carried out on a monthly basis and kept in Council Office safe. Data destroyed in accordance with Retention Document specifications.

Website	Electronic	Clerk, residents, clubs, village organisations	Everyone	Sharing of information to enable council to carry out its role and comply with relevant legislation & sharing of information to and from organisations, businesses, clubs and outside agencies with the village	3 and 5	Keep	In line with legislation	Content reviewed and updated regularly
Details of Grants and Donations	Electronic & Hard Copy	Village Organisations, Local Charities	Councillors only	Access request for annual grants to be awarded	5	Keep & discard	In line with legislation	Keep in accordance with audit requirements and then destroyed
Information relating to children	None at present	None	N/A	N/A	4	N/A	N/A at present	Where views of children are captured in the future this will be in line with the Council's Safeguarding Policy and all data will be destroyed once the project is completed.
Employee Details (appraisals, application details, personal details etc.)	Paper and Electronic	Employee, HMRC	Only Clerk has access	Current details are used to assess performance and reward. Personal details are held in accordance with HMRC requirements for the operation of the Council's duties as an employer. Sensitive data is passed to individual employees in a secure envelope marked "Confidential"	2, 3, 5	Keep and Discard	In line with legislation	All data relating to previous employees kept in accordance with retention periods as outline in the Council's Retention Policy. Once retention period is expired all papers are destroyed. Current Clerk's appraisals held by Clerk electronically and by the Chair of the Parish Council.

Sensitive Data - Employment	Paper and Electronic	Employee, Employer	Only Clerk has access	Where information that is sensitive is to be passed over it should be in a secure envelope - marked "Confidential".	1,2,3,5	Keep and Discard	In line with legislation	All data relating to previous employees kept in accordance with retention periods as outline in the Council's Retention Policy. Once retention period is expired all papers are destroyed. Current Clerk's appraisals held by Clerk electronically and by the Chair of the Parish Council.
CCTV	Electronic	CCTV Control Group - Parish Clerk, Parish Council Chair and Vice-Chair, Representative from Cavendish Hall Management Committee	Registered stakeholders in order to complete official functions or tasks in the public interest. This will cover, but is not limited to public authorities such as government departments, schools and other educational institutions, hospitals and the police and those involved in combatting criminal behaviour.	To protect our premises from vandalism, theft and the purpose of public safety. CCTV not used for monitoring employees or hirers of the facility.	3, 5, 6	Keep and Discard	30 days or longer if required for legal purposes	Signs will be installed to Pavilion and Cavendish Hall notifying that CCTV and ANPR Cameras are in use. Entrance sign to be intalled noting name of area. PC is registered with the ICO (Information Commissioner's Office). The CCTV was installed by OAKS CCTV Ltd and the installer provide full details on how to operate the ssystem and how to export data if necessary. There is an annual service contract in place by the same company. The CCTV system will be monitored by: <ul style="list-style-type: none"> <li>•Ensuring compliance with the GDPR Regulations.</li> <li>•Deletion of recordings after 30 days.</li> <li>•Regular maintenace of the cameras to ensure all is working properly</li> </ul>

Sensitive Data - Allotments - Denbury Park	Paper and Electronic	Allotment tenants, Clerk	Clerk has access to personal data, bank signatories have access to banking details	Used to perform a statutory function.	1, 2, 3, 5	Keep and Discard	Whilst they remain an allotment tenant	All data relating to previous tenants kept in accordance with retention periods as outline in the Council's Retention Policy. Once retention period is expired all papers are destroyed.
--	----------------------	--------------------------	--	---------------------------------------	------------	------------------	--	--

\* Legitimate reasons for retaining personal data:

1. Consent of the data subject	5. Necessary for the performance of a task carried out in the public interest in the exercise of official authority vested in the controller
2. Necessary for the performance of a contract	6. Necessary for the purpose of legitimate interests pursued by the controller (except where overridden)
3. Necessary for compliance with a legal obligation	
4. Necessary to protect vital interests of a data subject or other	