

DARTFORD BOROUGH COUNCIL – DATA RETENTION & DISPOSAL POLICY & SCHEDULE

For the purposes of this Policy:

'Data Protection Legislation' means the GDPR and any national implementing laws, regulations and secondary legislation, as amended or updated from time to time and any successor legislation to the GDPR or the Data Protection Act 2018 and all applicable laws and regulations relating to processing of personal data and privacy, including where applicable the guidance and codes of practice issued by the Information Commissioner

'GDPR' means the General Data Protection Regulation (EU) 2016/679)

- 1. Why is storage limitation important?** – even if we collect and use personal data fairly and lawfully, we cannot keep it for longer than we actually need it. The Data Protection Legislation does not set specific time limits for different types of data. Unless there are legal or regulatory requirements to retain data for a specific period, it is up to us to agree our retention periods, which will depend on how long we need the data for our specified purposes.

Examples:

- we can keep *anonymised data* for as long as we want. In other words, we can either delete or anonymise the personal data once we no longer need it.
- we can keep personal data for longer if we are only keeping it for public interest archiving, scientific or historical research, or statistical purposes (and we have appropriate safeguards).

Ensuring that we *erase or anonymise* personal data when we no longer need it will reduce the risk that it becomes irrelevant, excessive, inaccurate or out of date. Apart from helping us to comply with the Data Protection Legislation's data minimisation and accuracy principles, this also reduces the risk that we will use such data in error to the detriment of all concerned.

Personal data held for too long will, by definition, be unnecessary. We are unlikely to have a lawful basis for retention. From a more practical perspective, it is inefficient to hold more personal data than we need, and there may be unnecessary costs associated with storage and security. Our legacy databases are being reviewed and or migrated to new applications to ensure compliance with this Policy.

2. About this Policy

2.1 Our **Information Asset Registers & Records of Processing Activity (ROPA¹)** ('IARs/ROPAs') in the Annex to this Policy, list the types of record or information we hold, where it is held, what we use it for and how long we intend to keep it. The IARs/ROPAs help us establish and document standard retention periods for different categories of personal data. We consider our stated purposes for processing personal data. We will keep it as long as one of those purposes still applies, but we will not keep data indefinitely 'just in case', or if there is only a small possibility that we will use it.

¹ Article 30 GDPR

2.2 Our corporate information, records and data are important to how we conduct business and manage employees.

2.3 There are legal and regulatory requirements for us to retain certain data, usually for a specified amount of time. We also retain data to help our business operate and to have information available when we need it. However, we do not need to retain all data indefinitely, and retaining data can expose us to risk as well as be a cost to our business.

2.4 This Policy explains our requirements to retain data and to dispose of data and provides guidance to our staff on appropriate data handling and disposal.

2.5 Failure to comply with this Policy can expose us to fines and penalties, adverse publicity, difficulties in providing evidence when we need it and in running our business.

2.6 We reserve the right to amend this Policy at any time.

3. Scope of this Policy

3.1 This Policy covers all data that we hold or have control over. This includes physical data such as hard copy documents, contracts, notebooks, letters and invoices. It also includes electronic data such as emails, electronic documents, audio and video recordings and CCTV recordings. It applies to both personal data² and non-personal data³. In this Policy, we refer to this information and these records collectively as “**data**”.

3.2 This Policy covers data that is held by third parties on our behalf, for example cloud storage providers, data processors, joint service arrangements or offsite records’ storage. It also covers data that belongs to us but is held by employees on personal devices in accordance with our IT Security Policy.

3.3 Our IARs/ROPAs, in the Annex to this Policy, identify the data that we must or should retain and the period of retention. The IARs/ROPAs identify Asset Information Owners with the responsibilities outlined in *Paragraph 5* below. If data is not listed in the IARs/ROPAs and it is considered that it should be listed and/or if any changes that may affect the periods listed in the IARs/ROPAs need to be made or if there are any questions about retention periods, the relevant Information Asset Owner should be contacted in the first instance. If further advice is required, contact the Data Protection Officer or Legal Services.

3.4 This Policy explains the differences between our formal or official records, disposable information, confidential information belonging to others, personal data and non-personal data.

3.5 This Policy applies to all service departments and functions.

4. Guiding principles

4.1 Through this Policy and our data retention practices referred to in our IARs/ROPAS, we aim to

²Any information identifying a living individual or information relating to a living individual that we can identify (directly or indirectly) from that data alone or in combination with other identifiers we possess or can reasonably access. This includes special categories of personal data such as health data and pseudonymised personal data but excludes anonymous data or data that has had the identity of an individual permanently removed. Personal data can be factual (for example, a name, email address, location or date of birth) or an opinion about that person’s actions or behaviour

³Data which does not identify living individuals, either because it is not about living individuals (for example financial records) or because it has been fully anonymised

meet the following commitments:

- we comply with legal and regulatory requirements to retain data;
- we comply with our data protection obligations, in particular to keep personal data no longer than is necessary for the purposes for which it is processed (storage limitation principle);
- we handle, store and dispose of data responsibly and securely;
- we create and retain data where we need this to operate our business effectively, but we do not create or retain data without good business reason;
- we allocate appropriate resources, roles and responsibilities to data retention;
- we regularly remind employees and our councillors of their data retention responsibilities;
- we regularly monitor and audit compliance with this Policy and update this Policy when required.

5. Roles and responsibilities

5.1 Responsibility of all employees - we aim to comply with the laws, rules, and regulations that govern our organisation and with recognised compliance good practices issued by the Information Commissioner.

All employees must comply with this Policy, data retention practices referred to in the IARs/ROPAs, any communications suspending data disposal and any specific instructions from the Data Protection Officer. Failure to do so may subject us to serious civil and/or criminal liability.

5.2 Information Asset Owners are responsible for:

- (a) identifying the data that we must or should retain and determining the proper period of retention;
- (b) justifying why we need to keep personal data in a form that permits identification of individuals;
- (c) arranging proper storage and retrieval of data;
- (d) handling the destruction or anonymisation of data whose retention period has expired;
- (e) ensuring that the risks to, and the opportunities for, the data referred to in the IARs/ROPAs are monitored;
- (f) ensuring that retention periods are kept to in practice (subject to the flexibility provided by this Policy to allow for early deletion if appropriate);
- (g) reviewing retention at appropriate intervals;
- (h) reviewing whether to keep personal data if an individual asks us to delete it.

5.3 We have designated the Head of Legal Services as our **Data Protection Officer** and the I.C.T. Manager as our **Senior Information Risk Owner**. Their respective responsibilities are as follows:

Data Protection Officer

- to inform and advise the Council and its employees about their obligations to comply with the Data Protection Legislation;
- to monitor compliance with the Data Protection Legislation, including managing internal data protection activities, advise on data protection impact assessments and train staff;
- to be the first point of contact for the ICO and for individuals whose data is processed (employees, customers etc.)

Senior Information Risk Officer

- to own the Council's overall IT Security Policy and IT risk assessment processes and ensuring they are implemented consistently by Information Asset Owners;

- to ensure the audit of the Council's Data Protection Legislation processes in accordance with the Audit Plan (as agreed by Management Team);
- advising the Management Team and the Audit Board on the information risk aspects of the Council's statement on internal controls/annual governance statement;
- reporting to the Audit Board on the effectiveness of the Council's' cyber security management processes;
- owning the Council's IT incident management framework.

6. Types of data and data classifications

6.1 Formal or official records (archives) - certain data is more important to us and is therefore listed in our IARs/ROPAs. This may be because we have a legal requirement to retain it, or because we may need it as evidence of our transactions, or because they are worth preserving permanently e.g. committee minutes, or because it is important to the running of our business. Please see [Paragraph 7.1](#) below for more information on retention periods for this type of data.

6.2 Disposable information - disposable information consists of data that may be discarded or deleted at the discretion of the user once it has served its temporary useful purpose and/or data that may be safely destroyed because it is not a formal or official record as defined by this Policy. Examples may include:

- duplicates of originals that have not been annotated;
- preliminary drafts of letters, minutes, memoranda, reports, worksheets, and informal notes that do not represent significant steps or decisions in the preparation of an official record;
- books, periodicals, manuals, training binders, and other printed materials obtained from sources outside our organisation and retained primarily for reference purposes;
- spam and junk mail;
- any other record(s) which in the opinion of the Information Asset Owner is no longer required or necessary for business purposes.

Please see [Paragraph 7.2](#) below for more information on how to determine retention periods for this type of data.

6.3 Personal data - both formal or official records and disposable information may contain personal data - that is, data that identifies living individuals. Data Protection Legislation requires us to retain personal data for no longer than is necessary for the purposes for which it is processed (principle of storage limitation). See [Paragraph 7.3](#) below for more information on this.

6.4 Confidential information belonging to others - any confidential information that we may have obtained from an external source, such as a previous employer, will not, so long as such information remains confidential, be disclosed by us. Unsolicited confidential information submitted to us will be refused, returned to the sender where possible, and deleted, if received via the internet.

7. Retention periods (see the Annex)

7.1 Formal or official record including archiving - any data listed in the IARs/ROPAs, is to be retained for the amount of time indicated in the IARs/ROPAs, unless, in the opinion of the Information Asset Owner, the data is no longer required or necessary for business purposes (the Information Asset Owner being satisfied that the general exception circumstances in [Paragraph 9](#) do not apply). Data should not be retained beyond the period indicated in the IARs/ROPAs, unless a valid business reason (or notice to preserve documents for contemplated litigation or other special situation such as permanent preservation) calls for its continued retention. If in doubt, contact the Data Protection Officer or Legal

Services.

7.2 Disposable information - the IARs/ROPAs will not set out retention periods for disposable information. This type of data should only be retained as long as it is needed for business purposes. Once it no longer has any business purpose or value, it should be securely disposed of. If in doubt, contact the Data Protection Officer or Legal Services.

7.3 Personal data - as explained above, Data Protection Legislation requires us to retain personal data for no longer than is necessary for the purposes for which it is processed (principle of storage limitation). Where data is listed in the IARs/ROPAs, Information Asset Owners will have taken into account the principle of storage limitation and balanced this against our requirements to retain the data. Where data is disposable information, Information Asset Owners must take into account the principle of storage limitation (see *Paragraph 1* above) when deciding whether to retain this data.

7.4 What to do if data is not listed in the IARs/ROPAs - if data is not listed in the IARs/ROPAs, it is likely that it should be classed as disposable information. However, if it is considered that there is an omission in the IARs/ROPAs, or if unsure, contact the relevant Information Asset Owner in the first instance.

8. Storage, destruction of data and beyond use

8.1 Storage - our data must be stored in a safe, secure, and accessible manner. Any documents and other records that are essential to our business operations during an emergency must be duplicated and/or backed up at least once per week and maintained off site. In most cases, this will be achieved as part of the corporate IT systems' back-ups.

8.2 Destruction – Information Asset Owners are responsible for the continuing process of identifying the data that has met its required retention period and supervising its destruction. The destruction of confidential, financial, and employee-related hard copy data must be conducted by shredding if possible. Non-confidential data may be destroyed by recycling. The bulk destruction of electronic data must be coordinated with IT Services.

The destruction of data must stop immediately where the preservation of documents for contemplated litigation is required (sometimes referred to as a litigation hold). This is because we may be involved in a legal claim (see *Paragraph 9*). Destruction may resume once Legal Services lifts the requirement for preservation.

8.3 Beyond use - The ICO will be satisfied that information has been 'put beyond use', if not actually deleted, provided that the Council:

- is not able, or will not attempt, to use the personal data to inform any decision in respect of any individual or in a manner that affects the individual in any way;
- does not give any other organisation access to the personal data;
- surrounds the personal data with appropriate technical and organisational security; and
- commit to permanent deletion of the information if, or when, this becomes possible.

It is, however, important to note that where data 'put beyond use' is still held, it might need to be provided in response to a court order. Therefore, Information Asset Owners should, in consultation with IT Services, work towards technical solutions to prevent deletion problems occurring in the future.

9. Exception circumstances

9.1 Preservation of documents for contemplated litigation and other special situations - we require all employees to comply fully with our IARs/ROPAs and procedures as provided in this Policy. All employees should note the following general exception to any stated destruction schedule:

If you believe, or you are informed, that certain records are relevant to current litigation or contemplated litigation (that is, a dispute that could result in litigation), investigation, audit, or other event, you must preserve and not delete, dispose, destroy, or change those records, including emails and other electronic documents, until it is determined for example by Legal Services or Internal Audit that those records are no longer needed. Preserving documents includes suspending any requirements for deletion in the IARs/ROPAs and preserving the integrity of the electronic files or other format in which the records are kept.

*In general, **archiving** will apply to records that are worth preserving permanently, such as committee minutes or where the Council processes personal data for archiving purposes beyond the stated retention period if doing so is in the public interest, or for historical, scientific or statistical purposes.*

9.2 Where it is believed that this exception may apply, or there are any questions regarding whether it may apply, Legal Services is to be asked for advice.

9.3 On occasions, any routine data disposal procedures in connection with certain other types of events may be suspended, such as where we enter into joint service arrangements with another local authority or the replacement of our information technology systems.

10. Where to go for advice and questions

10.1 Questions about retention periods - Information Asset Owners are ultimately responsible for ensuring compliance with the retention periods referred to in their IARs/ROPAs. Any questions about retention periods relevant to a specific function or service should first be raised with the relevant Information Asset Owner.

10.2 Questions about this Policy - any questions about this Policy should be referred to the Data Protection Officer dataprotection@dartford.gov.uk, who is responsible for enforcing and updating this Policy.

11. Breach reporting and audit

11.1 Reporting breaches - we are committed to enforcing this Policy as it applies to all forms of data. Breaches or suspected breaches of this Policy should be reported immediately to the relevant Information Asset Owner and Director, under copy to the Data Protection Officer, to enable appropriate corrective action to be taken immediately. Please note that the Council must report a notifiable breach to the ICO without undue delay, but not later than 72 hours after becoming aware of it. If it takes longer than this, we must give reasons for the delay.

11.2 Audits - our Internal Audit may periodically review this Policy and its procedures [including where appropriate by taking external auditor advice] to ensure we comply with the Data Protection Legislation.

12. Joint services – we are a joint data controller with Sevenoaks District Council for the delivery of services relating to Business Rates (NNDR), Council Tax, Environmental Health, Fraud Prevention & Detection and Internal Audit.

Retention periods relating to Environmental Health and Internal Audit are published by us.

Sevenoaks District Council does not publish its retention periods in a single place for Council Tax and Fraud Prevention & Detection. Request for retention periods relating to these services are to be made to data.protection@sevenoaks.gov.uk

13. Other relevant policies

13.1 This Policy supplements and should be read in conjunction with our other policies and procedures (on the intranet) in force from time to time, including without limitation our:

- Business Continuity Plans
- Corporate Privacy Notice and/or service specific Privacy Notices
- Data Breach Notification Procedure
- Data Protection Policy
- Information Asset Registers & Records of Processing Activity (ROPAs)
- IT Email Archiving
- IT Email Tidying
- IT Security Policy
- IT User Acceptance Policy
- Records Management Policy Statement

ANNEX - INFORMATION ASSET REGISTERS & RECORDS OF PROCESSING ACTIVITY (ROPAs)

BEREAVEMENT SERVICES - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIA ¹	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal/archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held manually and/or on electronic systems (including mobile devices)	Children (under 13) – parental consent normally required
External Services	Waste & Recycling Manager	Procedure/guidance on a range of matters	N/A	Supersedes previous version	Common Practice	Superseded	No	N/A	No	N/A	Electronic	N/A
External Services	Waste & Recycling Manager	Cemeteries Rules & Regulations	N/A	Permanent	Common Practice	Archive	No	N/A	No	N/A	Electronic	N/A
External Services	Waste & Recycling Manager	Burial Registration – bookings, interment details, correspondence etc.	N/A	Permanent	Statutory	Archive	Yes - (identifiable natural persons only) – name, address, contact details	Public interest task pursuant to: Local Authorities' Cemeteries Order 1977 (as amended)	No	N/A	Paper copy & electronically in BACAS	N/A
External Services	Waste & Recycling Manager	Grave Register – grave data/ownership details, deceased information	N/A	Permanent	Statutory	Archive	Yes - (identifiable natural persons only) – name, address, contact details	Legal obligation compliance pursuant to: Local Authorities' Cemeteries Order 1977 (as amended)	No	N/A	Electronic	N/A
External Services	Waste & Recycling Manager	Burial Register - record stating the date and place an individual was buried	N/A	Permanent	Statutory	Archive	No – deceased information	N/A	No	N/A	Electronic Publicly accessible on request	N/A

¹ When building new IT systems for storing or accessing personal data, developing legislation, policy or strategies that have privacy implications, embarking on a data sharing initiative; or using data for new purposes, evaluation or scoring, including profiling, automated decision-making, systematic monitoring of individuals, processing sensitive data, processing data on a large scale, matching or combining datasets, processing data concerning vulnerable data subjects, innovative use or application of technological or organisational solutions, data transfer across borders outside the EU, when the processing in itself “prevents data subjects from exercising a right or using a service or a contract

BEREAVEMENT SERVICES - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIA	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal/archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held manually and/or on electronic systems (including mobile devices)	Children (under 13) - parental consent normally required
External Services	Waste & Recycling Manager	Exhumations – disinterment' correspondence etc.	N/A	Permanent	Statutory	Archive	Yes - (identifiable natural persons only) – name, address, contact details	Public interest task: Legal obligation compliance pursuant to: Burial Act 1857	No	N/A	Paper copy & electronic - BACAS	N/A
External Services	Waste & Recycling Manager	Memorial Management –correspondence etc.	N/A	Permanent	Common Practice	Archive	Yes - (identifiable natural persons only) – name, address, contact details	Contract: Public interest task pursuant to: Local Authorities' Cemeteries Order 1977 (as amended)	No	N/A	Paper copy & electronic - BACAS	N/A
External Services	Waste & Recycling Manager	Cemetery Plans	N/A	Permanent	Common Practice	Archive	No	N/A	No	N/A	Paper copy	N/A
External Services	Waste & Recycling Manager	Closed Churchyards – records - St Marys, St Margaret's, Holy Trinity, St Edmunds Pleasance	N/A	Permanent	Statutory	Archive	No	N/A)	No	N/A	Paper copy	N/A
External Services	Waste & Recycling Manager	Local Government & Social Care Ombudsman - complaints received and outcomes	N/A	1 year from date of case closure unless exceptional circumstances require longer retention e.g. pending court case	Common Practice	Secure disposal	Yes - (identifiable natural persons only) – name, address, contact details	Public interest task – Local Government Act 1974	Yes – racial/ ethnic origin,	Substantial public interest task – Section 26(5) Local Government Act 1974	Paper copy &/or Electronic - Idocs	N/A

BEREAVEMENT SERVICES - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIA	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal/archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held manually and/or on electronic systems (including mobile devices)	Children (under 13) - parental consent normally required
External Services	Waste & Recycling Manager	Complaints -- case file management – correspondence etc.	N/A	2 years from date of case closure unless exceptional circumstances require longer retention e.g. pending court case	Common Practice	Secure Disposal	Yes - (identifiable natural persons only) – name, address, contact details	Public interest task pursuant to: Local Authorities' Cemeteries Order 1977 (as amended)	No	N/A	Paper copy &/or electronic - Idocs	N/A
External Services	Waste & Recycling Manager	Correspondence (general) – emails, letters, memos etc.	N/A	1 year unless considered important for future reference	Common Practice	Secure Disposal	Yes - (identifiable natural persons only) – name, address, contact details	Public interest task pursuant to: Local Authorities' Cemeteries Order 1977 (as amended)	No	N/A	Paper copy &/or electronic - Idocs	N/A
External Services	Waste & Recycling Manager	Performance Indicators - statistical information (anonymised)	N/A	If a performance indicator is no longer required, deactivate and archive the indicator and delete from Pentana after 1 year	Common Practice	Disposal	No	N/A	No	N/A	Electronic - Pentana	N/A

BEREAVEMENT SERVICES - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

TECHNICAL & ORGANISATIONAL SECURITY MEASURES

Strategic Directorate	Information Asset Owner	IT Systems	Security Measures
External Services	I.C.T. Manager	Idocs/UNIFORM/Academy and department computers and laptops/Internet/Intranet – maintenance and administration	Password administration, data encryption, implementation of PSN based email services, IT services contingency planning, firewall barriers to hackers, virus protection software, full back-up, rescue disks, security audits, regular testing, assessing and evaluating the effectiveness of technical and organisational measures for ensuring the security of the processing, corporate guidance on organisational/security measure, DPIAs
External Services	Policy & Corporate Support Manager	Pentana – maintenance & administration	BS ISO/IEC 27001:2013 compliant
External Services	Waste & Recycling Manager	BACAS/Idocs/UNIFORM Academy/Pentana and computers and laptops/Internet/Intranet - – input of data – the landlord & tenant function	Use of passwords
External Services	Customer Services Manager	On-line payments (hosted by Capita)	PCIDSS compliant
External Services	Waste and Parks Manager	Disaster recovery	See Business Continuity Plan
External Services	Waste & Recycling Manager	CCTV	A key part of the Council's security measures

BEREAVEMENT SERVICES - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

CONSENT, OUTSIDE EEA TRANSFERS, DATA PROCESSOR AND RISKS

Categories of data subject	Recipients of personal	If lawful basis for processing is CONSENT -is procedure in place for explicit consent and withdrawal of consent	Outside EEA Transfers if yes – have you checked contractual requirements?	Data Processor (i.e. processing undertaken by a third party under contract) & ISAs	Data Processor Contract Checked - to be varied to incorporate 2018 DPA requirements	Marketing	Portability	Risk category (to be mapped in accordance with the Council's corporate/strategic risk impact table) Operational Risk Register updated YES/NO
Identifiable natural persons such as leaseholders, tenants, complainants, applicants, service users etc.	1.Council department(s) 2.Courts/tribunals etc. 3.Ombudsman 4.Stone Masons 5.Undertakers 6.Solicitors 7.Councillors 8.Member of Parliament	N/A	N/A	Pentana – Cloud based – retention only Kent & Medway Information Sharing Agreement	Pentana - BS ISO/IEC 27001:2013-compliant K&MISA - compliant	N/A	N/A	YES – LOW – risk score 2

BUILDING CONTROL - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIA ¹	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal /archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held manually and/or on electronic systems (including mobile devices)	Children (under 13) – parental consent normally required
External Services	Building Control Manager	Procedure/guidance on a range of matters	Applicable if policy or strategies have privacy implications	Supersedes preceding version	Common Practice	Archive	No	N/A	No	N/A	Electronic – Idox	No
External Services	Building Control Manager	Competent Persons Register	N/A	Permanent	Statutory	Archive	Yes - identifiable natural persons only) - name, address, contact details	Scheme approved by HCLG	No	N/A	Electronic – Idox	No
External Services	Building Control Manager	Initial Notices Register	N/A	Permanent	Statutory	Archive	Yes - identifiable natural persons only) - name, address, contact details	Scheme approved by HCLG	No	N/A	Electronic – Idox	No
External Services	Building Control Manager	Building Control application process – case file material including application forms, drawings specifications, correspondence, decision notices completion certificates, structural engineer details etc.	N/A	Permanent	Statutory	Archive	Yes - identifiable natural persons only) - name, address, contact details	Public interest task pursuant to: Building Act 1984 Building (Approved Inspectors Etc.) Regulations 2010 Building Regulations 2010	No	N/A	Electronic – Idox	No
External Services	Building Control Manager	Building works' inspection – correspondence, inspection records, inspection certificates, diaries etc.	N/A	Permanent	Statutory	Archive	Yes - identifiable natural persons only) - name, address, contact details	Public Interest task pursuant to: Building Act 1984 Building (Approved Inspectors Etc.) Regulations 2010 Building Regulations 2010	No	N/A	From 2005 onwards – electronically in the Idox A 'back' catalogue of documents 'post' 1994 – electronically in Idox	No

¹ When building new IT systems for storing or accessing personal data, developing legislation, policy or strategies that have privacy implications, embarking on a data sharing initiative; or using data for new purposes, evaluation or scoring, including profiling, automated decision-making, systematic monitoring of individuals, processing sensitive data, processing data on a large scale, matching or combining datasets, processing data concerning vulnerable data subjects, innovative use or application of technological or organisational solutions, data transfer across borders outside the EU, when the processing in itself "prevents data subjects from exercising a right or using a service or a contract

BUILDING CONTROL - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIA	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal/archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held manually and/or on electronic systems (including mobile devices)	Children (under 13) - parental consent normally required
External Services	Building Control Manager	The process of building control enforcement – case file material including contravention notices etc.	N/A	3 years from closure of case file unless considered important for future reference	Statutory	Archive	Yes - identifiable natural persons only) - name, address, contact details	Public interest task pursuant to: Building Act 1984 Building (Approved Inspectors Etc.) Regulations 2010 Building Regulations 2010	Yes - racial or ethnic origin, offences (including alleged offences) criminal proceedings outcomes and sentences (as applicable)	Substantial public interest (Building Act 1984)	Paper copy &/or electronically	No
External Services	Building Control Manager	Structural Engineers details & calculations Architects drawings Specialist consultants (e.g. Mechanical engineering etc. Pre-existing underground services etc.	N/A	Permanent	Common Practice	Archive	Yes - identifiable natural persons only) - name, address, contact details	Public interest task pursuant to: Building Act 1984 Building (Approved Inspectors Etc.) Regulations 2010 Building Regulations 2010	No	N/A	Electronic	No
External Services	Building Control Manager	Performance Indicators – for the building control function	N/A	If a performance indicator is no longer required, deactivate and archive the indicator and delete from Pentana after 1 year	Common Practice	Delete	No	N/A	No	N/A	Electronic - Pentana	N/A
		Fire Safety – 2005 Order consultation with Fire Brigade - case file material	N/A	Permanent	Statutory	Archive		Public interest task/legal obligation – Regulatory Reform (Fire Safety) Order 2005				

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External Services	Building Control Manager	General correspondence – emails, letters, memos etc.	N/A	1 year unless considered important for future reference	Common Practice	Secure disposal	Yes - identifiable natural persons only) - name, address, contact details	Public interest task pursuant to: Building Act 1984 Building (Approved Inspectors Etc.) Regulations 2010 Building Regulations 2010	No	N/A	Electronic	No
External Services	Building Control Manager	Dangerous Structures – case file material	N/A	Permanent	Statutory	Archive	Yes - identifiable natural persons only) - name, address, contact details	Public interest task – Local Government (Miscellaneous Provisions) Act 1976	No	N/A	Electronic	No
External Services	Building Control Manager	Demolitions – counter notices - case file material etc.	N/A	Permanent	Statutory	Secure disposal	Yes - identifiable natural persons only) - name, address, contact details	Public interest task – Building Regulations 2010	No	N/A	Electronic	No
External Services	Building Control Manager	Microfiche case records- Drawings, calculations, inspection notes, case file material etc.	N/A	Permanent	Common Practice	Archive	Yes - identifiable natural persons only) - name, address, contact details	Public interest task – Building Regulations 2010	No	N/A	Microfiche and Electronic	No
External Services	Building Control Manager	Means of escape from fire – consultation with Fire Brigade, notices, case file material	N/A	Permanent	Statutory	Archive	Yes - identifiable natural persons only) - name, address, contact details	Public interest task – Building Regulations 2010	No	N/A	Electronic	No

BUILDING CONTROL - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIA	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal/archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held manually and/or on electronic systems (including mobile devices)	Children (under 18) -
External Services	Building Control Manager	Safeguarding Referrals (children & adults at risk)	Yes	Delete immediately following receipt by KCC	Common Practice	Secure Disposal	Yes – (identifiable natural persons only) - name , address, contact details	Public interest task/legal obligation – Children Act 2004/Care Act 2014 Statutory Guidance - Working Together to Safeguard Children Children Care & Support Statutory Guidance	Yes – health data, offences (including alleged offences)	Substantial public interest /legal obligation – Children Act 2004/Care Act 2014 - Working Together to Safeguard Children Care & Support Statutory Guidance	Paper copy &/or electronic	Yes

BUILDING CONTROL - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

TECHNICAL & ORGANISATIONAL SECURITY MEASURES

Strategic Directorate	Information Asset Owner	IT Systems	Security Measures
External Services	I.C.T. Manager	Computer systems/laptops/Internet/Intranet/UNIFORM/Idox – maintenance and administration	Password administration, data encryption, implementation of PSN based email services, IT services contingency planning, firewall barriers to hackers, virus protection software, full back-up, rescue disks, security audits, regular testing, assessing and evaluating the effectiveness of technical and organisational measures for ensuring the security of the processing, corporate guidance on organisational/security measure, DPIAs
Internal Services	Customer Services Manager	On-line payments	PCIDSS compliant
Internal Services	Policy & Corporate Support Manager	Pentana – maintenance & administration	BS ISO/IEC 27001:2013 compliant
External Services	Building Control Manager	Pentana/UNIFORM/Idox/Internet/Intranet – input of data – the building control function	Password administration
External Services	Building Control Manager	Disaster Recovery	In accordance with the Business Continuity Plan
External Services	Enforcement & Regulatory Services Manager	CCTV – maintenance and administration	A key part of the Council's security setup

BUILDING CONTROL - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

CONSENT, OUTSIDE EEA TRANSFERS, DATA PROCESSOR, MARKETING AND RISKS

Categories of data subjects	Recipients of personal data	If lawful basis for processing is CONSENT -is procedure in place for explicit consent and withdrawal of consent	Outside EEA Transfers YES/NO –if yes - check contractual requirements	Data Processor (i.e. processing undertaken by a third party under contract) & ISAs	Data Processor Contract Checked - to be varied to incorporate 2018 DPA requirements	Marketing	Risk category (to be mapped in accordance with the Council's corporate/strategic risk impact table) Operational Risk Register updated – YES/NO
Identifiable natural persons such as leaseholders, tenants, complainants, applicants, employees, service users, agents etc.	1.Council department(s) 2.Ombudsman 3.Courts 4.Fire Brigade	YES – see Marketing – soft opt in rule (PECR) contact details obtained by the Council at the planning application stage, a similar service (the building control service) is being marketed & planning applicant is given the opportunity to opt out of marketing at the point at which his/her personal information is collected and subsequently in every email message after that)	N/A	Pentana – Cloud based – retention only Secure Waste Disposal - no processing	Pentana - BS ISO/IEC 27001:2013 compliant Secure Waste Disposal – confidentiality clause in contract	YES (soft opt in rule) - access to planning applicants' database (excluding pre-apps) -	YES – low – risk score 3

CORONAVIRUS – COVID - 19 INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIA ¹	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal/archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held Paper copy and/or on electronic systems (including mobile devices)	Children (under 13) – parental consent normally required
External Services	Head of Housing	Vulnerable Persons Service – list of clinically vulnerable individuals	N/A	For the duration of the COVID -19 pandemic and up to three (3) months following notification from Central Government that there is no longer a pandemic	Common Practice	Secure disposal	Yes- (identifiable natural persons only) - name, address, contact details, age etc.	<ul style="list-style-type: none"> is necessary in order to protect the vital interests of yourself or another person (Article 6(1)(d) and 9(2)(c) GDPR); necessary for the performance of a task carried out in the public interest (Article 6(1)(e) GDPR); necessary for the reasons of substantial public interest (Article 9(2)(g) GDPR); in the interest of public health (Article 9(2)(i) GDPR) 	Yes- health indicators (mental health status, physical activity status)	Substantial public interest (Article 9(2)(g) GDPR)	Paper copy & electronic	N/A
Internal Services	Policy & Corporate Support Manager	Ditto										
Internal Services	Electoral Registration Manager	Ditto										
Internal Services	Policy & Corporate Support Manager	'Dartford Together' – list of volunteers	N/A	Ditto	Common Practice	Secure disposal	Yes (identifiable natural persons only) - name, address, contact details	Ditto	No	N/A	Paper copy and/or electronic	N/A
Internal Services	Electoral Registration Manager	Ditto										

CORONAVIRUS – COVID - 19 INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

TECHNICAL & ORGANISATIONAL SECURITY MEASURES

Strategic Director ate	Information Asset Owner	IT Systems	Security Measures
Internal Services	I.C.T. Manager	ldox/UNIFORM and department computers and laptops/internet/intranet –maintenance and administration	Password administration, data encryption, implementation of PSN based email services, IT services contingency planning, firewall barriers to hackers, virus protection software, full back-up, rescue disks, security audits, regular testing, assessing and evaluating the effectiveness of technical and organisational measures for ensuring the security of the processing, corporate guidance on organisational/security measure, DPIAs, DPA compliant contracts

See [Coronavirus – COVID-19 Privacy Notice](#)

CUSTOMER SERVICES - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIA ¹	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal/archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held manually and/or on electronic systems (including mobile devices)	Children (under 13) – parental consent normally required
Internal Services	Customer Services Manager	Procedure/guidance on a range of matters	Applicable if policy or strategies have privacy implications	Supersedes preceding version	Common Practice	Archive	No	N/A	No	N/A	Electronic	No
Internal Services	Customer Services Manager	Telephone recording – outgoing & incoming calls for quality and training purposes	N/A	3 months from date of recording unless exceptional circumstances require a longer retention	Common Practice	Secure disposal	Yes - identifiable natural persons only) - name, address, contact details/ financial data	Public interest	No	N/A	Audio	No
Internal Services	Customer Services Manager	CCTV (Reception Area) – for protection of staff, visitors & DBC assets/premises	Yes	3 days from date of recording (unless required for evidential purposes)	Common Practice	Secure disposal	Yes - images	Public interest	No	N/A	Digital Recording	No
Internal Services	Customer Services Manager	CRM - database of contacts and associated phone calls	Yes	15 months (from April 2018)	Common Practice	Auto archive from April 2018	Yes - identifiable natural persons only) - name, address, contact details	Public interest	No	N/A	Electronic	No

¹ When building new IT systems for storing or accessing personal data, developing legislation, policy or strategies that have privacy implications, embarking on a data sharing initiative; or using data for new purposes, evaluation or scoring, including profiling, automated decision-making, systematic monitoring of individuals, processing sensitive data, processing data on a large scale, matching or combining datasets, processing data concerning vulnerable data subjects, innovative use or application of technological or organisational solutions, data transfer across borders outside the EU, when the processing in itself "prevents data subjects from exercising a right or using a service or a contract

CUSTOMER SERVICES - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIA	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal/archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held manually and/or on electronic systems (including mobile devices)	Children (under 13) - parental consent normally required
Internal Services	Customer Services Manager	Customer satisfaction surveys	N/A	1 year from date of receipt	Common Practice	Secure disposal & deletion of electronic records	Yes - identifiable natural persons only) - name, address, contact details	Public interest)	No	N/A	Paper copy &/or electronically	
Internal Services	Customer Services Manager	PV List Database - restricted database of potential violent persons used for staff protection	Yes	Reviewed every 6 months –once off the register the record will be deleted after three months	Common Practice	Deletion of electronic records	Yes - identifiable natural persons only) - name, address, contact details	Public interest	Yes – alleged offences	Substantial public interest (prevention/ detection of crime)	Electronic	No
Internal Services	Customer Services Manager	Residents' Parking Scheme Scratch Card Allocation – permit booklet	N/A	6 months from date of issue	Common Practice	Deletion of electronic records	Yes - identifiable natural persons only) - name, address, contact details	Public interest	No	N/A	Electronic	No
Internal Services	Customer Services Manager	Garage – Waiting Lists - database	N/A	Until garage tenancy granted	Common Practice	Deletion of electronic records	Yes - identifiable natural persons only) - name, address, contact details	Public interest	No	N/A	Electronic	No

CUSTOMER SERVICES - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIA	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal/archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held manually and/or on electronic systems (including mobile devices)	Children (under 13) - parental consent normally required
Internal Services	Customer Services Manager	Access to Civic Centre Control System – contractors and visitor access	N/A	Contractors - until expiry of pass Visitors- deleted on a daily basis	Common Practice	Deletion of electronic records	Yes – name and organisation	Public interest	No	N/A	Electronic	No
Internal Services	Customer Services Manager	Completed Secure Payment Envelopes & Cheque Counterfoils, correspondence – for payment of Council Services	N/A	3 months from date of processing	Common Practice	Secure disposal	Yes - identifiable natural persons only) - name, address, contact details	Public interest	No	N/A	Paper copy	No
Internal Services	Customer Services Manager	Performance Indicators – anonymised database	N/A	1 year from date of entry on Pentana	Common Practice	Electronic disposal	No	N/A	No	N/A	Electronic - Pentana	No
Internal Services	Customer Services Manager	General correspondence – emails, letters, memos etc.	N/A	1 year unless considered important for future reference	Common Practice	Secure disposal	Yes - identifiable natural persons only) - name, address, contact details	Public interest	No	N/A	Paper copy/electronic	No

CUSTOMER SERVICES - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

TECHNICAL & ORGANISATIONAL SECURITY MEASURES

Strategic Directorate	Information Asset Owner	IT Systems	Security Measures
Internal Services	I.C.T. Manager	Computer systems/laptops/Internet – maintenance and administration	Password administration, data encryption, implementation of PSN based email services, IT services contingency planning, firewall barriers to hackers, virus protection software, full back-up, rescue disks, security audits, regular testing, assessing and evaluating the effectiveness of technical and organisational measures for ensuring the security of the processing, corporate guidance on organisational/security measure, DPIAs
Internal Services	I.C.T. Manager	CRM - maintenance and administration	
Internal Services	Customer Services Manager	Payment related sensitive data	Capita - advanced income management
Internal Services	Customer Services Manager	Telephone recording	Specialist recording system, integrated with telephone system, providing controlled access to recordings to authorised persons only
Internal Services	Customer Services Manager	On-line payments (hosted by Capita)	PCIDSS compliant
Internal Services	Policy & Corporate Support Manager	Pentana – maintenance & administration	BS ISO/IEC 27001:2013 compliant
Internal Services	Customer Services Manager	Pentana – input of data –	Password administration
Internal Services	Customer Services Manager with IT Services support	Disaster recovery	See Business Continuity Plan
External Services	Enforcement & Regulatory Services Manager	CCTV – maintenance and administration	A key part of the Council's security setup

CUSTOMER SERVICES - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

CONSENT, OUTSIDE EEA TRANSFERS, DATA PROCESSOR, MARKETING AND RISKS

Categories of data subjects	Recipients of personal/sensitive data	If lawful basis for processing is CONSENT -is procedure in place for explicit consent and withdrawal of consent	Outside EEA Transfers YES/NO –if yes - check contractual requirements	Data Processor (i.e. processing undertaken by a third party under contract) &/or use of external servers as hosts & ISAs	Data Processor Contract Checked - to be varied to incorporate 2018 DPA requirements	Marketing	Risk category (to be mapped in accordance with the Council's corporate/strategic risk impact table) Operational Risk Register updated – YES/NO
Identifiable natural persons such as leaseholders, tenants, complainants, applicants, employees, service users etc.	1.Council department(s)	N/A	N/A	Pentana – Cloud based – retention only Secure Waste Disposal - no processing	Pentana - BS ISO/IEC 27001:2013 compliant Secure Waste Disposal – confidentiality clause in contract	N/A	High Score – 6 Operational Risk Register updated

Electoral Registration	Information Asset Owner	Record/Information Description	Retention Period	Statutory or Common Practice	Action at end of retention e.g. disposal or archive	Personal Data	Lawful Basis for Processing Personal Data	Sensitive Personal Data	Lawful Basis for Processing Sensitive Personal Data	Children (under 13) - parental consent required	Held manually and/or on electronic systems (including mobile devices) - list systems/devices	Recipients (including internal Council departments) of personal/sensitive data	Data Processor (i.e. processing undertaken by an external organisation under contract)	Data Processor Contract/ISA Checked - to be varied to incorporate GDPR requirements & ISAs
Electoral Registration Officer Civic Centre Home Gardens Dartford Kent DA1 1DR	ELECTORAL PROCESS													
ELECTORAL REGISTRATION														
Electoral Registration Officer	Electoral Services Manager	Application Forms (ITR)												
		Paper Applications	1 year from month of application	Statutory	Secure disposal	Yes -name, address, date of birth, NI number, email address	Public interest task - Representation of the People Act 1983 - Representation of the People Regulations 2001 - Legal obligation	Yes -nationality	Substantial public interest -Representation of the People Act 1983 - Representation of the People Regulations 2001 - Legal obligation	No	Manually	Digital Service/Department for Work & Pensions	N/A	N/A
		Scanned Applications	Until no longer an elector at the application address NINO redacted after 12 months	Common Practice/Statutory	Archived	Yes -name, address, date of birth,NI number, email address	Public interest task - Representation of the People Act 1983 - Representation of the People Regulations 2001- Legal obligation	Yes-nationality	Substantial public interest -Representation of the People Act 1983 - Representation of the People Regulations 2001 - Legal obligation	No	Electronic (Halarose)	Digital Service/Department for Work & Pensions	Digital Service (Cabinet Office)	National Agreement
		Online Applications	Until no longer an elector at the application address	Common Practice	Archived	Yes -name, address, date of birth, NI number, email address	Public interest task - Representation of the People Act 1983 - Representation of the People Regulations 2001- Legal obligation	Yes -nationality	Substantial public interest -Representation of the People Act 1983 - Representation of the People Regulations 2001 - Legal obligation	No	Electronic (Halarose)	Digital Service/Department for Work & Pensions	Digital Service (Cabinet Office)	National Agreement
		Opt Out Request	Until no longer an elector at the application address	Common Practice	Archived	Yes -name, address, date of birth, NI number, email address	Public interest task - Representation of the People Act 1983 - Representation of the People Regulations 2001 - Legal obligation	No	N/A	No	Electronic (Halarose)	N/A	N/A	N/A
		Anonymous Applications	12 months	Statutory	Secure disposal	Yes -name, address, date of birth, NI number, email address	Public interest task - Representation of the People Act 1983 - Representation of the People Regulations 2001- Legal obligation	No	N/A	Yes	Manually	N/A	N/A	N/A
		ITR Data												
		Electronic data for printing	Until completed	Common practice	Secure disposal	Yes -name, address, date of birth, NI number, email address	Public interest task - Representation of the People Act 1983 - Representation of the People Regulations 2001 - Legal obligation	No	N/A	No	Electronic (Excel)	Doc Mail	Doc Mail	BS ISO/IEC 27001:2013
		Documentary Evidence												
		Original documents such as Passports/Driving Licences Etc.	Five days and copies taken and retained for 1 year	Statutory	Secure disposal	Yes -name, address, date of birth, NI number, email address	public interest task - Representation of the People Act 1983 Representation of the People Regulations 2001	Yes -nationality	Substantial public interest -Representation of the People Act 1983 - Representation of the People Regulations 2001 - Legal obligation	No	Manual	N/A	N/A	N/A
		Electronic documents such as Passports/Driving Licences etc.	Email for 6 months and copies taken and retained for 1 year form receipt	Statutory	Archive / Secure disposal	Yes -name, address, date of birth, NI number, email address	public interest task - Representation of the People Act 1983 - Representation of the People Regulations 2001- Legal obligation	Yes -nationality	Substantial public interest -Representation of the People Act 1983 - Representation of the People Regulations 2001 - Legal obligation	No	Outlook / Manual	N/A	N/A	N/A
		Notice of Death												
		Death Certificate	Five days and copies taken and retained for 1 year	Common Practice	Secure disposal	Yes -name, address, date of birth, NI number, email address	public interest task - Representation of the People Act 1983 Representation of the People Regulations 2001	No	N/A	No	Manual	N/A	N/A	N/A
		Notice of Death from Registrar	Until Register is archived	Common Practice	Archive	Yes- name, address, date of birth,NI number, email address	public interest task - Representation of the People Act 1983 -Representation of the People Regulations 2001- Legal obligation	No	N/A	No	Tell Us Once/Halarose	Government Gateway	n/a	n/a
		Data NINO number, email addressng (Receiving Data) - Comparisons with other data sources												
		Nursing Home Data	Until data processes on council system	Common Practice	Secure disposal	Yes -name, address, date of birth, NI number, email address	public interest task - Representation of the People Act 1983 - Representation of the People Regulations 2001- Legal obligation	Yes -nationality	Substantial public interest -Representation of the People Act 1983 - Representation of the People Regulations 2001 - Legal obligation	No	Electronic (Excel)	KCC	N/A	N/A
		Educational Data	Until data processes on council system	Common Practice	Secure disposal	Yes -name, address, date of birth, NI number, email address	Public interest task - Representation of the People Act 1983 - Representation of the People Regulations 2001 - Legal obligation	Yes -nationality	Substantial public interest -Representation of the People Act 1983 - Representation of the People Regulations 2001 - Legal obligation	No	Electronic (Excel)	KCC	N/A	N/A
		Council Tenants List	Until data processes on council system	Common Practice	Secure disposal	Yes -name, address, date of birth,NI number, email address	Public interest task - Representation of the People Act 1983 - Representation of the People Regulations 2001- Legal obligation	No	N/A	No	Electronic (Excel)	Housing Services (DBC)	Data Sharing Agreement	Data Sharing Agreement

		Empty Property Lists	Until data processes on council system	Common Practice	Secure disposal	No	Public interest task - Representation of the People Act 1983 - Representation of the People Regulations 2001 - Legal obligation	No	N/A	No	Electronic (Excel)	Council Tax (SDC & DBC Shared Services)	Shared Services Agreement	Shared Services Agreement
		Housing Records	Until data processes on council system	Common Practice	Secure disposal	No	Public interest task - Representation of the People Act 1983 - Representation of the People Regulations 2001 - Legal obligation	Yes -nationality	Substantial public interest -Representation of the People Act 1983 - Representation of the People Regulations 2001 - Legal obligation	No	Electronic (Academy)	Housing Services (DBC)	Data Sharing Agreement	Data Sharing Agreement
		Information obtained by the ERO from Dartford Revenues and Benefits Services	12 months of receipt	Common Practice	Secure disposal	Yes- name, address, date of birth, NI number, email address	Public interest task - Representation of the People Act 1983 - Representation of the People Regulations 2001 - Legal obligation	Yes-nationality	Substantial public interest -Representation of the People Act 1983 - Representation of the People Regulations 2001 - Legal obligation	No	Academy/Idox	Revenues & Benefits (SDC & DBC Shared Services)	Shared Services Agreement	Shared Services Agreement
ANNUAL CANVASS														
Electoral Registration Officer		Household Enquiry Form (HEF) Data												
		Data processed by data process (Printing)	Until completed	Common Practice	Secure disposal	Yes - name, address, date of birth, NI number, email address	Public interest task - Representation of the People Act 1983 -Representation of the People Regulations 2001 - Legal obligation	Yes -nationality	Substantial public interest -Representation of the People Act 1983 - Representation of the People Regulations 2001 - Legal obligation	No	Electronic (Excel)	Print UK (Contract being reviewed)	Print UK	BS ISO/IEC 27001:2013
		Register of Electors	Until archived	Common Practice	Archive	Yes - name, address, date of birth, NI number, email address	Public interest task - Representation of the People Act 1983- Representation of the People Regulations 2001 - Legal obligation	Yes-nationality	Substantial public interest -Representation of the People Act 1983 - Representation of the People Regulations 2001 - Legal obligation	No	Electronic (Excel)	Idox	Idox	N/A
		Online Responses	Until archived	Common Practice	Archive	Yes - name, address, date of birth, NI number, email address	Public interest task - Representation of the People Act 1983 - Representation of the People Regulations 2001 - Legal obligation	Yes -nationality	Substantial public interest -Representation of the People Act 1983 - Representation of the People Regulations 2001 - Legal obligation	No	Electronic (Hera)	Idox	Idox	N/A
Canvassers														
		Employment Information	Until provided to Payroll	Common Practice	Secure disposal	Yes - name, address, date of birth, NI number, email address	Necessary for the performance of a contract with data subject	Yes -nationality	Substantial public interest - DAP 2018 Schedule 1, Part 1 condition- contract obligations	No	Manually/electronic	Mid Kent Services	Mid Kent Services	Shared Payroll Service Collaboration Agreement
		HEFs Forms	Until delivered	Common Practice	Secure disposal	Yes - name, address, date of birth, NI number, email address	Public interest task - Representation of the People Act 1983 - Representation of the People Regulations 2001 - Legal obligation	No	N/A	No	Manually	Canvasser	N/A	N/A
		ITR applications (outgoing)	Until delivered	Common Practice	Secure disposal (as above)	Yes - name, address, date of birth, NI number, email address	Public interest task - Representation of the People Act 1983 - Representation of the People Regulations 2001 - Legal obligation	No	N/A	No	Manually	Canvasser	N/A	N/A
		ITR applications (Incoming)	Until delivered	Common Practice	Secure disposal (as above)	Yes - name, address, date of birth, NI number, email address	Public interest task - Representation of the People Act 1983 Representation of the People Regulations 2001 - Legal obligation	Yes -nationality	Substantial public interest -Representation of the People Act 1983 - Representation of the People Regulations 2001 - Legal obligation	No	Manually	Canvasser	N/A	N/A
		Response Lists	Until Canvass completed	Common Practice	Secure disposal	Yes - name, address, date of birth,NI number, email address	Public interest task - Representation of the People Act 1983 - Representation of the People Regulations 2001 - Legal obligation	No	N/A	No	Electronic (PDF)	Canvasser	N/A	N/A
ABSENT VOTING														
Electoral Registration Officer	Electoral Services Manager	Postal Vote Applications	Until no longer an elector at registered address	Common Practice	Secure disposal	Yes - name, address, date of birth, NI number, email address	Public interest task - Representation of the People Act 1983 - Representation of the People Regulations 2001 - Legal obligation	Yes -nationality	Substantial public interest -Representation of the People Act 1983 - Representation of the People Regulations 2001 - Legal obligation	No	Manually & Electronically (Eros)	N/A	N/A	N/A
		Proxy Applications	Until no longer an elector at registered address	Common Practice	Secure disposal	Yes - name, address, date of birth, NI number, email address	Public interest task - Representation of the People Act 1983 - Representation of the People Regulations 2001 - Legal obligation	Yes- natonality	Substantial public interest -Representation of the People Act 1983 - Representation of the People Regulations 2001 - Legal obligation	No	Manually & Electronically (Eros)	N/A	N/A	N/A
		Waiver Applications	Until no longer an elector at registered address	Common Practice	Secure disposal	Yes - name, address, date of birth, NI number, email address	Public interest task - Representation of the People Act 1983 - Representation of the People Regulations 2001 - Legal obligation	Yes- natonality	Substantial public interest -Representation of the People Act 1983 - Representation of the People Regulations 2001 - Legal obligation	No	Manually & Electronically (Eros)	N/A	N/A	N/A
WARDS & BOUNDARIES														
Electoral Registration Officer	Electoral Services Manager	Records created by the process of managing wards & boundaries	Superseded by revised versions	Common Practice	Archived	Yes - name, address, date of birth, NI number, email address	Public interest task - Representation of the People Act 1983 - Representation of the People Regulations 2001 - Legal obligation	No	N/A	No	Electronically (PDF & Excel)	Boundary Commission Local Government Boundary Commission	N/A	N/A

Electoral Registration Officer	Electoral Services Manager	Review of Polling Districts and Polling Places	Superseded by revised versions	Common Practice	Archived	No	N/A	No	N/A	No	Electronically (Word, Email, Web forms)	Public Inspection	N/A	N/A
Electoral Registration Officer	Electoral Services Manager	Community Governance Reviews	Superseded by revised versions	Common Practice	Archived	Yes - name, address, date of birth, NI number, email address	N/A	No	N/A	No	Electronically (Word, Email, Web forms)	Public Inspection	N/A	N/A
ELECTORAL REGISTER														
Electoral Registration Officer	Electoral Services Manager	Register of Electors (full) and alterations or relevant parts	Permanent - stored by Dartford Borough Council	Statutory	Archived	Yes - name, address, date of birth, NI number, email address	Public interest task - Local Government Act 1972, Representation of the People Acts 1983, 1985 and 2000, Political Parties, Elections and Referendums Act 2000, Local Government Act 2000, Representation of the People (England and Wales) Regulations 2001, Representation of the People (Combination of Polls) (England and Wales) Regulations 2004, Local Elections (Principal Areas) (England and Wales) Rules 2006, Electoral Administration Act 2006, Local Elections (Parishes and Communities) (England and Wales) Rules 2006, Political Parties and Elections Act 2009, Local Democracy, Economic Development and Construction Act 2009,	No	N/A	No	Manually/Electronic (PDF & Excel)	Public Inspection (current only) Returning Officer Dartford Borough Council Elected Representatives Parish Councils Registered Political Groups Credit Reference Agencies Electoral Commission Boundary Commission for England Boundary Commission for Local Government British Library Office for National Statistics Jury Central Summoning Bureau Police & Crime Commissioner Local constituency parties	N/A	N/A
		Register of Electors (open) or relevant parts	Superseded by revised versions	Common Practice	Archived	Yes - name, address, date of birth, NI number, email address	ditto above	No	N/A	No	Manually / Electronically (PDF & Excel)	Public Inspection Upon purchase	N/A	N/A
		Inspection of Register Log	2 years from completion	Common Practice	Archived	Yes, Name address signature	Public interest task - Representation of the People Act 1983 - Representation of the People Regulations 2001 - Legal obligation	No	N/a	No	Manually	N/A	N/A	N/A
		Marked Registers	12 months from close of poll	Statutory	Secure disposal	Yes -name, address, date of birth	Public interest task - Representation of the People Act 1983 Representation of the People Regulations 2001- Legal obligation	Yes -nationality	Substantial public interest -Representation of the People Act 1983 - Representation of the People Regulations 2001 - Legal obligation	No	Manually/Electronic (PDF)	Political Parties Public Inspection Electoral Commission Police Forces Security Agencies	N/A	N/A

ENFORCEMENT & REGULATORY SERVICES- INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

Strategic Asset Owner – Enforcement and Regulatory Services Manager

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIAs ¹	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal/archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held Paper copy and/or on electronic systems (including mobile devices)	Children (under 13) – parental consent normally required
External Services	Enforcement & Regulatory Services Manager	Emergency Planning procedure/guidance	N/A	Supersedes previous version	Common Practice	Secure disposal	Yes- - (identifiable natural persons only) - name, address, contact details	Legal obligation - Civil Contingencies Act 2004	No	N/A	Paper copy & electronically	N/A
External Services	Community Safety Manager	Emergency Planning Response –collection of personal data for emergency planners and responders	N/A	Duration of the emergency recovery period (no longer than 3 years)	Common Practice	Secure disposal	Yes- - (identifiable natural persons only) - name, address, contact details	Public interest task - Civil Contingencies Act 2004	Yes – health data	Substantial public interest/Vital interests - Civil Contingencies Act 2004	Electronically	N/A
External Services	Community Safety Manager	CCTV, Body Camera Footage and Vehicle Dashcam – images and audio	Yes	31 days if not required for evidential purposes	Common Practice	Automated overwrite/secure disposal of physical copies	Yes (identifiable natural persons only) – images, number plates	Public interest task - Protection of Freedoms Act 2012/ Protection of Freedoms Act 2012 (Code of Practice for Surveillance Camera Systems and Specification of Relevant Authorities) Order 2013/1961 Surveillance Camera Code of Practice Section 29 Protection of Freedoms Act 2012	No	N/A	Electronically	N/A

¹ When building new IT systems for storing or accessing personal data, developing legislation, policy or strategies that have privacy implications, embarking on a data sharing initiative; or using data for new purposes, evaluation or scoring, including profiling, automated decision-making, systematic monitoring of individuals, processing sensitive data, processing data on a large scale, matching or combining datasets, processing data concerning vulnerable data subjects, innovative use or application of technological or organisational solutions, data transfer across borders outside the EU, when the processing in itself “prevents data subjects from exercising a right or using a service or a contract

ENFORCEMENT & REGULATORY SERVICES- INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

Strategic Asset Owner – Enforcement and Regulatory Services Manager

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIA	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal/archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held Paper copy and/or on electronic systems (including mobile devices)	Children (under 13) – parental consent normally required
External Services	Community Safety Manager	CCTV Activity Log	Yes	2 years (as may be required for Police evidence).	Common Practice	Deleted automatically via IT solution after 2 years	Yes (identifiable natural persons only) – images, number plates	Public interest task - Protection of Freedoms Act 2012/ Protection of Freedoms Act 2012 (Code of Practice for Surveillance Camera Systems and Specification of Relevant Authorities) Order 2013/1961 Surveillance Camera Code of Practice Section 29 Protection of Freedoms Act 2012	No	N/A	Electronically	N/A
External Services	Enforcement & Regulatory Services Manager	Local Government & Social Care Ombudsman – case file material - complaints received and outcomes	N/A	1 year from date of case closure unless exceptional circumstances require longer retention e.g. pending court case	Common Practice	Secure Disposal	Yes - (identifiable natural persons only) - name , address, contact details	Public interest task – Local Government Act 1974	Yes- health data, offences (including alleged offences) etc.	Substantial public interest – Section 26(5) Local Government Act 1974	Electronically	N/A
External Services	Enforcement & Regulatory Services Manager	RIPA - authorisations database	N/A	6 years from date of entry	Common Practice	Secure Disposal	Yes - (identifiable natural persons only) - name , address, contact details	Public interest task – Regulation of Investigatory Powers Act 2000	Yes- offences (including alleged offences) etc.	Substantial public interest – Regulation of Investigatory Powers Act 2000	Electronically	N/A

ENFORCEMENT & REGULATORY SERVICES- INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

Strategic Asset Owner – Enforcement and Regulatory Services Manager

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIA	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal/archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held Paper copy and/or on electronic systems (including mobile devices)	Children (under 13) – parental consent normally required
External Services	Community Safety Manager	Community Safety - case file material, community protection notices, reports, decisions etc.	N/A	2 years from date of case closure unless exceptional circumstances require longer retention e.g. pending court case or an appeal	Common Practice	Secure disposal of physical evidence/wiping of electronically held data	Yes (identifiable natural persons only) - name, address, contact details	Public interest task - Crime and Disorder Act 1998	Yes – racial or ethnic origin, state of health, offences (including alleged offences) criminal proceedings outcomes and sentences (as applicable)	Substantial public interest - Crime and Disorder Act 1998 Crime and Policing Act 2014	Paper copy & electronically	N/A
External Services	Community Safety Manager	Public Spaces Protection Order offences - Case file material	N/A	2 years from date of case closure unless exceptional circumstances require longer retention e.g. pending court case or an appeal	Common Practice	Secure disposal	Yes (identifiable natural persons only) - name, address, contact details	Public interest task - Anti-social Behaviour, Crime and Policing Act 2014 (Publication of Public Spaces Protection Orders) Regulations 2014/2591	Yes – racial or ethnic origin, state of health, offences (including alleged offences) criminal proceedings outcomes and sentences (as applicable)	Substantial public interest Anti-social Behaviour, Crime and Policing Act 2014 (Publication of Public Spaces Protection Orders) Regulations 2014/2591-	Paper copy & Electronically	N/A
External Services	Licensing Manager	Charity Street Collections – licence applications and all administration relating to the grant/refusal/renewal	N/A	Life of licence + 1 year	Common Practice	Secure disposal	Yes (identifiable natural persons only) - name, address, contact details	Public interest task - Section 5 of the Police, factories, etc. (Miscellaneous Provisions Act 1916)	No	N/A	Electronically	N/A

ENFORCEMENT & REGULATORY SERVICES- INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

Strategic Asset Owner – Enforcement and Regulatory Services Manager

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIA	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal/archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held Paper copy and/or on electronic systems (including mobile devices)	Children (under 13) – parental consent normally required
External Services	Licensing Manager	Licensing (Hackney Carriage & Private Hire) – case file material including applications, conditions, licences, notices, reviews, appeal decisions, prosecutions, statutory returns etc.	N/A	Destroy 2 years after file closure	Common Practice	Secure disposal	Yes (identifiable natural persons only) - name, address, contact details, immigration status	Public interest task - Town and Police Clauses Act 1847 Local Government (Miscellaneous Provisions) Act 1976 Air Quality (Taxis and Private Hire Vehicles Database) (England and Wales) Regulations 2019	Yes –, state of health, offences (including alleged offences) criminal proceedings outcomes and sentences (as applicable)	Substantial public interest Town and Police Clauses Act 1847 Local Government (Miscellaneous Provisions) Act 1976-	Electronically	N/A
External Services	Licensing Manager	Licensing (Hackney Carriage & Private Hire) – automated decision making – driver knowledge and English tests	N/A	Life of licence + 1 year	Common Practice	Secure disposal	Yes – test results	Public interest task - Town and Police Clauses Act 1847 Local Government (Miscellaneous Provisions) Act 1976	No	N/A	Paper copy & Electronically	N/A
External Services	Licensing Manager	Licensing Act 2003 (Alcohol) (Late night refreshment) & (Regulated Entertainment) – case file material – personal licences, premises licences, club premises certificates and temporary event notice including applications, conditions, notices, reviews, appeal decision, prosecutions etc. -	N/A	Life of licence + 1 year	Statutory	Secure Disposal	Yes (identifiable natural persons only) - name, address, contact details	Public interest task Licensing Act 2003 - Licensing Act 2003 (Late Night Refreshment) Regulations 2015/1781	Yes - offences (including alleged offences) criminal proceedings outcomes and sentences (as applicable)	Substantial public interest - Licensing Act 2003 Licensing Act 2003 (Late Night Refreshment) Regulations 2015/1781	Paper copy & Electronically	N/A

ENFORCEMENT & REGULATORY SERVICES- INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

Strategic Asset Owner – Enforcement and Regulatory Services Manager

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIA	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal/archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held Paper copy and/or on electronic systems (including mobile devices)	Children (under 13) - parental consent normally required
External Services	Licensing Manager	Gambling Act 2005 - case file material - premises licences, machine permits and certificates and temporary use notice including applications, conditions, notices, reviews, appeal decision, prosecutions etc. -	N/A	Life of licence + 1 year	Statutory	Secure Disposal	Yes (identifiable natural persons only) - name, address, contact details	Public interest task - Gambling Act 2005	Yes – offences (including alleged offences) criminal proceedings outcomes and sentences (as applicable)	Substantial public interest - Gambling Act 2005	Paper copy & Electronically	N/A
External Services	Licensing Manager	Scrap Metal Dealers Act 2013 - licences applications received and all administration relating to the grant/refusal /renewal	N/A	Life of licence + 1 year	Statutory	Secure Disposal	Yes (identifiable natural persons only) - name, address, contact details	Public interest task - Scrap Metal Dealers Act 2013	Yes – offences (including alleged offences) criminal proceedings outcomes and sentences (as applicable)	Substantial public interest - Scrap Metal Dealers Act 2013	Paper copy	N/A
External Services	Licensing Manager	Licensing Fees – schedule of	N/A	Supersedes preceding version	Common Practice	Archive	No	N/A	No	N/A	Paper copy & Electronically	N/A
External Services	Licensing Manager	Statements' of Licensing Policy	N/A	Supersedes preceding version	Common Practice	Archive	No	N/A	No	N/A	Paper copy & Electronically	N/A
External Services	Community Safety Manager	Dartford Town Against Crime (DTAC) Scheme - index of known offenders for business related crime i.e. shop theft	Yes	3 years	Common Practice	Secure disposal	Yes (identifiable natural persons only) - name, address, contact details	Public interest task - Crime and Disorder Act 1998 Crime and Policing Act 2014	Yes - offences (including alleged offences) criminal proceedings outcomes and sentences (as applicable)	Substantial public interest - Crime and Disorder Act 1998 Crime and Policing Act 2014	Electronically	N/A
External Services	Community Safety Manager	ShopSafe ID Scheme	Yes	3 Years	Common Practice	Secure Disposal	Yes- (identifiable natural persons only) name, address, contact details, medical issues	Public interest task- Information held with consent	Yes – medical diagnosis, medications and vulnerabilities	Substantial public interest - Information held with consent	Paper Copy & Electronically	N/A

ENFORCEMENT & REGULATORY SERVICES- INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

Strategic Asset Owner – Enforcement and Regulatory Services Manager

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIA	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal/archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held Paper copy and/or on electronic systems (including mobile devices)	Children (under 13) - parental consent normally required
External Services	Enforcement Manager	Litter Enforcement – case file material – instructions, court orders etc.	N/A	2 years from date of case closure unless exceptional circumstances require longer retention e.g. pending court case or an appeal	Common Practice	Secure disposal	Yes (identifiable natural persons only) - name, address, contact details	Public interest task - Environmental Protection Act 1990	Yes – racial or ethnic origin, state of health, offences (including alleged offences) criminal proceedings outcomes and sentences (as applicable)	Substantial public interest - Environmental Protection Act 1990	Held by Kingdom Litter Enforcement Contractors, within their web TM access system	N/A
External Services	Enforcement Manager	Environmental Crime Enforcement - case file material – instructions, court orders etc.	N/A	2 years from date of case closure unless exceptional circumstances require longer retention e.g. pending court case or an appeal	Common Practice	Secure disposal	Yes (identifiable natural persons only) - name, address, contact details	Public interest task – Anti-Social Behaviour Act 2003 Anti-Social Behaviour Crime and Policing Act 2014 Clean Neighbourhoods and Environment Act 2005 Environmental Protection Act 1990 Control of Pollution Act 1974 Refuse Disposal (Amenity) Act 1978 Town and Country Planning Act 1990	Yes – racial or ethnic origin, state of health, offences (including alleged offences) criminal proceedings outcomes and sentences (as applicable)	Substantial public interest	Paper copy &/or electronically in Idox	N/A

ENFORCEMENT & REGULATORY SERVICES- INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

Strategic Asset Owner – Enforcement and Regulatory Services Manager

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIA	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal/archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held Paper copy and/or on electronic systems (including mobile devices)	Children (under 13) - parental consent normally required
External Services	Enforcement Manager	Car Parking Enforcement – case file material – instructions, court orders, Penalty Charge Notices etc. PCN Schedule	N/A	2 years from date of case closure unless exceptional circumstances require longer retention e.g. pending court case or an appeal	Common Practice	Secure disposal	Yes (identifiable natural persons only) - name, address, contact details, vehicle registration number, vehicle ownership checks (through the DVLA), vehicle make and model, location of vehicles, images from body worn cameras	Public interest task - Traffic Management Act 2004 Civil Enforcement of Parking Contraventions (England) General Regulations 2007	Yes – racial or ethnic origin, state of health, offences (including alleged offences) criminal proceedings outcomes and sentences (as applicable)	Substantial public interest - Management Act 2004 Civil Enforcement of Parking Contraventions (England) General Regulations 2007	Paper copy &/or electronically in Idox and Parking Gateway (the IT platform for PC Notice Processing) (PCN number only – no car registration number or other personal details) Parkmobile (cashless parking)	N/A
External Services	Enforcement Manager	Resident permits, Business permits, dispensations, resident exceptions, season permits. Car Parking Visitors Scratch Cards	N/A	All these permits and associated details will be retained for 7 years for financial purposes, however, personal details will be deleted after 2 years Visitor scratch cards will be kept for 7 years. The data held by customer services regarding a scratch card request is held in the CRM for 13 months	Common Practice	Secure disposal	Yes - (identifiable natural persons only) - name, address, contact details	N/A	No	N/A	Paper copies are scanned electronically in Idox and Parking Gateway (the IT platform for PC Notice Processing) (PCN number only – no car registration number or other personal details) N/A for Parking Services. Finance and Customer Services keep their information	N/A

ENFORCEMENT & REGULATORY SERVICES- INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

Strategic Asset Owner – Enforcement and Regulatory Services Manager

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIA	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal/archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held Paper copy and/or on electronic systems (including mobile devices)	Children (under 13) – parental consent normally required
External Services	Enforcement & Regulatory Services Manager	Performance Indicators	N/A	If a performance indicator is no longer required, deactivate and archive the indicator and delete from Pentana after 1 year	Common Practice	Disposal	No	N/A	No	N/A	Electronic on Pentana	N/A
External Services	Enforcement & Regulatory Services Manager	Correspondence (general) – emails, letters, memos etc.	N/A	1 year unless considered important for future reference	Common Practice	Secure disposal	Yes - (identifiable natural persons only) - name, address, contact details	Public interest task –in accordance with the legislation referred to in this IAR (as applicable)	No	N/A	Paper copy &/or electronic	N/A
External Services	Community Safety Manager	CSU Daily Tasking – notes of meeting MARAC – Multi agency risk assessment conference	N/A	Reviewed and then destroyed	Common Practice	Secure Disposal	Yes -(identifiable natural persons only) – name, address, contact details	Public interest task - Anti-Social Behaviour Act 2003 Anti-Social Behaviour Crime and Policing Act 2014	Yes- alleged offences, criminal proceedings outcomes and sentences (as applicable)	Substantial public Interest Anti-Social Behaviour Act 2003 Anti-Social Behaviour Crime and Policing Act 2014	Electronic (email)	N/A

ENFORCEMENT & REGULATORY SERVICES- INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

Strategic Asset Owner – Enforcement and Regulatory Services Manager

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIA	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal/archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held Paper copy and/or on electronic systems (including mobile devices)	Children (under 13) - parental consent normally required
External Services	Enforcement Manager (Planning Enforcement)	High Hedges – case file material – correspondence, notices etc.	N/A	3 years	Common Practice	Secure disposal	Yes - (identifiable natural persons only) - name, address, contact details	Public interest task - Anti-Social Behaviour Act 2003	No	N/A	Paper copy &/or electronic	N/A
External Services	Enforcement & Regulatory Services Manager	Events' Notifications- management of crowd safely at events such as festivals and concerts	N/A	1 year from date of event	Common Practice	Disposal	Yes - (identifiable natural persons only) – name, address, contact details	Public interest task – Localism Act 2011 –section 1 Health & Safety Executive Guidance on running events safely Code of Practice on Environmental Noise Control at Concerts 1995 and legislation applying to permits, licences etc.	No	N/A	Electronic	N/A

ENFORCEMENT & REGULATORY SERVICES- INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

Strategic Asset Owner – Enforcement and Regulatory Services Manager

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIA	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal/archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held manually and/or on electronic systems (including mobile devices)	Children (under 18) -
External Services	Community Safety Manager	Safeguarding Referrals (children & adults at risk)	Yes	Delete immediately following receipt by KCC	Common Practice	Secure Disposal	Yes – (identifiable natural persons only) - name , address, contact details	Public interest task/legal obligation – Children Act 2004/Care Act 2014 Statutory Guidance - Working Together to Safeguard Children Care & Support Statutory Guidance	Yes – health data, offences (including alleged offences)	Substantial public interest task/legal obligation – Children Act 2004/Care Act 2014 - Working Together to Safeguard Children Care & Support Statutory Guidance	Paper copy &/or electronic	Yes

ENFORCEMENT & REGULATORY SERVICES- INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

Strategic Asset Owner – Enforcement and Regulatory Services Manager

TECHNICAL & ORGANISATIONAL SECURITY MEASURES

Strategic Directorate	Information Asset Owner	IT Systems	Security Measures
Internal Services	I.C.T. Manager	Idox/UNIFORM and department computers and laptops/on-line/telephone payment systems – maintenance and administration	Password administration, data encryption, implementation of PSN based email services, IT services contingency planning, firewall barriers to hackers, virus protection software, full back-up, rescue disks, security audits, regular testing, assessing and evaluating the effectiveness of technical and organisational measures for ensuring the security of the processing, corporate guidance on organisational/security measure, DPIAs, DPA contract provisions
Internal Services	Policy & Corporate Support Manager	Pentana – maintenance & administration	BS ISO/IEC 27001:2013 compliant
External Services	Enforcement & Regulatory Services Manager	Idox/UNIFORM/ /Pentana and computers and laptops/Internet/ Intranet – input of data – the enforcement & regulatory function	Use of passwords
Internal Services	Customer Services Manager	On-line payments (hosted by Capita)	PCIDSS compliant
External Services	Enforcement & Regulatory Services Manager	Disaster recovery	See Business Continuity Plan
External Services	Community Safety manager	CCTV - maintenance & administration	A key part of the Council's security setup

AUTOMATED DECISION MAKING

Strategic Directorate	Information Asset Owner	DPIA	Record/Information/ description	DPA requirements
External Services	Licensing Manager	Yes	Taxi/private hire drivers' English tests (Varsent)	The legitimate interests of the individual are safeguarded by allowing the individual to appeal the decision

ENFORCEMENT & REGULATORY SERVICES- INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

Strategic Asset Owner – Enforcement and Regulatory Services Manager

CONSENT, OUTSIDE EEA TRANSFERS, DATA PROCESSOR, MARKETING AND RISKS

Categories of data subject	Recipients of personal/sensitive data (as applicable)	If lawful basis for processing is CONSENT -is procedure in place for explicit consent and withdrawal of consent	Outside EEA Transfers if yes – have you checked contractual requirements?	Data Processor (i.e. processing undertaken by a third party under contract) & ISAs	Data Processor Contract Checked - to be varied to incorporate 2018 DPA requirements	Marketing	Profiling	Risk category (to be mapped in accordance with the Council's corporate/strategic risk impact table) Operational Risk Register updated YES/NO
Identifiable natural persons such as applicants, complainants, service users etc.	1.Council department(s) 2.Ombudsman 3.Courts 4.Cabinet Office- National Fraud Initiative 5.Police 6.HMRC 7.Trading Standards 8.Kent & Fire Rescue 9.NHS 10.Local authorities 11.Bailiffs	N/A	N/A	Pentana – Cloud based – retention only Secure Waste Disposal - no processing - Sharing of information under the Civil Contingencies Act 2004 & under the Kent & Medway Information Sharing Agreement (K&MISA) Dartford CCTV Code of Practice, including RIPA Protocol LA Support Ltd (Fixed Penalty Notices - littering& dog control Stanford & Green Ltd (Bailiffs) –parking contravention enforcement Newlyn PLC (Debt Recovery)) Park- Mobile UK Ltd (cashless parking)	Pentana - BS ISO/IEC 27001:2013 compliant Secure Waste Disposal – confidentiality clause in contract K&MISA- - compliant Dartford CCTV Code of Practice - compliant LA Support Ltd - compliant Stanford & Green Ltd (Bailiffs) – compliant Newlyn PLC - compliant Park-Mobile UK Ltd compliant	N/A	N/A	Enforcement, Parking Services, Licensing & Community Safety – Medium – risk score - 4 Town Centre Management – Low - risk score - 2

ENVIRONMENTAL HEALTH (SHARED SERVICE WITH SEVENOAKS DISTRICT COUNCIL) - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIA ¹	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal/archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held manually and/or on electronic systems (including mobile devices)	Children (under 13) – parental consent normally required
External Services	Environmental Health Manager	Procedure/guidance on a range of environmental health related matters	Applicable if policy or strategies have privacy implications	Supersedes previous version	Common Practice	Archive	No	N/A	No	N/A	Electronic – computer /laptop – intranet-website	N/A
External Services	Environmental Health Manager	Food Premises Inspections - reports, letters Inspection proforma, notices etc.	N/A	7 years	Statutory	Secure Disposal	Yes - (identifiable natural persons only) – name, address, contact details	Public interest task /legal obligation -- Food Safety Act 1990	No	N/A	Electronic	N/A
External Services	Environmental Health Manager	Approved food premises inspections – notes, reports etc. -	N/A	Until the business ceases trading	Statutory Set by Food Standards Agency	Secure Disposal	Yes - (identifiable natural persons only) – name, address, contact details	Public interest task/legal obligation- Food Safety Act 1990	No	N/A	Electronic and paper files	N/A
External Services	Environmental Health Manager	Service Requests – commercial, ancillary investigation enquiries	N/A	3 years	Statutory	Secure Disposal	Yes - (identifiable natural persons only) – name, address, contact details	Public interest task –in accordance with the legislation referred to in this IAR (as applicable)	No	N/A	Electronic	N/A
External Services	Environmental Health Manager	Notifications from Public Health England - food poisoning food borne infections, infectious diseases, notifiable diseases etc.	N/A	1 year	Set by Public Health England SLA	Secure Disposal	Yes - (identifiable natural persons only) – name, address, contact details	Public interest task /legal obligation- Public Health (Control of Disease) Act 1984 Health Protection (Notification) Regulations 2010 Food Safety Act 1990 Food Hygiene Regulations (2006) Food Safety and Hygiene (England) Regulations 2013	Yes- health data	Substantial public interest - Notification of Public Health (Control of Disease) Act 1984 Health Protection (Notification) Regulations 2010 Food Safety Act 1990 Food Hygiene Regulations (2006) Food Safety and Hygiene (England) Regulations 2013	Electronic	Yes – with parental consent

¹ When building new IT systems for storing or accessing personal data, developing legislation, policy or strategies that have privacy implications, embarking on a data sharing initiative; or using data for new purposes, evaluation or scoring, including profiling, automated decision-making, systematic monitoring of individuals, processing sensitive data, processing data on a large scale, matching or combining datasets, processing data concerning vulnerable data subjects, innovative use or application of technological or organisational solutions, data transfer across borders outside the EU, when the processing in itself “prevents data subjects from exercising a right or using a service or a contract

ENVIRONMENTAL HEALTH (SHARED SERVICE WITH SEVENOAKS DISTRICT COUNCIL) - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIA	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal/archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held manually and/or on electronic systems (including mobile devices)	Children (under 13) – parental consent normally required
External Services	Environmental Health Manager	Outbreak Notifications from Public Health England	N/A	8 years if no children involved 25 years if children involved	Set by Public Health England SLA	Secure Disposal	Yes - (identifiable natural persons only) – name, address, contact details	Public interest task /legal obligation- Public Health (Control of Disease) Act 1984 Health Protection (Notification) Regulations 2010	Yes- health data	Substantial public interest - Public Health (Control of Disease) Act 1984 Health Protection (Notification) Regulations 2010 -	Electronic	Yes – with parental consent
External Services	Environmental Health Manager	Food hygiene training – qualification- food business employees	N/A	7 years	Common Practice	Secure Disposal	Yes - (identifiable natural persons only) – name, address, contact details	Public interest task/legal obligation – Food Safety Act 1990	No	N/A	Electronic	N/A
External Services	Environmental Health Manager	RIDDOR – reporting of accidents & incidences in the work place & injuries, diseases and dangerous occurrences	N/A	10 years for adults Under 18 – until the person is 18 or 10 years (whichever is longer) Persons in care – for their lifetime	Statutory	Secure Disposal	Yes - (identifiable natural persons only) – name, address, contact details	Public interest task/legal obligation - Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013	Yes – health data	Substantial public interest/legal obligation- Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013	Electronic	N/A
External Services	Environmental Health Manager	LOLERS (Lifting Operations & Lifting Equipment Regulations 1998 - (defect notifications)	N/A	7years	Statutory	Secure Disposal	No	N/A	No	N/A	Electronic	N/A
External Services	Environmental Health Manager	Cooling Towers' Register	N/A	For the life of the installation	Statutory	Secure Disposal	Yes - (identifiable natural persons only) – name, address, contact details	Public interest task/legal obligation - Notification of Cooling Towers and Evaporative Condensers Regulations 1992	No	N/A	Electronic- public record on request	N/A

ENVIRONMENTAL HEALTH (SHARED SERVICE WITH SEVENOAKS DISTRICT COUNCIL) - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIA	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal/archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held manually and/or on electronic systems (including mobile devices)	Children (under 13) – parental consent normally required
External Services	Environmental Health Manager	Childminders - list of all childminders registered by KCC to operate in the area – food hygiene inspections reports, letters inspection proforma, notices etc.	N/A	7 years	Statutory	Secure Disposal	Yes - - (identifiable natural persons only) – name, address, contact details	Public interest task – Food Safety Act 1990	No	N/A	Electronic	N/A
External Services	Environmental Health Manager	Health & Safety at Work -inspections reports, letters inspection proforma, notices etc.	N/A	7 years	Statutory	Secure Disposal	Yes - (identifiable natural persons only) – name, address, contact details	Public interest task- Health and Safety at Work etc. Act 1974	No	N/A	Electronic	N/a
External Services	Environmental Health Manager	Skin piercing activities - registration applications (premises and persons), inspections' reports, letters, inspection proforma, notices etc.	N/A	For the period that the premises and/or practitioner remains registered	Statutory	Disposal	Yes - (identifiable natural persons only) – name, address, contact details	Public interest task - Local Government (Miscellaneous Provisions) Act 1982	No	N/A	Electronic and paper files	N/A
External Services	Environmental Health Manager	Contaminated Land Register - <ul style="list-style-type: none"> • Site Surveys • Sample results • Consultant advice • Records of works • Records of legal actions • Correspondence 	N/A.	Permanent	Common Practice	Archive	Yes - (identifiable natural persons only) – name, address, contact details	Public interest task - Section 78(R) of Part IIA of the Environmental Protection Act 1990	No	N/A	Electronic systems (GIS) and Paper files – public register on request	N/A
External Services	Environmental Health Manager	Animal Licences - <ul style="list-style-type: none"> • Boarding Kennels • Catteries • Dangerous Wild Animals • Riding Establishments • Zoo 	N/A	Superseded by current version	Common Practice	Secure Disposal	Yes - (identifiable natural persons only) – name, address, contact details	Public interest task - Animal Boarding Establishments Act 1963 Dangerous Wild Animals Act 1976 Riding Establishments Acts 1964 – 1970 Zoo Licensing Act 1981	No	N/A	Electronic (uniform/s:\)	N/A

ENVIRONMENTAL HEALTH (SHARED SERVICE WITH SEVENOAKS DISTRICT COUNCIL) - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIA	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal/archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held manually and/or on electronic systems (including mobile devices)	Children (under 13) - parental consent normally required
External Services	Environmental Health Manager	Stray Dog Register - data collected by SDC/DBC (electronic register) Paperwork Stray dog log kept by Davenden Kennels	N/A	5 years 3 years 1 month	Statutory	Secure Disposal	Yes -(identifiable natural persons only) – name, address, contact details	Public interest task/legal obligation - Environmental Protection (Stray Dogs) Regulations 1992	No	N/A	Electronic (excel) Paper records – public register on request	N/A
External Services	Environmental Health Manager	Primary Authority - contracts with businesses, SLA between local authorities	N/A	7 years	Common Practice	Secure Disposal	Yes -(identifiable natural persons only) – name, address, contact details	Public interest task/legal obligation – Regulatory Enforcement and Sanctions Act 2008 Primary Authority Statutory Guidance	No	N/A	Electronic	N/A
External Services	Environmental Health Manager	Legal Notices – abatement notices etc.	N/A	Whilst relevant - then 7 years	Common Practice	Secure Disposal	Yes -(identifiable natural persons only) – name, address, contact details	Public interest task/legal obligation -in accordance with the legislation referred to in this IAR (as applicable)	No	N/A	Electronic (uniform, s:\) and paper file	N/A
External Services	Environmental Health Manager	Customer Surveys	N/A	1 year	Common Practice	Secure Disposal	Yes -(identifiable natural persons only) – name, address, contact details	Public interest task - in accordance with the legislation referred to in this IAR (as applicable)	No	N/A	Paper record	N/A
External Services	Environmental Health Manager	Audio Recordings – noise, disclosure forms etc.	N/A	Whilst relevant to ongoing enforcement action then 3 years	Common Practice	Secure Disposal	Yes -(identifiable natural persons only) – name, address, contact details	Public interest task/legal obligation – Environmental Protection Act 1990 Noise and Statutory Nuisance Act 1993 Noise Act 1996	No	N/A	Electronic system (s:\)	N/A
External Services	Environmental Health Manager	Local Government & Social Care Ombudsman – case file material - complaints received and outcomes	N/A	1 year from date of case closure unless exceptional circumstances require longer retention e.g. pending court case	Common Practice	Secure Disposal	Yes - (identifiable natural persons only) - name , address, contact details	Public interest task/legal obligation – Local Government Act 1974	Yes- health data, offences (including alleged offences) etc.	Substantial public interest – Section 26(5) Local Government Act 1974	Paper copy &/or electronic - Idox	N/A

ENVIRONMENTAL HEALTH (SHARED SERVICE WITH SEVENOAKS DISTRICT COUNCIL) - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIA	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal/archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held manually and/or on electronic systems (including mobile devices)	Children (under 13) - parental consent normally required
External Services	Environmental Health Manager	Photographic Evidence of condition of premises – case file – correspondence etc.	N/A	Whilst relevant to ongoing enforcement action then 3 years. Unless photograph to be used for future educational purposes (no identifiable data)	Common Practice	Secure Disposal	Yes- if linked with other data relating to an identifiable natural person	Public interest task – in accordance with the legislation referred to in this IAR (as applicable)	No	N/A	Electronic systems (s:1)	N/A
External Services	Environmental Health Manager	Alarm Database – database of key-holders for use when following up complaints of alarms sounding	N/A	3 years or until customer opts out of service	Common Practice	Secure Disposal	Yes - (identifiable natural persons only) – name, address, contact details	Public interest task/legal obligation – Environmental Protection Act 1990 Noise and Statutory Nuisance Act 1993 Noise Act 1996	No	N/A	Electronic (laptop) Uniform	N/A
External Services	Environmental Health Manager	CSU Daily Tasking – notes of meeting MARAC – Multi agency risk assessment conference	N/A	Reviewed and then destroyed	Common Practice	Secure Disposal	Yes - (identifiable natural persons only) – name, address, contact details	Public interest task/legal obligation - Anti-Social Behaviour Act 2003 Anti-Social Behaviour Crime and Policing Act 2014	Yes- alleged offences, criminal proceedings outcomes and sentences (as applicable)	Substantial public Interest - Anti-Social Behaviour Act 2003 Anti-Social Behaviour Crime and Policing Act 2014	Electronic (email)	N/A
External Services	Environmental Health Manager	Events' Notifications- management of crowd safely at events such as festivals and concerts	N/A	1 year from date of event	Common Practice	Disposal	Yes - (identifiable natural persons only) – name, address, contact details	Public interest task – Health & Safety Executive Guidance on running events safely Code of Practice on Environmental Noise Control at Concerts 1995 and legislation applying to permits, licences etc.	No	N/A	Electronic	N/A

ENVIRONMENTAL HEALTH (SHARED SERVICE WITH SEVENOAKS DISTRICT COUNCIL) - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIA	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal/archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held manually and/or on electronic systems (including mobile devices)	Children (under 13) - parental consent normally required
External Services	Environmental Health Manager	General correspondence – emails, memos, letters etc. not associated with service requests	N/A	1 year unless considered important for future reference	Common Practice	Disposal	Yes - (identifiable natural persons only) – name, address, contact details	Public interest task – in accordance with the legislation referred to in this IAR (as applicable)	No	N/A		N/A
External Services	Environmental Health Manager	Food Registration – business premises	N/A	Superseded by current version	Common Practice	Secure Disposal	Yes - (identifiable natural persons only) – name, address, contact details	Public interest task/legal obligation – Food Safety Act 1990	No	N/A	Paper files – migrating to electronic - public register on request	N/A
External Services	Environmental Health Manager	Performance Indicators	N/A	1 year from date of entry on Pentana	Common Practice	Disposal	No	N/A	No	N/A	Electronic - on Pentana	N/A
External Services	Environmental Health Manager	Note Books – site visit inspections	N/A	5 years from date of last inspection noted in the book.	Common Practice	Secure Disposal	Yes - (identifiable natural persons only) – name, address, contact details	Public interest task - in accordance with the legislation referred to in this IAR (as applicable)	Yes – alleged offences	Substantial public Interest/Legal claims- in accordance with the legislation referred to in this IAR (as applicable)	Paper Copy	N/A

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIA	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal/archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held manually and/or on electronic systems (including mobile devices)	Children (under 18) -
External Services	Environmental Health Manager	Safeguarding Referrals (children & adults at risk)	Yes	Delete immediately following receipt by KCC	Common Practice	Secure Disposal	Yes – (identifiable natural persons only) - name , address, contact details	Public interest task/legal obligation – Children Act 2004/Care Act 2014 Statutory Guidance - Working Together to Safeguard Children Care & Support Statutory Guidance	Yes – health data, offences (including alleged offences)	Substantial public interest task/legal obligation – Children Act 2004/Care Act 2014 - Working Together to Safeguard Children Care & Support Statutory Guidance	Paper copy &/or electronic	Yes

ENVIRONMENTAL HEALTH (SHARED SERVICE WITH SEVENOAKS DISTRICT COUNCIL) - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

TECHNICAL & ORGANISATIONAL SECURITY MEASURES

Strategic Directorate	Information Asset Owner	IT Systems	Security Measures
Internal Services	I.C.T. Manager	Idox/UNIFORM/Academy and department computers and laptops/internet /intranet – maintenance and administration	Password administration, data encryption, implementation of PSN based email services, IT services contingency planning, firewall barriers to hackers, virus protection software, full back-up, rescue disks, security audits, regular testing, assessing and evaluating the effectiveness of technical and organisational measures for ensuring the security of the processing, corporate guidance on organisational/security measure, DPIAs
Internal Services	Policy & Corporate Support Manager	Pentana – maintenance & administration	BS ISO/IEC 27001:2013 compliant
Internal Services	Customer Services Manager	On-line payments (hosted by Capita)	PCIDSS compliant
Internal Services	I.C.T. Manager	Stay Connected email alerts (DBC website)	Subscriber own password – unsubscribe at any time
External Services	Environmental Health Manager	Idox/UNIFORM Academy/Pentana and computers and laptops/internet /intranet - – input of data – the environmental health function	Use of passwords
External services	Environmental Health Manager	Kings ERG	Public access through secure website – password protected – Kings ERG controlled
External Services	Environmental Health Manager	Disaster recovery	See Business Continuity Plan
External Services	Enforcement & Regulatory Services Manager	CCTV – maintenance and administration	A key part of the Council's security setup

ENVIRONMENTAL HEALTH (SHARED SERVICE WITH SEVENOAKS DISTRICT COUNCIL) - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

CONSENT, OUTSIDE EEA TRANSFERS, DATA PROCESSOR, MARKETING AND RISKS See Supplementary table attached below

Categories of data subject	Recipients of personal/sensitive data (as applicable)	If lawful basis for processing is CONSENT -is procedure in place for explicit consent and withdrawal of consent	Outside EEA Transfers YES/NO –if yes – have you checked contractual requirements?	Data Processor (i.e. processing undertaken by a third party under contract) & ISAs	Data Processor Contract Checked - to be varied to incorporate 2018 DPA requirements	Marketing	Profiling	Risk category (to be mapped in accordance with the Council's corporate/strategic risk impact table) Operational Risk Register updated YES/NO
Identifiable natural persons such as leaseholders, tenants, complainants, applicants, service users etc.	1.Council department(s) 2.Ombudsman 3.Kings College London 4 Public Health England 5.Contractors 6.HMRC 7.Food Standards Agency 8.Drinking Water Inspectorate 9.Health & Safety Executive 10.Local Authorities 11.Environment Agency 12.Water Utilities 13.Courts/tribunals	N/A	N/A	Pentana – Cloud based – retention only	Pentana - BS ISO/IEC 27001:2013 compliant – not managed by EH	N/A	N/A	Yes (corporate)
				Secure Waste Disposal - no processing –	Secure Waste Disposal – confidentiality clause in contract –not managed by EH	N/A	N/A	Yes (corporate)
				SDC/DBC Partnership Agreement	Partnership Agreement to be reviewed by legal	N/A	N/A	Yes(corporate)
				Kent & Medway Information Sharing Agreement	KMISA -compliant	N/A	N/A	Yes(corporate)
				Monitor Pest Control - pest inspection, exterminator, animal control	Monitor Pest Control - compliant	N/A	N/A	Yes -10
				Davenden Kennelling Contract	Davenden Kennelling – Compliant	N/A	N/A	Yes- 10
				Food Safety Inspections' Contracts	FSA –no contract required	N/A	N/A	Yes- 5
Noise App Contract	Noise App contract - compliant	N/A	N/A	Yes- 5				

FINANCIAL SERVICES - INFORMATION ASSET REGISTER 2018

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIAs ¹	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. Secure Disposal/archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held manually and/or on electronic systems (including mobile devices)	Children (under 13) – parental consent normally required
Budget												
Internal Services	Financial Services Manager	Records relating to the cashing process including bank statements, receipts, remittance advice	N/A	Current year plus 6 years	HMRC - Compliance Handbook Manual CH15400	Secure Disposal	No	N/A	No	N/A	Electronic	No
Internal Services	Financial Services Manager	The process of managing the banking transactions of the authority	N/A	Case concluded + 6 years	HMRC - Compliance Handbook Manual CH15400	Secure Disposal	Yes - (identifiable natural persons only) - name, address, contact details	Legal obligation- Section 151 Local Government Act 1972	No	N/A	Electronic	No
Internal Services	Financial Services Manager	Annual Budget Plan	N/A	3 years	Common Practice	Secure Disposal	No	N/A	No	N/A	Electronic	No
Internal Services	Financial Services Manager	Budget Preparation	N/A	3 years	Common Practice	Secure Disposal	No	N/A	No	N/A	Electronic	No
Internal Services	Financial Services Manager	Budget Planning documents	N/A	4 years	Common Practice	Secure Disposal	No	N/A	No	N/A	Electronic	No
Internal Services	Financial Services Manager	Budget Planning Potential restructures	N/A	4 years	Common Practice	Secure Disposal	Yes identifiable natural persons only) - name, address, contact details	Legal obligation- Section 151 Local Government Act 1972	No	N/A	Electronic	No

¹ When building new IT systems for storing or accessing personal data, developing legislation, policy or strategies that have privacy implications, embarking on a data sharing initiative; or using data for new purposes, evaluation or scoring, including profiling, automated decision-making, systematic monitoring of individuals, processing sensitive data, processing data on a large scale, matching or combining datasets, processing data concerning vulnerable data subjects, innovative use or application of technological or organisational solutions, data transfer across borders outside the EU, when the processing in itself "prevents data subjects from exercising a right or using a service or a contract

FINANCIAL SERVICES - INFORMATION ASSET REGISTER 2018

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIAs	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. Secure Disposal/archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held manually and/or on electronic systems (including mobile devices)	Children (under 13) – parental consent normally required
Capital												
Internal Services	Financial Services Manager	Staffing Emoluments Monitoring Schedules	N/A	Current year plus 6 years	Common Practice	Secure Disposal	Yes - (identifiable natural persons only) - name, address, contact details, post, financial info etc.	Necessary for the performance of a contract	No	N/A	Electronic	No
Internal Services	Financial Services Manager	Revenue Budget Files	N/A	4-Current year plus 6 years	Common Practice	Secure Disposal	No	N/A	No	N/A	Electronic	No
Internal Services	Financial Services Manager	Asset Management - annual beacon & PPP valuation records	N/A	Current year plus 10 years	Common Practice	Secure Disposal	No	N/A	No	N/A	Electronic	No
Internal Services	Financial Services Manager	Finance and Procurement: Financial Management: Capital Finance: Asset Registers (including Property Register, Vehicles, Plant and Equipment Register, Infrastructure Asset Register and Community Asset Register)	N/A	Current year plus 10 years	Common Practice	Secure Disposal	No	N/A	No	N/A	Electronic	No
Internal Services	Financial Services Manager	Lease Property Register (for financial accounts)	N/A	Current year plus 6 years	Common Practice	Secure Disposal	No	N/A	No	N/A	Electronic	No
Internal Services	Financial Services Manager	Financial Management: Capital Finance: records relating to developer contributions	N/A	Life of the agreement + 12 years	Limitation Act 1980 (Section 8)	Secure Disposal	No	N/A	No	N/A	Electronic	No
Internal Services	Financial Services Manager	Records relating to rent collected by DBC for properties, wayleaves, easements etc.	N/A	Expiry of lease + 6 years	Common Practice	Secure Disposal	No	N/A	No	N/A	Electronic	No
Internal Services	Financial Services Manager	Records relating to the financing and monitoring of the Capital Programme		Current year plus 1 year	Common Practice	Secure Disposal	No	N/A	No	N/A	Electronic	No

FINANCIAL SERVICES - INFORMATION ASSET REGISTER 2018

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIAs	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. Secure Disposal/archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held manually and/or on electronic systems (including mobile devices)	Children (under 13) – parental consent normally required
Final Accounts												
Internal Services	Financial Services Manager	Creation of annual accounts - operational copies	N/A	Current year plus 6 years	Common Practice	Secure Disposal	No	N/A	No	N/A	Electronic	No
Internal Services	Financial Services Manager	Creation of annual accounts - principal copy	N/A	15 years	Common Practice	Secure Disposal	Yes - (identifiable natural persons only) - name, address, contact details, post, financial info etc.	Legal obligation compliance - Section 151 Local Government Act 1972	No	N/A	Electronic	No
Internal Services	Financial Services Manager	Background records relating to the creation of the annual accounts	N/A	Current year plus 6 years	HMRC - Compliance Handbook Manual CH15400	Secure Disposal	Yes - (identifiable natural persons only) - name, address, contact details, post, financial info etc.	Legal obligation compliance – Section 151 Local Government Act 1972	No	N/A	Electronic	No
Internal Services	Financial Services Manager	All records relating to the closedown of the annual accounts	N/A	Current year plus 6 years	HMRC - Compliance Handbook Manual CH15400	Secure Disposal	No	N/A	No	N/A	Electronic	No
Internal Services	Financial Services Manager	Capital Finance: Statement of Accounts Working Papers	N/A	Current year plus 6 years	HMRC - Compliance Handbook Manual CH15400	Secure Disposal	No	N/A	No	N/A	Electronic	No
Internal Services	Financial Services Manager	Annual Governance Statements	N/A	Kept by Democratic Services in Audit Board papers for posterity	Common Practice	Secure Disposal	Yes - (identifiable natural persons only) – name)	N/A	No	N/A	Electronic	No
Internal Services	Financial Services Manager	Financial Strategy: Statistical Returns to Central Government and CIPFA, Statutory Returns to Central Government	N/A	Current year + 6 years	Common Practice	Secure Disposal	No	N/A	No	N/A	Electronic	No

FINANCIAL SERVICES - INFORMATION ASSET REGISTER 2018

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIAs	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. Secure Disposal/archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held manually and/or on electronic systems (including mobile devices)	Children (under 13) – parental consent normally required
Financial Planning												
Internal Services	Financial Services Manager	MTFP		Current year plus 6 years	Common Practice	Secure Disposal	No	N/A	No	N/A	Electronic	No
Internal Services	Financial Services Manager	Working papers relating to forward financial planning	N/A	Where strategies are not accepted then the records are disposed of; where the strategies are accepted current financial year + 6 years	Common Practice	Secure Disposal	No	N/A	No	N/A	Electronic	No
Financial Records												
Internal Services	Financial Services Manager	Collection and deposit books	N/A	Current year plus 6 years	HMRC - Compliance Handbook Manual CH15400	Secure Disposal	No	N/A	No	N/A	Manually	No
Internal Services	Financial Services Manager	Delivery notes, confirmations of orders	N/A	Current year + 1 year	Common Practice	Secure Disposal	No	N/A	No	N/A	Manual/Electronic	No
Internal Services	Financial Services Manager	Capital Invoices - Original capital invoices sent for payment	N/A	Current year plus 6 years	Common Practice	Secure Disposal	No	N/A	No	N/A	Manual/Electronic	No
Internal Services	Financial Services Manager	All records relating to the management of the purchase cards	N/A	Current year plus 6 years	Common Practice	Secure Disposal	No	N/A	No	N/A	Manual/Electronic	No
Internal Services	Financial Services Manager	All records relating to petty cash reconciliations	N/A	Current year plus 6 years	Common Practice	Secure Disposal	No	N/A	No	N/A	Electronic	No

FINANCIAL SERVICES - INFORMATION ASSET REGISTER 2018

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIAs	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal/archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held manually and/or on electronic systems (including mobile devices)	Children (under 13) – parental consent normally required
Financial Records												
Internal Services	Financial Services Manager	Accounts Receivable Customer Amendments	N/A	6 Years after the date of settlement	Common Practice	Secure Disposal	Yes - (identifiable natural persons only) - name, address, contact details, post, financial info etc.	Legal obligation compliance - Section 151 Local Government Act 1972	No	N/A	Manual/Electronic	No
Internal Services	Financial Services Manager	Records relating to the authorisation of purchase card users	N/A	Current year plus 6 years	Common Practice	Secure Disposal	Yes - (identifiable natural persons only) - name, address, contact details, post, financial info etc.	Legal obligation compliance – section 151 Local Government Act 1972	No	N/A	Manual/Electronic	No
Internal Services	Financial Services Manager	Payments: all records relating to signatory forms	N/A	Current year plus 6 years	Common Practice	Secure Disposal	Yes - (identifiable natural persons only) - name, address, contact details, post, financial info etc.	Legal obligation compliance – Section 151 Local Government Act 1972	No	N/A	Electronic	No
Internal Services	Financial Services Manager	Community Grants	N/A	Current year plus 6 years	Common Practice	Secure Disposal	Yes - (identifiable natural persons only) - name, address, contact details, post, financial info etc.	Legal obligation compliance – Section 151 Local Government Act 1972	No	N/A	Electronic	No
Internal Services	Financial Services Manager	Records relating to internal recharging	N/A	Current year plus 4 years	Common Practice	Secure Disposal	No	N/A	No	N/A	Electronic	No

FINANCIAL SERVICES - INFORMATION ASSET REGISTER 2018

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIAs	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal/archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held manually and/or on electronic systems (including mobile devices)	Children (under 13) – parental consent normally required
Financial Records												
Internal Services	Financial Services Manager	Bank paying in books/slips	N/A	Current year plus 6 years	HMRC - Compliance Handbook Manual CH15400	Secure Disposal	No	N/A	No	N/A	Manual/Electronic	No
Internal Services	Financial Services Manager	Collection and Deposit Books	N/A	Current year plus 12 years	HMRC - Compliance Handbook Manual CH15400	Secure Disposal	No	N/A	No	N/A	Manual/Electronic	No
Internal Services	Financial Services Manager	Payment card terminal receipts	N/A	Current year plus 6 years	HMRC - Compliance Handbook Manual CH15400	Secure Disposal	No	N/A	No	N/A	Manual/Electronic	No
Internal Services	Financial Services Manager	Accounts payable	N/A	Current year plus 6 years	HMRC - Compliance Handbook Manual CH15400	Secure Disposal	Yes - (identifiable natural persons only) - name, address, contact details, post, financial	Legal obligation compliance – Section 151 Local Government Act 1972	No	N/A	Manual/Electronic	No
Internal Services	Financial Services Manager	VAT and Tax Returns	N/A	Current year plus 6 years	HMRC - Compliance Handbook Manual CH15400	Secure Disposal	No	N/A	No	N/A	Manual/Electronic	No
Internal Services	Financial Services Manager	VAT documents, HMRC	N/A	Current year plus 6 years	HMRC - Compliance Handbook Manual CH15400	Secure Disposal	No	N/A	No	N/A	Manual/Electronic	No
Internal Services	Financial Services Manager	All records relating to the management of companies, VAT and taxation and the completion of the final accounts	N/A	Current year plus 6 years	HMRC - Compliance Handbook Manual CH15400	Secure Disposal	No	N/A	No	N/A	Electronic	No
Internal Services	Financial Services Manager	Records relating to financial arrangements with partners	N/A	Where a formal agreement has been reached then life of the agreement	Common Practice	Secure Disposal	No	N/A	No	N/A	Manual/Electronic	No
Internal Services	Financial Services Manager	Purchase orders and other records relating to the purchase of equipment	N/A	Current year plus 6 years	HMRC - Compliance Handbook Manual CH15400	Secure Disposal	No	N/A	No	N/A	Manual/Electronic	No

FINANCIAL SERVICES - INFORMATION ASSET REGISTER 2018

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIAs	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal/archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held manually and/or on electronic systems (including mobile devices)	Children (under 13) – parental consent normally required
Financial Records												
Internal Services	Financial Services Manager	Records of Grant bids for successful projects	N/A	As per grant requirements or 7 years	Common (required by T&C's of grants)	Secure Disposal	No	N/A	No	N/A	Manual/Electronic	No
Internal Services	Financial Services Manager	VAT documents opt to tax and communications with HMRC	N/A	Until superseded and then a relevant period afterwards (+ 6 years)	HMRC - Compliance Handbook Manual CH15400	Secure Disposal	No	N/A	No	N/A	Manual/Electronic	No
Financial Strategy												
Internal Services	Financial Services Manager	All records relating to responses made to central government initiatives	N/A	Date of government decision + 5 years	Common Practice	Secure Disposal	No	N/A	No	N/A	Electronic	No
Governance												
Internal Services	Financial Services Manager	Creation and development of the financial regulations	N/A	Until superseded, then one copy of each superseded policy/procedure to be retained for a minimum of 6 years	Common Practice	Secure Disposal	No	N/A	No	N/A	Electronic	No
Internal Services	Financial Services Manager	External Audit inspection reports	N/A	Closure + 5 years	Common Practice	Secure Disposal	No	N/A	No	N/A	Electronic	No
Internal Services	Financial Services Manager	External Audit Letters	N/A	Closure + 5 years	Common Practice	Secure Disposal	No	N/A	No	N/A	Electronic	No
Grants												
Internal Services	Financial Services Manager	Financial records relating to projects which have been funded by external funding bodies (including European Funding)	N/A	Last payment + the length of time required by the funding body	As per funding body requirements	Secure Disposal	No	N/A	No	N/A	Manual/Electronic	No
Internal Services	Financial Services Manager	Records of grant bids for successful projects	N/A	As per grant requirements (7 years)	Common Practice (required by T&C's of grants)	Secure Disposal	Yes - identifiable natural persons only) - name, address, contact details	Legal obligation compliance – Section 151 Local Government Act 1972	No	N/A	Electronic	No

FINANCIAL SERVICES - INFORMATION ASSET REGISTER 2018

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIAs	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal/archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held manually and/or on electronic systems (including mobile devices)	Children (under 13) – parental consent normally required
Insurance												
Internal Services	Financial Services Manager	Claims made against DBC insurance policies – damage to property	N/A	Case concluded + 6 years	Limitation Act 1980 (Section 2)	Secure Disposal	Yes- identifiable natural persons only) - name, address, contact details	Legal claims	No	N/A	Electronic	No
Internal Services	Financial Services Manager	Claims management database - short term claims	N/A	Case concluded + 6 years then review	Limitation Act 1980 (Section 2)	Secure Disposal	Yes - identifiable natural persons only) - name, address, contact details	Legal claims	Yes- health data	Legal claims	Electronic	No
Internal Services	Financial Services Manager	Claims history (limited details) (long term claims) - claim type, amounts etc. for understanding risk	N/A	Up to 25 years	Common Practice	Secure Disposal	No	N/A	No	N/A	Electronic	No
Internal Services	Financial Services Manager	Insurance policies relating to insurance purchased by DBC to cover its activities	N/A	Date of expiry of policy + 6 years	Employers Liability/ Financial Regulations	Secure Disposal	No	N/A	No	N/A	Electronic	No
Internal Services	Financial Services Manager	Employer's Liability and Public Liability Insurance Policies	N/A	Date of expiry of policy + 40 year	Employers Liability (Compulsory Insurance) Regulations 1998 (5/1-2)	Secure Disposal	No	N/A	No	N/A	Electronic	No
Internal Services	Financial Services Manager	Information relating to liability insurance claims for minors under policies held by the Council	N/A	22 years from date of birth	Limitation Act 1980	Secure Disposal	Yes - identifiable natural persons only) - name, address, contact details	Legal claims	Yes – health data	Legal claims	Electronic	Yes – provided to the Council as part of the claim

FINANCIAL SERVICES - INFORMATION ASSET REGISTER 2018

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIAs	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. Secure Disposal/archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held manually and/or on electronic systems (including mobile devices)	Children (under 13) – parental consent normally required
Insurance												
Internal Services	Financial Services Manager	Information relating to an industrial disease insurance claim	N/A	100 years from date of birth or 6 years from date of settlement/repudiation	Limitation Act 1980	Secure Disposal	Yes - identifiable natural persons only) - name, address, contact details	Legal claims	Yes – health data	Legal claims	Electronic	No
Internal Services	Financial Services Manager	Files relating to the management of insurable risks across DBC	N/A	Current year + 3 years then review	Common Practice	Secure Disposal	No	N/A	No	N/A	Electronic	No
Monitoring												
Internal Services	Financial Services Manager	Monthly Monitoring reports submitted to Cabinet -	N/A	Kept by Democratic Services as part of Cabinet papers	Statutory	Secure Disposal	No	N/A	No	N/A	Manual/Electronic	No
Internal Services	Financial Services Manager	Financial records - main copy	N/A	Current year plus 6 years	HMRC - Compliance Handbook Manual CH15400	Secure Disposal	Yes - identifiable natural persons only) - name, address, contact details	Public interest (subsidiary activity)	No	N/A	Manual/Electronic	No
Internal Services	Financial Services Manager	Budget Monitoring Reports	N/A	Current year plus 6 years	Common Practice	Secure Disposal	No	N/A	No	N/A	Manual/Electronic	No
Internal Services	Financial Services Manager	Budget Monitoring Recharge basis data	N/A	Current year plus 6 years	Common Practice	Secure Disposal	No	N/A	No	N/A	Manual/Electronic	No
Internal Services	Financial Services Manager	Budget Monitoring Specific system downloads	N/A	Current year plus 6 years	Common Practice	Secure Disposal	Yes - identifiable natural persons only) - name, address, contact details	Public interest (subsidiary activity)	No	N/A	Manual/Electronic	No
Payroll												
Internal Services	Financial Services Manager	Officer Expenses	N/A	Current year plus 6 years	Common Practice	Secure Disposal	Yes - identifiable natural persons only) - name, address, contact details, financial info etc.	Necessary for the performance of a contract with the data subject	No	N/A	Manual/Electronic	No
Internal Services	Financial Services Manager	Payroll: Leavers' Reports	N/A	Current year plus 6 years	Common Practice	Secure Disposal	No	N/A	No	N/A	Manual/Electronic	No

FINANCIAL SERVICES - INFORMATION ASSET REGISTER 2018

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIAs	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. Secure Disposal/archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held manually and/or on electronic systems (including mobile devices)	Children (under 13) – parental consent normally required
Payroll												
Internal Services	Financial Services Manager	Forms and information to enable payroll changes to be explained e.g. starters, leavers, pension opt out forms, progressions, change of circumstances, restructures, special payments etc.	N/A	13 years (as required by KCC pensions) + current	Statutory – Obligation to provide information to the pension fund under regulation 80 of the Local Government Pension Scheme Regulations 2013	Secure Disposal	Yes - identifiable natural persons only) - name, address, contact details, financial info, national insurance number, bank account details	Necessary for the performance of a contract with the data subject	No	N/A	Electronic	No
Internal Services	Financial Services Manager	Year-end pension returns	N/A	13 years (as required by KCC pensions) + current	Statutory – Obligation to provide information to the pension fund under regulation 80 of the Local Government Pension Scheme Regulations 2013	Secure Disposal	Yes – identifiable natural persons only) – name, address, contact details, financial data national insurance number)	Necessary for the performance of a contract with the data subject	No	N/A	Electronic	No
Internal Services	Financial Services Manager	Monthly payroll reports showing breakdown of gross pay, national insurance, tax, pension contributions and other payroll related deductions or payments	N/A	13 years (as required by KCC pensions) + current	Statutory – Obligation to provide information to the pension fund under regulation 80 of the Local Government Pension Scheme Regulations 2013	Secure Disposal	Yes- identifiable natural persons only) - name, address, contact details, financial data	Necessary for the performance of a contract with the data subject	No	N/A	Electronic	No
Internal Services	Financial Services Manager	Salary monitoring records	N/A	6 years plus current	Common Practice	Secure Disposal	Yes- identifiable natural persons only) - name, financial data	Necessary for the performance of a contract with the data subject	No	N/A	Electronic	No

FINANCIAL SERVICES - INFORMATION ASSET REGISTER 2018

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIAs	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. Secure Disposal/archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held manually and/or on electronic systems (including mobile devices)	Children (under 13) – parental consent normally required
Internal Services	Financial Services Manager	Costing reports	N/A	6 years plus current	Common Practice	Secure Disposal	Yes-identifiable natural persons only) - name, financial data	Necessary for the performance of a contract with the data subject	No	N/A	Electronic	No
Internal Services	Financial Services Manager	Bank detail change requests	N/A	6 years plus current	Common Practice	Secure Disposal	Yes-identifiable natural persons only) - name, financial data	Necessary for the performance of a contract with the data subject	No	N/A	Electronic	No
Internal Services	Financial Services Manager	Pension leaver forms and data	N/A	13 years (as required by KCC pensions) + current	Statutory – Obligation to provide information to the pension fund under regulation 80 of the Local Government Pension Scheme Regulations 2013	Secure Disposal	Yes-identifiable natural persons only) - name, address, contact details, financial data	Necessary for the performance of a contract with the data subject	No	N/A	Electronic	No
Internal Services	Financial Services Manager	All records relating to the management of car loans	N/A	Current year plus 6 years once settled	Common Practice	Secure Disposal	Yes-identifiable natural persons only) - name, address, contact details, financial data	Necessary for the performance of a contract with the data subject	No	N/A	Electronic	No
Internal Services	Financial Services Manager	P11D information and completed forms	N/A	Current year plus 6 years	Common Practice	Secure Disposal	Yes-identifiable natural persons only) - name, address, contact details, financial data	Necessary for the performance of a contract with the data subject	No	N/A	Electronic	No

FINANCIAL SERVICES - INFORMATION ASSET REGISTER 2018

Procurement												
Internal Services	Financial Services Manager	Financial vetting of companies	N/A	Life of contract	Common Practice	Secure Disposal	No	N/A	No	N/A	Electronic	No
Internal Services	Financial Services Manager	Procurement case file – tenders, correspondence etc. (excluding contract)	N/A	3 years (unless required for future reference)	Common Practice	Secure Disposal	No	N/A	No	N/A	Electronic	No
Internal Services	Financial Services Manager	Contracts under seal	N/A	Last action on the contract + 12 years	Limitation Act 1980 (Section 8)	Secure Disposal	Yes-identifiable natural persons only) - name, address, contact details	N/A	No	N/A	Electronic	No
Internal Services	Financial Services Manager	Financial vetting of companies	N/A	End of contract plus 6 years or end of contract plus 12 years for contracts under seal	Common Practice	Secure Disposal	Yes-identifiable natural persons only) - name, address, contact details	Legal obligation – Section 151 Local Government Act 1972	No	N/A	Electronic	No
Internal Services	Financial Services Manager	All documentation related to a tender including PQQ, invitation to tender, letters, evaluation matrices etc.	N/A	End of contract plus 6 years or end of contract plus 12 years for contracts under seal	Common Practice	Secure Disposal	Yes-identifiable natural persons only) - name, address, contact details	Legal obligation – Section 151 Local Government Act 1972	No	N/A	Electronic	No
Internal Services	Financial Services Manager	Contract files under seal	N/A	Last action on the contract + 12 years	Limitation Act 1980 (Section 8)	Secure Disposal	No	N/A	No	N/A	Electronic	No
Internal Services	Financial Services Manager	Contract files under signature	N/A	Life of the agreement + 12 years	Limitation Act 1980 (Section 8)	Secure Disposal	No	N/A	No	N/A	Electronic	No

FINANCIAL SERVICES - INFORMATION ASSET REGISTER 2018

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIAs ²	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. Secure Disposal/archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held manually and/or on electronic systems (including mobile devices)	Children (under 13) – parental consent normally required
Procurement												
Internal Services	Financial Services Manager	All documentation related to a tender including PQQ, invitation to tender, letters, evaluation matrices etc.	N/A	End of contract plus 6 years or end of contract plus 12 years for contracts under seal	Common Practice	Secure Disposal	Yes- identifiable natural persons only) - name, address, contact details	Legal obligation – Section 151 Local Government Act 1972	No	N/A	Electronic	No
Internal Services	Financial Services Manager	Contract files under seal	N/A	Last action on the contract + 12 years	Limitation Act 1980 (Section 8)	Secure Disposal	No	N/A	No	N/A	Electronic	No
Internal Services	Financial Services Manager	Contract files under signature	N/A	Life of the agreement + 12 years	Limitation Act 1980 (Section 8)	Secure Disposal	No	N/A	No	N/A	Electronic	No
Internal Services	Financial Services Manager	Unsuccessful tender documents	N/A	End of contract plus 6 years or end of contract plus 12 years for contracts under seal	Common Practice	Secure Disposal	Yes- identifiable natural persons only) - name, address, contact details	Legal obligation – Section 151 Local Government Act 1972	No	N/A	Electronic	No
Internal Services	Financial Services Manager	Successful tender documents	N/A	End of contract plus 6 years or end of contract plus 12 years for contracts under seal	Common Practice	Secure Disposal	Yes- identifiable natural persons only) - name, address, contact details	Legal obligation – Section 151 Local Government Act 1972	No	N/A	Electronic	No
Internal Services	Financial Services Manager	Procurement: Register of External Contracts	N/A	Register is permanent but individual contracts removed within 6 months of contract end date.	Common Practice	N/A continually updated	No	N/A	No	N/A	Electronic	No

² When building new IT systems for storing or accessing personal data, developing legislation, policy or strategies that have privacy implications, embarking on a data sharing initiative; or using data for new purposes, evaluation or scoring, including profiling, automated decision-making, systematic monitoring of individuals, processing sensitive data, processing data on a large scale, matching or combining datasets, processing data concerning vulnerable data subjects, innovative use or application of technological or organisational solutions, data transfer across borders outside the EU, when the processing in itself "prevents data subjects from exercising a right or using a service or a contract

FINANCIAL SERVICES - INFORMATION ASSET REGISTER 2018

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIAs	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. Secure Disposal/archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held manually and/or on electronic systems (including mobile devices)	Children (under 13) – parental consent normally required
Treasury												
Internal Services	Financial Services Manager	Records relating to money loaned by DBC to other bodies	N/A	Current year plus 6 years	HMRC - Compliance Handbook Manual CH15400	Secure Disposal	No	N/A	No	N/A	Electronic	No
Internal Services	Financial Services Manager	Records relating to money borrowed by DBC	N/A	Date of last repayment on the loan + 12 years	Limitation Act 1980 (Section 8)	Secure Disposal	No	N/A	No	N/A	Electronic	No
Internal Services	Financial Services Manager	Records relating to investments made by DBC	N/A	Date of last repayment on the loan + 12 years	Limitation Act 1980 (Section 8)	Secure Disposal	No	N/A	No	N/A	Electronic	No
Internal Services	Financial Services Manager	Treasury and Investments - working papers to support DBC's financial record	N/A	Current year plus 6 years	HMRC - Compliance Handbook Manual CH15400	Secure Disposal	No	N/A	No	N/A	Electronic	No
Misc.												
Internal Services	Financial Services Manager	Performance Indicators	N/A	If a performance indicator is no longer required, deactivate and archive the indicator and delete from Pentana after 1 year	Common Practice	Secure Disposal	No	N/A	No	N/A	Electronic on Pentana	No
Internal Services	Financial Services Manager	General correspondence – emails, letters, memos etc.	N/A	1 year unless considered important for future reference	Common Practice	Secure Disposal	Yes - identifiable natural persons only) - name, address, contact details	In accordance with the legislation referred to in this IAR	No	N/A	No	No

FINANCIAL SERVICES - INFORMATION ASSET REGISTER 2018

TECHNICAL & ORGANISATIONAL SECURITY MEASURES

Strategic Directorate	Information Asset Owner	IT Systems	Security Measures
Internal Services	I.C.T. Manager	Idox and department computers and laptops/internet /intranet – maintenance and administration	Password administration, data encryption, implementation of PSN based email services, IT services contingency planning, firewall barriers to hackers, virus protection software, full back-up, rescue disks, security audits, regular testing, assessing and evaluating the effectiveness of technical and organisational measures for ensuring the security of the processing, corporate guidance on organisational/security measure, DPIAs, DPA contract provisions
Internal Services	Policy & Corporate Support Manager	Pentana -- maintenance and administration	BS ISO/IEC 27001:2013 compliant
Internal Services	Financial Services Manager	Idox/Pentana/Intranet/Internet and computers and laptops -- input of data – the financial services function	Use of passwords, ISAs, appropriate contract clauses, use of PSN based email services, clear desk policy, departmental contingency planning, data retention, training, monitor screen position, physical security methods (e.g. locked cabinets), visitor passes, anonymisation, pseudonymisation, DPIAs, operational risk assessment, DPA contract provisions Dedicated IP address, up-to-date encryption protocols etc.
Internal Services	Customer Services Manager	On-line payments (hosted by Capita)	PCIDSS compliant
Internal Services	Customer Services Manager	AIMS – income management system – maintenance and administration	Password administration, data encryption, implementation of PSN based email services, IT services contingency planning, firewall barriers to hackers, virus protection software, full back-up, rescue disks, security audits, regular testing, assessing and evaluating the effectiveness of technical and organisational measures for ensuring the security of the processing, corporate guidance on organisational/security measure, DPIAs, DPA contract provisions
Internal Services	Financial Services Manager	ProContract	
Internal Services	Financial Services Manager with IT Services support	eFinancials - maintenance and administration	Password administration, data encryption, implementation of PSN based email services, IT services contingency planning, firewall barriers to hackers, virus protection software, full back-up, rescue disks, security audits, regular testing, assessing and evaluating the effectiveness of technical and organisational measures for ensuring the security of the processing, corporate guidance on organisational/security measure, DPIAs, DPA contract provisions
Internal Services	Financial Services Manager with IT Services support	eProcurement - maintenance and administration	Password administration, data encryption, implementation of PSN based email services, IT services contingency planning, firewall barriers to hackers, virus protection software, full back-up, rescue disks, security audits, regular testing, assessing and evaluating the effectiveness of technical and organisational measures for ensuring the security of the processing, corporate guidance on organisational/security measure, DPIAs, DPA contract provisions
Internal Services	Financial Services Manager with IT Services support	Logotec	Password administration, data encryption, implementation of PSN based email services, IT services contingency planning, firewall barriers to hackers, virus protection software, full back-up, rescue disks, security audits, regular testing, assessing and evaluating the effectiveness of technical and organisational measures for ensuring the security of the processing, corporate guidance on organisational/security measure, DPIAs, DPA contract provisions
Internal Services	Financial Services Manager with IT Services support	Systems Link	Password administration, data encryption, implementation of PSN based email services, IT services contingency planning, firewall barriers to hackers, virus protection software, full back-up, rescue disks, security audits, regular testing, assessing and evaluating the effectiveness of technical and organisational measures for ensuring the security of the processing, corporate guidance on organisational/security measure, DPIAs, DPA contract provisions

FINANCIAL SERVICES - INFORMATION ASSET REGISTER 2018

Strategic Directorate	Information Asset Owner	IT Systems	Security Measures
Internal Services	Customer Services Manager with IT Services support	Disaster recovery	See Business Continuity Plan
External Services	Enforcement & Regulatory Services Manager	CCTV – maintenance and administration	A key part of the Council's security setup

CONSENT, OUTSIDE EEA TRANSFERS, DATA PROCESSOR, MARKETING AND RISKS

Categories of data subjects	Recipients of personal/sensitive data	Information received from	If lawful basis for processing is CONSENT -is procedure in place for explicit consent and withdrawal of consent	Outside EEA Transfers YES/NO –if yes - check contractual requirements	Data Processor (i.e. processing undertaken by a third party under contract) & ISAs	Data Processor Contract Checked - to be varied to incorporate 2018 DPA requirements?	Marketing	Profiling	Risk category (to be mapped in accordance with the Council's corporate/strategic risk impact table) Operational Risk Register updated – YES/NO
Identifiable natural persons such as leaseholders, tenants, complainants, applicants, employees, service users etc.	1.Council department(s) 2.Zurich and other insurance companies 3.Local authorities 4.HMRC 5.National Fraud Initiative 6.Sedexo 7. Street UK 8. Analyse Local 9. Mid-Kent Shared services(Maidstone Borough Council) 10.Accesspay/Bacs	Analyse LOCAL – analysis of property & historical rating information to prepare estimate of business rate income for the forthcoming financial year Street UK Limited Sedexo	N/A	N/A	Pentana – Cloud based – retention only Secure Waste disposal Analyse LOCAL – locator information Street UK Sedexo Mid-Kent (Payroll) Access pay	Pentana - BS ISO/IEC 27001:2013 compliant Secure Waste Disposal – confidentiality clause in contract LOCAL - Contract annex agreed Street UK – Contract revision agreed Sedexo – compliant HR lead on contract Access pay contract agreed	N/A	N/A	Yes – MEDIUM

HOUSING CORPORATE PROPERTY MAINTENANCE - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIAs	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal/ archive	Personal Data ¹	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held manually and/or on electronic systems (including mobile devices)	Children (under 13) – parental consent normally required
External Services	Housing Maintenance Manager	Procedure/guidance on a range of matters	Applicable if policy or strategies have privacy implications	Supersedes previous version	Common Practice	Archive for 2 years -then dispose of	No	N/A	No	N/A	Electronic	N/A
Internal/ External Services	Housing Maintenance Manager	Planned/responsive maintenance procurement – to Council property portfolio –tenders, quotes etc.	N/A	6 years from date of works	Common Practice	Secure disposal	Yes (identifiable natural persons only) - name, address, contact details	Public interest task pursuant to Housing Act 1985	No	N/A	Electronic	N/A
External Services	Housing Maintenance Manager	Surveys - case file material – instructions reports, etc.	N/A	6 years from date of case file closure	Common Practice	Secure disposal	Yes (identifiable natural persons only) name, address, contact details	Public interest task pursuant to Housing Act 1985	No	N/A	Paper copy &/or electronic in Idox	N/A
External Services	Housing Maintenance Manager	Asbestos Register and Management Plans - for individual Council owned commercial properties	N/A	40 years from date of inspection	Statutory	Archive	Yes – location data	Legal obligation compliance - Control of Asbestos Regulations 2012	No	N/A	Paper copy &/or electronic	N/A
Internal/ External Services	Asset Holding Managers	Fire Certificates - for individual Council owned commercial properties	N/A	Whole life of the installation + 6 years	Statutory	Secure disposal	Yes (identifiable natural persons only) name, address, contact details	Public interest task pursuant to Regulatory Reform (Fire Safety) Order 2005	No	N/A	Paper copy &/or electronic	N/A
Internal/ External Services	Asset Holding Managers	Electrical installation Certificates – for individual Council owned commercial properties	N/A	Whole life of the installation + 6 years	Statutory	Secure disposal	Yes (identifiable natural persons only) name, address, contact details	Public interest task pursuant to Regulatory Reform (Fire Safety) Order 2005	No	N/A	Paper copy &/or electronic	N/A
Internal/ External Services	Asset Holding Managers	Energy Management – records relating to energy management in Council owned buildings	N/A	Current year + 6 years	Statutory	Secure disposal	No	N/A	No	N/A	Paper copy &/or electronic	N/A
Internal/ External Services	Asset Holding Managers	Equipment Testing – e.g. fire extinguishers, PAT testing etc.	N/A	Supersedes previous version	Common Practice	Secure disposal	Yes (identifiable natural persons only) - name, address, contact details	Public interest task pursuant to Regulatory Reform (Fire Safety) Order 2005	No	N/A	Paper copy &/or electronic	N/A

HOUSING CORPORATE PROPERTY MAINTENANCE - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIAs	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal/archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held manually and/or on electronic systems (including mobile devices)	Children (under 13) – parental consent normally required
External Services	Housing Maintenance Manager	Repairs & maintenance of Council housing stock – case file material including complaints, request for works, instructions to contractors etc.	N/A	Whole life of the installation + 6 years	Common Practice	Secure disposal	Yes (identifiable natural persons only - name, address, contact details)	Public interest task pursuant to Housing Act 1985	No	N/A	Paper copy &/or electronic	N/A
External Services	Housing Maintenance Manager	Waiting lists for sensitive planned works - e.g. OAP decs/disabled adaptations	N/A	Supersedes previous version	Common Practice	Secure disposal	Yes (identifiable natural persons only - name, address, contact details)	Public interest task pursuant to Housing Act 1985	Yes – health data	Substantial public interest	Electronic	N/A
External Services	Housing Maintenance Manager	Planned/responsive maintenance repair - requests to contractors for individual council properties	N/A	Whole life of the installation + 6 years	Common Practice	Secure disposal	Yes (identifiable natural persons only - name, address, contact details)	Public interest task pursuant to Housing Act 1985	No	N/A	Electronic	N/A
External Services	Housing Maintenance Manager	Gas Safety Checks' Certificates	N/A	Whole life of the installation + 6 years	Statutory	Secure disposal	Yes (identifiable natural persons only) - name, address, contact details	Public interest task pursuant to: Landlord & Tenant Act 1985 Gas Safety (Installation and Use) Regulations 1998	No	N/A	Electronic	N/A
External Services	Housing Maintenance Manager	Fire Risk Assessments	N/A	Whole life of the installation + 6 years	Statutory	Secure disposal	No	Public interest task pursuant to Regulatory Reform (Fire Safety) Order 2005	No	n/a	Electronic	N/A
External Services	Housing Maintenance Manager	Legionella Risk Assessments	N/A	Whole life of the installation + 6 years	Statutory	Archive	No	Public interest task pursuant to Health and Safety at Work etc. Act 1974	No	n/a	Electronic	N/A

HOUSING CORPORATE PROPERTY MAINTENANCE - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIAs	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal/ archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held manually and/or on electronic systems (including mobile devices)	Children (under 13) – parental consent normally required
External Services	Housing Maintenance Manager	Performance Indicators	N/A	If a performance indicator is no longer required, deactivate and archive the indicator and delete from Pentana after 1 year	Common Practice	Disposal	No	N/A	No	N/A	Electronic - Pentana	N/A
External Services	Housing Maintenance Manager	Correspondence (general) - emails, letters, memos etc.	N/A	3 years unless considered important for future reference	Common Practice	Secure disposal	Yes - (identifiable natural persons only) - name, address, contact details	Public interest task pursuant to Housing Act 1985	No	N/A	Paper copy/ Electronic	N/A
External Services	Housing Maintenance Manager	Disabled Adaptation recommendations	N/A	2 years after works completed	Common Practice	Secure disposal	Yes (identifiable natural persons only) - name, address, contact details	Public interest task pursuant to Housing Act 1985	Yes – health data	Substantial public interest	Paper copy &/or electronic	Yes – provided by parents /guardian
External Services	Housing Maintenance Manager	Safeguarding Referrals - concern cards from contractors	N/A	Immediately after referral processed and acknowledged by KCC	Statutory	Secure disposal	Yes - (identifiable natural persons only) - name, address, contact details	Legal obligation compliance – Care Act 2004	Yes – health data, alleged offences etc.	Legal obligation compliance	Paper copy &/or electronic	N/A
External Services	Housing Maintenance Manager	PV Register notifications	N/A	Immediately after adding to PV database	Common Practice	Secure disposal	Yes (identifiable natural persons only) – name, address	Public interest task – Health and Safety at Work etc. Act 1974	Yes – alleged offences	Substantial public interest	Electronic	N/A

HOUSING CORPORATE PROPERTY MAINTENANCE - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIAs	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal/ archive	Personal Data ⁱⁱ	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held manually and/or on electronic systems (including mobile devices)	Children (under 13) – parental consent normally required
External Services	Head of Housing	Councillor & MP Enquiries	N/A	3 years (unless considered important for future reference)	Common Practice	Secure Disposal	Yes -(identifiable natural persons only) – name, address, contact details	Public interest task pursuant to: Housing Act 1985 Housing Act 1996	Yes – health data etc. (as applicable)	Substantial public interest pursuant to Housing Act 1985 Housing Act 1996	Electronic	N/A
External Services	Head of Housing	Housing Ombudsman & Local Government & Social Care Ombudsman - complaints received and outcomes – case file material	N/A	Lifetime of tenancy or 2 years after closure of case.	Common Practice	Secure Disposal	Yes - identifiable natural persons only) – name, address, contact details	Public interest task – Local Government Act 1974	Yes – racial/ethnic origin, health data, alleged offences etc. (as applicable)	Substantial public interest task – Section 26(5) Local Government Act 1974	Paper copy &/or electronic in Idox	N/A
External Services	Head of Housing	Complaints – case file, correspondence etc.	N/A	Lifetime of tenancy or 3 years after closure of case.	Common Practice	Secure Disposal	Yes (identifiable natural persons only) - name, address, contact details	Public interest task pursuant to legislation referred to in this IAR	Yes - racial or ethnic origin, state of health etc.	Substantial public interest pursuant to legislation referred to in this IAR	Paper copy &/or electronic in Idox	YES – with parental consent
External Services	Head of Housing	Telephone recording – outgoing & incoming calls to DBC Housing staff for quality and training purposes	No	3 months from date of recording	Common Practice	Secure Disposal	Yes - identifiable natural persons only) - name, address, contact details/ financial data	Public interest task pursuant to legislation referred to in this IAR	No	N/A	Audio	No

HOUSING CORPORATE PROPERTY MAINTENANCE - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

TECHNICAL & ORGANISATIONAL SECURITY MEASURES

Strategic Directorate	Information Asset Owner	IT Systems	Security Measures
Internal Services	I.C.T. Manager	Idox/Academy/UNIFORM and department computers and mobile telephones/Internet/Intranet –maintenance and administration	Password administration, data encryption, implementation of PSN based email services, IT services contingency planning, firewall barriers to hackers, virus protection software, full back-up, rescue disks, security audits, regular testing, assessing and evaluating the effectiveness of technical and organisational measures for ensuring the security of the processing, corporate guidance on organisational/security measure, DPIAs, DPA compliant contracts
Internal Services	I.C.T. Manager	Secure transfer of data between DBC & Contractors	Data encryption, crypto cards
External Services	Housing Maintenance Manager	Idox/UNIFORM/Academy and computers and laptops/Internet/Intranet/Pentana - – input of data – corporate property maintenance functions	Use of passwords
Internal Services	Policy & Corporate Support Manager	Pentana – maintenance & administration	BS ISO/IEC 27001:2013 compliant
Internal Services	Customer Services Manager	On-line payments (hosted by Capita)	PCIDSS compliant
External Services	Housing Maintenance Manager	Disaster recovery	See Business Continuity Plan
External Services	Enforcement & Regulatory Services Manager	CCTV - maintenance & administration	A key part of the Council's security setup

HOUSING CORPORATE PROPERTY MAINTENANCE - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

CONSENT, OUTSIDE EEA TRANSFERS, DATA PROCESSOR, MARKETING AND RISKS

Categories of data subject	Recipients of personal/sensitive data	If lawful basis for processing is CONSENT -is procedure in place for explicit consent and withdrawal of consent	Outside EEA Transfers YES/NO –if yes – have you checked contractual requirements?	Data Processor (i.e. processing undertaken by a third party under contract) & ISAs	Data Processor Contract Checked - to be varied to incorporate 2018 DPA requirements	Marketing	Risk category (to be mapped in accordance with the Council's corporate/strategic risk impact table) Operational Risk Register updated YES/NO
Identifiable natural persons such as leaseholders, tenants, complainants, applicants, service users etc.	1.Council department(s) 2.Courts/tribunals etc. 3.Housing Associations 4.Contractors 5.Ombudsmen	N/A	N/A	Pentana – Cloud based – retention only Secure Waste Disposal - no processing The Breyer Group TSG Building Services Pinnacle PSG Frontline Data	Pentana - BS ISO/IEC 27001:2013 compliant Secure Waste Disposal – confidentiality clause in contract The Breyer Group - compliant TGS Building Services – compliant Pinnacle PSG - compliant Frontline Data - licence terms reviewed	N/A	YES –High - Score - 9

HOUSING MANAGEMENT - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIA ¹	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal/archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held Paper copy and/or on electronic systems (including mobile devices)	Children (under 13) – parental consent normally required
External Services	Head of Housing	Policies/strategies - on a range of housing matters	Applicable if policy or strategies have privacy implications	Supersedes previous version	Common Practice	Secure disposal	No	N/A	No	N/A	Paper copy & electronic	N/A
External Services	Head of Housing	The process for applying for council housing – forms and supporting material – application for mutual exchanges and supporting papers – application for transfer of tenancy and supporting papers	N/A	Lifetime of tenancy	Common Practice	Secure disposal	Yes (identifiable natural persons only) - name, address, contact details, age, gender, economic status, nationality	Public interest task – Housing Act 1985 Housing Act 1996	Yes - racial or ethnic origin, state of health	Substantial public interest – Housing Act 1985 Housing Act 1996	Paper copy and/or electronic	N/A
External Services	Head of Housing	Anti-Social Behaviour – case files and associated documents including , community protection notices, reports, decisions, diary logs etc.	N/A	5 years or 1 year end of legal action or Lifetime of tenancy CPNs - 2 years - from date of case closure (unless exceptional circumstances require longer retention e.g. pending court case or an appeal)	Common Practice	Secure disposal	Yes (identifiable natural persons only) - name, address, contact details	Public interest task/legal obligations - Anti-Social Behaviour Act 2003 Crime and Disorder Act 1998 Crime and Policing Act 2014	Yes - racial or ethnic origin, state of health, offences (including alleged offences) criminal proceedings outcomes and sentences (as applicable)	Substantial public interest /legal claims/ legal proceedings/ unlawful acts - Anti-Social Behaviour Act 2003 Crime and Disorder Act 1998 Crime and Policing Act 2014	Paper copy and/or electronic	N/A

¹ When building new IT systems for storing or accessing personal data, developing legislation, policy or strategies that have privacy implications, embarking on a data sharing initiative; or using data for new purposes, evaluation or scoring, including profiling, automated decision-making, systematic monitoring of individuals, processing sensitive data, processing data on a large scale, matching or combining datasets, processing data concerning vulnerable data subjects, innovative use or application of technological or organisational solutions, data transfer across borders outside the EU, when the processing in itself "prevents data subjects from exercising a right or using a service or a contract

HOUSING MANAGEMENT - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIA	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal/archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held Paper copy and/or on electronic systems (including mobile devices)	Children (under 13) – parental consent normally required
External Services	Head of Housing	The process for managing the tenancy of an individual - correspondence and information provided by other agencies relating to special needs of current tenant	N/A	Life of tenancy	Common Practice	Secure disposal	Yes (identifiable natural persons only) - name, address, contact details, age, gender, economic status, nationality	Public interest task- Housing Act 1985 Housing Act 1996	Yes - health data//	Substantial public interest/health purpose/ – Housing Act 1985 Housing Act 1996	Paper copy and/or electronic	N/A
External Services	Head of Housing	The process for managing the tenancy of an individual – records relating to ex-offenders	N/A	Life of tenancy	Common Practice	Secure disposal	Yes - (identifiable natural persons only) – name, address, contact details, age, gender, economic status, nationality	Public interest task Housing Act 1985 Housing Act 1996	Yes - offences (including alleged offences) criminal proceedings outcomes and sentences (as applicable)	Substantial public interest /legal claims/ legal proceedings/ unlawful acts –Housing Act 1985 Housing Act 1996	Paper copy and/or electronic	N/A
External Services	Head of Housing	Court Orders	N/A	Life of tenancy	Common Practice	Secure disposal	Yes - (identifiable natural persons only) – name, address, contact details	Public interest task – Anti-Social Behaviour Act 2003 Housing Act 1985 Housing Act 1996 Crime and Disorder Act 1998 Crime and Policing Act 2014	Yes - offences (including alleged offences)	Substantial public interest - Legal claims/legal proceedings- Social Behaviour Act 2003 Housing Act 1985 Housing Act 1996 Crime and Disorder Act 1998 Crime and Policing Act 2014	Paper copy and/or electronic	N/A

HOUSING MANAGEMENT - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIA	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal/archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held Paper copy and/or on electronic systems (including mobile devices)	Children (under 13) – parental consent normally required
External Services	Head of Housing	Rent arrears management - correspondence, sent, received, notes on Capita, account details, HB liaison forms completion, Discretionary Housing Payments, applications to court via PCOL	N/A	Lifetime of Tenancy	Common Practice	Secure disposal	Yes - (identifiable natural persons only) – name, address, contact details	Public interest task- Housing Act 1985 Housing Act 1996	Yes – offences (including alleged offences)	Substantial public interest - Legal claims/legal proceedings Housing Act 1985 Housing Act 1996	Paper copy and/or electronic	N/A
Internal/External Services	Head of Housing	Procurement relating to estate services	N/A	Lifetime of contract	Common Practice	Secure disposal	Yes - (identifiable natural persons only) – name, address, contact details	Public interest task – Housing Act 1985	No	N/A	Paper copy and/or electronic	N/A
External Services	Head of Housing	Resident meeting minutes	N/A	1 year from date of meeting	Common practice	Secure disposal	No	N/A	No	N/A	Paper copy & electronic	N/A
External Services	Head of Housing	Issuing requests to contractors for individual properties – estate cleaning contract	N/A	Lifetime of contract	Common Practice	Secure disposal	Yes - (identifiable natural persons only) – name, address, contact details	Public interest task – Housing Act 1985 Housing Act 1996	No	N/A	Electronic	N/A

HOUSING MANAGEMENT - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIA	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal/archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held Paper copy and/or on electronic systems (including mobile devices)	Children (under 13) – parental consent normally required
External Services	Head of Housing	Performance Indicators - the Housing Services function	N/A	If a performance indicator is no longer required, deactivate and archive the indicator and delete from Pentana after 1 year	Common Practice	Disposal	No	N/A	No	N/A	Electronic on Pentana	N/A
External Services	Head of Housing	General Correspondence – letters, emails memos etc.	N/A	3 years unless considered important for future reference	Common Practice	Secure disposal	Yes - (identifiable natural persons only) – name, address, contact details	Public interest task – Housing Act 1985 Housing Act 1996	No	Substantial public interest – Housing Act 1985 Housing Act 1996	Electronic	N/A
External Services	Head of Housing	Housing Ombudsman & Local Government & Social Care Ombudsman complaints received and outcomes	N/A	Lifetime of tenancy or 2 years after closure of case	Common Practice	Secure disposal	Yes - (identifiable natural persons only) – name, address, contact details	Public interest task – Local Government Act 1974	Yes- health data etc.	Substantial public interest /legal obligations – Section 26(5) Local Government Act 1974	Electronic	N/A
External Services	Head of Housing	CSU Daily Tasking - notes of meetings	N/A	Reviewed and then destroyed	Common Practice	Secure disposal	Yes - (identifiable natural persons only) – name, address, contact details	Public interest task - Crime and Disorder Act 1998 Crime and Policing Act 2014	Yes- alleged offences - criminal proceedings outcomes and sentences (as app)	Substantial public interest - Crime and Disorder Act 1998 Crime and Policing Act 2014	Electronic (email)	N/A

HOUSING MANAGEMENT - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIA	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal/archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held Paper copy and/or on electronic systems (including mobile devices)	Children (under 13) – parental consent normally required
External Services	Head of Housing	Councillor & MP Enquiries	N/A	3 years (unless considered important for future reference)	Common Practice	Secure Disposal	Yes - (identifiable natural persons only) – name, address, contact details	Public interest task pursuant to: Housing Act 1985 Housing Act 1996	Yes – health data etc. (as applicable)	Substantial public interest pursuant to Housing Act 1985 Housing Act 1996	Electronic	N/A
External Services	Head of Housing	Complaints – case file, correspondence etc.	N/A	Lifetime of tenancy or 3 years after closure of case	Common Practice	Secure Disposal	Yes (identifiable natural persons only) - name, address, contact details	Public interest task pursuant to legislation referred to in this IAR	Yes - racial or ethnic origin, state of health etc.	Substantial public interest pursuant to legislation referred to in this IAR	Paper copy &/or electronically in Idox	YES – with parental consent
External Services	Head of Housing	Telephone recording – outgoing & incoming calls to DBC Housing staff for quality and training purposes	No	3 months from date of recording	Common Practice	Secure Disposal	Yes - identifiable natural persons only) - name, address, contact details/ financial data	Public interest task pursuant to legislation referred to in this IAR	No	N/A	Audio	No

HOUSING MANAGEMENT - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIA	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal/archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held manually and/or on electronic systems (including mobile devices)	Children (under 18) -
External Services	Head of Housing	Safeguarding Referrals (children & adults at risk)	Yes	Life of tenancy	Common Practice	Secure Disposal	Yes – (identifiable natural persons only) - name , address, contact details	Public interest task/legal obligations – Children Act 2004/Care Act 2014 Statutory Guidance - Working Together to Safeguard Children Children Care & Support Statutory Guidance	Yes – health data, offences (including alleged offences)	Substantial public interest task/legal obligations – Children Act 2004/Care Act 2014 - Working Together to Safeguard Children Children Care & Support Statutory Guidance	Paper copy &/or electronic	Yes

HOUSING MANAGEMENT - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

TECHNICAL & ORGANISATIONAL SECURITY MEASURES

Strategic Directorate	Information Asset Owner	IT Systems	Security Measures
Internal Services	I.C.T. Manager	Idox/UNIFORM and department computers and laptops/internet/intranet –maintenance and administration	Password administration, data encryption, implementation of PSN based email services, IT services contingency planning, firewall barriers to hackers, virus protection software, full back-up, rescue disks, security audits, regular testing, assessing and evaluating the effectiveness of technical and organisational measures for ensuring the security of the processing, corporate guidance on organisational/security measure, DPIAs, DPA compliant contracts
External Services	Head of Housing	Idox/UNIFORM Academy/Pentana and computers and laptops/internet/intranet – the housing management function	Use of passwords
Internal Services	Policy & Corporate Support Manager	Pentana – maintenance & administration	BS ISO/IEC 27001:2013 compliant
Internal Services	Customer Services Manager	On-line payments (hosted by Capita)	PCIDSS compliant
Internal Services	I.C.T. Manager	Stay Connected email alerts (DBC website)	Subscriber own password – unsubscribe at any time
Internal Services	Head of Housing	Disaster recovery	See Business Continuity Plan
External Services	Enforcement & Regulatory Services Manager	CCTV – maintenance and administration	A key part of the Council's security setup

HOUSING MANAGEMENT - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

CONSENT, OUTSIDE EEA TRANSFERS, DATA PROCESSOR, MARKETING, PORTABILITY AND RISKS

Categories of data subject	Recipients of personal/sensitive data (as applicable)	If lawful basis for processing is CONSENT -is procedure in place for explicit consent and withdrawal of consent	Outside EEA Transfers YES/NO –if yes – have you checked contractual requirements?	Data Processor (i.e. processing undertaken by a third party under contract) & ISAs	Data Processor Contract Checked - to be varied to incorporate 2018 DPA requirements	Marketing	Portability	Risk category (to be mapped in accordance with the Council's corporate/strategic risk impact table) Operational Risk Register updated YES/NO
Identifiable natural persons such as applicants, tenants, leaseholders, complainants, service users etc.	1.Council department(s) 2.Ombudsman 3.Courts 4.Police 6.HMRC 7.Kent & Fire Rescue 8.NHS 9.Local authorities 10.Bailiffs 11.KCC (safeguarding) 12.DWP 13.Prison Service 14.Providers of contracted service for floating support referrals 15.HCLG – submission of data on the age, gender, economic status, ethnicity and nationality of lead tenant & their household members (CORE) 16. Housing Partners Ltd – provider of contracted service for mutual exchanges	YES – see Marketing – soft opt in rule (PECR)	N/A	Pentana – Cloud based – retention only Secure Waste Disposal - no processing – Kent & Medway Information Sharing Agreement	Pentana - BS ISO/IEC 27001:2013 compliant Secure Waste Disposal – confidentiality clause in contract KMISA - compliant		N/A	YES – High - risk score 8

HOUSING POLICY DEVELOPMENT - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIA ¹	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal/archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held manually and/or on electronic systems (including mobile devices)	Children (under 13) – parental consent normally required
External Services	Head of Housing	Policy and guidance - on a range of housing matters	Applicable if policy or strategies have privacy implications	Supersedes previous versions	Common Practice	Archive	No	N/A	No	N/A	Electronic and paper copy	N/A
External Services	Head of Housing	Appeals against banding assessment/access to housing register – case file - correspondence, decisions etc.	N/A	In accordance with the Kent Homechoice Partnership Protocol	Common Practice	Secure Disposal	Yes (identifiable natural persons only) - name, address, contact details	Public interest task pursuant to: Housing Act 1985 Housing Act 1996	Yes - – racial or Ethnic origin, state of health etc.	N/A	Electronic and paper copy - Idox & Locata	N/A
External Services	Head of Housing	Request for a review of suitability of accommodation – case file – correspondence, decisions etc.	N/A	6 years from date of expiry of tenancy (may need to be kept beyond the retention e.g. for evidential purposes)	Common Practice	Secure Disposal	Yes (identifiable natural persons only) - name, address, contact details	Public interest task pursuant to: Housing Act 1985 Housing Act 1996	Could contain personal data	N/A	Electronic and paper copy	N/A
External Services	Head of Housing	Performance Indicators - for the housing & development function	N/A	If a performance indicator is no longer required, deactivate and archive the indicator and delete from Pentana after 1 year	Common Practice	Disposal	No	N/A	No	N/A	Electronic on Pentana	N/A

¹ When building new IT systems for storing or accessing personal data, developing legislation, policy or strategies that have privacy implications, embarking on a data sharing initiative; or using data for new purposes, evaluation or scoring, including profiling, automated decision-making, systematic monitoring of individuals, processing sensitive data, processing data on a large scale, matching or combining datasets, processing data concerning vulnerable data subjects, innovative use or application of technological or organisational solutions, data transfer across borders outside the EU, when the processing in itself “prevents data subjects from exercising a right or using a service or a contract

HOUSING POLICY DEVELOPMENT - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIA	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal/archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held manually and/or on electronic systems (including mobile devices)	Children (under 13) - parental consent normally required
External Services	Head of Housing	Government statistical returns covering the whole of housing service	N/A	1 year from date of entry on MHCLG website	Statutory	Disposal	No	N/A	No	N/A	Electronic – anonymised data on MHCLG website	N/A
External Services	Head of Housing	Registration of individuals' housing applications – case file – correspondence, decisions etc.	N/A	6 years from date of expiry of tenancy (may need to be kept beyond the retention e.g. for evidential purposes)	Common Practice	Secure Disposal	Yes (identifiable natural persons only) name, address, contact details, financial data etc.	Public interest task pursuant to: Housing Act 1985 Housing Act 1996	Yes – racial or Ethnic origin, state of health etc.	Substantial public interest pursuant to Housing Act 1985 Housing Act 1996	Paper copy &/or electronic in Idox	No
External Services	Head of Housing	Help to Buy Applications – case file – correspondence, decisions etc.	N/A	6 years from date of expiry of tenancy (may need to be kept beyond the retention e.g. for evidential purposes)	Common Practice	Secure Disposal	Yes (identifiable natural persons only) - name, address, contact details	Performance of a contract/taking steps preparatory to such a contract	No	N/A	Electronic – (Help to Buy agent3 for Kent - Radian)	N/A
External Services	Head of Housing	Correspondence (general) – emails, letters, memos etc.	N/A	3 year unless considered important for future reference	Common Practice	Secure Disposal	Yes (identifiable natural persons only) - name, address, contact details	Public interest (subsidiary task)	No	N/A	Paper copy & or electronic	N/A
External Services	Head of Housing	Councillor & MP Enquiries	N/A	3 years (unless considered important for future reference)	Common Practice	Secure Disposal	Yes -(identifiable natural persons only) – name, address, contact details	Public interest task pursuant to: Housing Act 1985 Housing Act 1996	Yes – health data etc. (as applicable)	Substantial public interest pursuant to Housing Act 1985 Housing Act 1996	Electronic	N/A
External Services	Head of Housing	Housing Ombudsman & Local Government & Social Care Ombudsman - complaints received and outcomes – case file material	N/A	Lifetime of tenancy or 2 years after closure of case.	Common Practice	Secure Disposal	Yes - identifiable natural persons only) – name, address, contact details	Public interest task – Local Government Act 1974	Yes – racial/ethnic origin, health data, alleged offences etc.	Substantial public interest task – Section 26(5) Local Government Act 1974	Paper copy &/or electronic in Idox	N/A

HOUSING POLICY DEVELOPMENT - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIA	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal/archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held manually and/or on electronic systems (including mobile devices)	Children (under 13) - parental consent normally required
External Services	Head of Housing	Complaints – case file, correspondence etc.	N/A	Lifetime of tenancy or 3 years after closure of case.	Common Practice	Secure Disposal	Yes (identifiable natural persons only) - name, address, contact details	Public interest pursuant to legislation referred to in this IAR	Yes - racial or ethnic origin, state of health etc.	Substantial public interest pursuant to legislation referred to in this IAR	Paper copy &/or electronic in Idox	YES – with parental consent

TECHNICAL & ORGANISATIONAL SECURITY MEASURES

Strategic Directorate	Information Asset Owner	IT Systems	Security Measures
Internal Services	I.C.T. Manager	Idox/Academy and department computers and laptops/internet/intranet –maintenance and administration	Password administration, data encryption, implementation of PSN based email services, IT services contingency planning, firewall barriers to hackers, virus protection software, full back-up, rescue disks, security audits, regular testing, assessing and evaluating the effectiveness of technical and organisational measures for ensuring the security of the processing, corporate guidance on organisational/security measure, DPIAs, DPA compliant contracts
Internal Services	Policy & Corporate Support Manager	Pentana – maintenance & administration	BS ISO/IEC 27001:2013 compliant
External Services	Head of Housing	Idox/UNIFORM Academy/Pentana and computers and laptops/internet/intranet – the housing policy & development function	Use of passwords
External Services	Head of Housing	Locata - available Council properties advertised on Locata website	ISA - use of passwords by applicants - no access to data by other Kent authorities - authorised users only
External Services	Head of Housing	BPHA - home ownership and rental options	Use of password by applicants and BPHA only
Internal Services	Head of Housing	Disaster recovery	See Business Continuity Plan
External Services	Enforcement & Regulatory Services Manager	CCTV – maintenance and administration	A key part of the Council's security setup

HOUSING POLICY DEVELOPMENT - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

CONSENT, OUTSIDE EEA TRANSFERS, DATA PROCESSOR, MARKETING AND RISKS

Categories of data subject	Recipients of personal/sensitive data (as applicable)	If lawful basis for processing is CONSENT -is procedure in place for explicit consent and withdrawal of consent	Outside EEA Transfers YES/NO –if yes – have you checked contractual requirements?	Data Processor (i.e. processing undertaken by a third party under contract) & ISAs	Data Processor Contract Checked - to be varied to incorporate 2018 DPA requirements	Marketing	Risk category (to be mapped in accordance with the Council's corporate/strategic risk impact table) Operational Risk Register updated YES/NO
Identifiable natural persons such as leaseholders and tenants,	1.Council department(s) 2.Ombudsman 3. Homebuy Agent for Kent (BPHA)	N/A	N/A	Pentana – Cloud based – retention only Secure Waste Disposal - no processing - Kent & Medway ISA Kenthome Choice Partnership Protocol (for Locata)	Pentana - BS ISO/IEC 27001:2013 compliant Secure Waste Disposal – confidentiality clause in contract KMISA - compliant Kenthome Choice Partnership Protocol) – reviewed - compliant	N/A	YES – High – Score 9

HOUSING SCHEMES & FINANCE - INFORMATION ASSET REGISTER 2018

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIA ¹	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal/ archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held manually and/or on electronic systems (including mobile devices)	Children (under 13) – parental consent normally required
External Services	Head of Housing	Policies/Strategies on a range of housing matters	Applicable if policy or strategies have privacy implications	Supersedes preceding version	Common Practice	Archive	No	N/A	No	N/A	Paper copy & electronic	N/A
External Services	Head of Housing	The process for applying for specialist accommodation in housing schemes. (successful & unsuccessful applications) - forms and supporting material	N/A	Life of tenancy	Common Practice	Secure Disposal	Yes (identifiable natural persons only) - name, address, contact details, financial data etc.	Public interest task pursuant to: Housing Act 1985 Housing Act 1996	Yes - racial or ethnic origin, state of health etc.,	Substantial public interest pursuant to Housing Act 1985 Housing Act 1996	Paper copy &/or electronic in Idox	N/A
External Services	Head of Housing	The process for managing the tenancy of an individual - correspondence and information provided by other agencies relating to care or welfare needs of current tenant	N/A	Life of tenancy	Common Practice	Secure Disposal of paper copies, electronic records of outgoing tenant are overwritten on termination of tenancy	Yes (identifiable natural persons only) - name, address, contact details, financial data etc.	Public interest task pursuant to: Housing Act 1985 Housing Act 1996	Yes - health data	Substantial public interest pursuant to Housing Act 1985 Housing Act 1996	Paper copy &/or electronic in Idox and dedicated housing scheme electronic system	N/A

¹ When building new IT systems for storing or accessing personal data, developing legislation, policy or strategies that have privacy implications, embarking on a data sharing initiative; or using data for new purposes, evaluation or scoring, including profiling, automated decision-making, systematic monitoring of individuals, processing sensitive data, processing data on a large scale, matching or combining datasets, processing data concerning vulnerable data subjects, innovative use or application of technological or organisational solutions, data transfer across borders outside the EU, when the processing in itself "prevents data subjects from exercising a right or using a service or a contract

HOUSING SCHEMES & FINANCE - INFORMATION ASSET REGISTER 2018

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIA	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal/archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held manually and/or on electronic systems (including mobile devices)	Children (under 13) - parental consent normally required
External Services	Head of Housing	Garage rental applications - case file	N/A	6 years from expiry of tenancy	Common Practice	Secure Disposal	Yes (identifiable natural persons only) - name, address, contact details	Public interest pursuant to: Housing Act 1985 Housing Act 1996	No	N/A	Paper copy &/or electronic in Idox	N/A
External Services	Head of Housing	Court Orders – leaseholders case files	N/A	Life of tenancy	Common Practice	Secure Disposal	Yes - (identifiable natural persons only) – name, address, contact details	Public interest pursuant to: Housing Act 1985 Housing Act 1996	Yes - offences	Substantial public interest pursuant to Housing Act 1985 Housing Act 1996 Legal claims	Paper copy &/or electronic in Idox	N/A
Internal/External Services	Head of Housing	Procurement - relating to Out of Office Hours and Telecare services	N/A	Lifetime of contract or 6 years from expiry of contract	Common Practice	Secure Disposal	Yes - (identifiable natural persons only) – name, address, contact details	Public interest pursuant to: Housing Act 1985 Housing Act 1996	No	N/A	Paper copy and/or electronic	N/A
External Services	Head of Housing	Resident meetings - minutes	N/A	1 year from date of meeting	Common Practice	Secure Disposal	No	N/A	No	N/A	Paper copy & electronic	N/A
External Services	Head of Housing	Leasehold tenancies - – customer comments--case file material – instructions etc.	N/A	6 years from expiry of tenancy (may need to be kept beyond the retention e.g. for evidential purposes)	Common Practice	Secure Disposal	Yes - identifiable natural persons only) – name, address, contact details, financial data etc.	Public interest pursuant to: Housing Act 1985 Housing Act 1996	Yes – racial/ethnic origin, health data etc.	Substantial public interest pursuant to Housing Act 1985 Housing Act 1996	Paper copy &/or electronic in Idox	N/A

HOUSING SCHEMES & FINANCE - INFORMATION ASSET REGISTER 2018

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIA	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal/archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held manually and/or on electronic systems (including mobile devices)	Children (under 13) - parental consent normally required
External Services	Head of Housing	Age-specific Care & Welfare Referrals - correspondence and information provided by the tenant passed to other agencies relating to their care and welfare needs	N/A	Life of tenancy	Common Practice	Secure Disposal	Yes - (identifiable natural persons only) – name, address, contact details, marital status, NI number, employment status, preferred language, financial data	Public interest task pursuant to: Housing Act 1985 Housing Act 1996	Yes – health data, religion, sexual orientation, racial/ethnic origin	Substantial public interest pursuant to Housing Act 1985 Housing Act 1996	Paper copy & electronic on idox	N/A
External Services	Head of Housing	Correspondence (general) – letters, emails memos etc.	N/A	3 years (unless considered important for future reference)	Common Practice	Secure Disposal	Yes - (identifiable natural persons only) – name, address, contact details	Public interest task pursuant to the legislation detailed in this IAR	No	N/A	Electronic	N/A
External Services	Head of Housing	Councillor & MP Enquiries	N/A	3 years (unless considered important for future reference)	Common Practice	Secure Disposal	Yes - (identifiable natural persons only) – name, address, contact details	Public interest task pursuant to: Housing Act 1985 Housing Act 1996	Yes – health data etc. (as applicable)	Substantial public interest pursuant to Housing Act 1985 Housing Act 1996	Electronic	N/A
External Services	Head of Housing	Right-to Buys - case file material including applications, plans etc., credit reference agency searches	N/A	2 years from date of sale for freehold properties, life of tenancy for leasehold properties	Common Practice	Secure Disposal	Yes - - (identifiable natural persons only) – name, address, contact details, financial data etc.	Public interest task pursuant to: Housing Act 1985	No	Substantial public interest pursuant to Housing Act 1985	Paper copy &/or electronic in idox	N/A

HOUSING SCHEMES & FINANCE - INFORMATION ASSET REGISTER 2018

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIA	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal/archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held manually and/or on electronic systems (including mobile devices)	Children (under 13) - parental consent normally required
External Services	Head of Housing	Housing Ombudsman & Local Government & Social Care Ombudsman - complaints received and outcomes – case file material	N/A	Lifetime of tenancy or lease or 2 years after closure of case	Common Practice	Secure Disposal	Yes - identifiable natural persons only) – name, address, contact details	Public interest task – Local Government Act 1974	Yes – racial/ethnic origin, health data, alleged offences etc. (as applicable)	Substantial public interest task – Section 26(5) Local Government Act 1974	Paper copy &/or electronic in Idox	N/A
External Services	Head of Housing	Dartford Private Leasing Scheme Lease Agreements – Landlord details	N/A	2 years from end of lease	Common Practice	Secure Disposal	Yes - (identifiable natural persons only) – name, address, contact details	Public interest task pursuant to: Housing Act 1985 Housing Act 1996 Commonhold and Leasehold Reform Act 2002	No	N/A	Paper copy & electronic	N/A
External Services	Head of Housing	Community Centres Bookings – application forms etc.	N/A	2 years from end of hire	Common Practice	Secure Disposal	Yes - (identifiable natural persons only) – name, address, contact details, financial data	Public interest task pursuant to Housing Act 1985	No	N/A	Paper copy & electronic	N/A
External Services	Head of Housing	Performance Indicators –relating to the housing schemes & finance function	N/A	If a PI is no longer required, deactivate and archive the indicator and delete from Pentana after 1 year	Common Practice	Disposal	No	N/A	No	N/A	Electronic on Pentana	N/A

HOUSING SCHEMES & FINANCE - INFORMATION ASSET REGISTER 2018

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIA	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal/archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held manually and/or on electronic systems (including mobile devices)	Children (under 18) -
External Services	Head of Housing	MAPPA²/MARAC³ and Safeguarding Referrals (children & adults at risk) - case file material	N/A	Life of tenancy	Common Practice	Secure Disposal	Yes (identifiable natural persons only) - name, address, contact details	Public interest task/legal obligation pursuant to: Children Act 2004/Care Act 2014 Statutory Guidance - Working Together to Safeguard Children Children Care & Support Statutory Guidance	Yes - state of health, alleged offences -	Substantial public interest task/legal obligation – Children Act 2004/Care Act 2014 - Working Together to Safeguard Children Care & Support Statutory Guidance	Paper copy &/or electronically in Idox	Yes
External Services	Head of Housing	Complaints – case file, correspondence etc.	N/A	Lifetime of tenancy or 3 years after closure of case	Common Practice	Secure Disposal	Yes (identifiable natural persons only) - name, address, contact details	Public interest task pursuant to legislation referred to in this IAR	Yes - racial or ethnic origin, state of health etc.	Substantial public interest pursuant to legislation referred to in this IAR	Paper copy &/or electronically in Idox	YES – with parental consent

² Multi-Agency Public Protection Arrangements

³ Multi-Agency Risk Assessment Conference

HOUSING SCHEMES & FINANCE - INFORMATION ASSET REGISTER 2018

TECHNICAL & ORGANISATIONAL SECURITY MEASURES

Strategic Directorate	Information Asset Owner	IT Systems	Security Measures
Internal Services	I.C.T. Manager	Idox/UNIFORM/ Capita Housing and department computers and laptops/internet/intranet –maintenance and administration	Password administration, data encryption, implementation of PSN based email services, IT services contingency planning, firewall barriers to hackers, virus protection software, full back-up, rescue disks, security audits, regular testing, assessing and evaluating the effectiveness of technical and organisational measures for ensuring the security of the processing, corporate guidance on organisational/security measure, DPIAs & DPA contract provisions.
Internal Services	Policy & Corporate Support Manager	Pentana – maintenance & administration	BS ISO/IEC 27001:2013 compliant
External Services	Head of Housing	Idox/UNIFORM Capita Housing/ Pentana and computers and laptops /internet/intranet- – input of data – the housing schemes & finance function	Use of passwords
External Services	Head of Housing	Business & Disaster recovery	See Business Plan
External Services	Enforcement & Regulatory Services Manager	CCTV	A key part of the Council's security system

HOUSING SCHEMES & FINANCE - INFORMATION ASSET REGISTER 2018

CONSENT, OUTSIDE EEA TRANSFERS, DATA PROCESSOR, MARKETING AND RISKS

Categories of data subject	Recipients of personal/sensitive data (as applicable)	If lawful basis for processing is CONSENT -is procedure in place for explicit consent and withdrawal of consent	Outside EEA Transfers –if yes – have you checked contractual requirements?	Data Processor (i.e. processing undertaken by a third party under contract) & ISAs	Data Processor Contract Checked - to be varied to incorporate 2018 DPA requirements?	Marketing	Portability	Risk category (to be mapped in accordance with the Council's corporate/strategic risk impact table) Operational Risk Register updated YES/NO
Identifiable natural persons such as leaseholders, tenants, complainants, applicants, service users etc.	<ol style="list-style-type: none"> 1.Council department(s) 2.Courts/tribunals etc. 3.Housing Associations 4.Contractors 5.Ombudsman 6.Kent County Council (for referrals) 7.North West Kent Volunteer Centre 8.Kent fire & Rescue Service 9.Age Concern 10.Appetito 11.SAFFA (Soldiers, Sailors, Airmen & Families Association) 12.District Nurses 13.Impact Team (NHS) 14. Mental Health Team (NHS) 15.Occupational Therapist (NHS) 16.Self-funding care agencies 17 Home support cleaners (self-funders) 18.Volunteer Bureau 	N/A)	NO	<p>Pentana – Cloud based – retention only</p> <p>Secure Waste Disposal - no processing</p> <p>Review security of confidential sacks in offices</p> <p>SDC bulk printing – no processing</p> <p>Tunstall Healthcare Ltd (out of hours call centre)r</p> <p>Pinnacle PSG</p> <p>Kent & Medway Information Sharing Agreement</p>	<p>Pentana - BS ISO/IEC 27001:2013 compliant</p> <p>Secure Waste Disposal – confidentiality clause in contract</p> <p>SDC bulk printing SLA –includes confidentiality requirements</p> <p>Tunstall Healthcare Ltd - compliant</p> <p>Pinnacle PSG - compliant</p> <p>Compliant</p>	NO	N/A	Yes – high-score 9

HOUSING SOLUTIONS - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIA ¹	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal/archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held manually and/or on electronic systems (including mobile devices)	Children (under 13) – parental consent normally required
External Services	Head of Housing	Procedure/guidance - on a range of housing matters	Applicable if policy or strategies have privacy implications	Supersedes preceding version	Common Practice	Archive	No	N/A	No	N/A	Electronic	No
External Services	Head of Housing	The process for applying for council housing (successful & unsuccessful applications) - forms and supporting material (including from external agencies), medical assessment process, joint stock referrals, joint housing panels, needs & risk assessments, assessments for extra care units etc.	N/A	6 years from date of expiry of application if unsuccessful or Lifetime of tenancy if granted. (may need to be kept beyond the retention e.g. for evidential purposes)	Common Practice	Secure Disposal	Yes (identifiable natural persons only) name, address, contact details, financial data etc.	Public interest task pursuant to: Housing Act 1985 Housing Act 1996	Yes – racial or ethnic origin, state of health etc.	Substantial public interest pursuant to Housing Act 1985 Housing Act 1996	Paper copy &/or electronically in Idox	YES -with parental consent
External Services	Head of Housing	Downsize for Cash Scheme - application process	N/A	Permanent	Statutory	Archive	Yes (identifiable natural persons only) name, address, contact details, financial data etc.	Public interest task pursuant to: Housing Act 1985 Housing Act 1996	Yes– health data	Substantial public interest pursuant to: Housing Act 1985 Housing Act 1996	Paper copy &/or electronic in Idox	YES – with parental consent

¹ When building new IT systems for storing or accessing personal data, developing legislation, policy or strategies that have privacy implications, embarking on a data sharing initiative; or using data for new purposes, evaluation or scoring, including profiling, automated decision-making, systematic monitoring of individuals, processing sensitive data, processing data on a large scale, matching or combining datasets, processing data concerning vulnerable data subjects, innovative use or application of technological or organisational solutions, data transfer across borders outside the EU, when the processing in itself “prevents data subjects from exercising a right or using a service or a contract

HOUSING SOLUTIONS - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIA	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal/archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held manually and/or on electronic systems (including mobile devices)	Children (under 13) - parental consent normally required
External Services	Head of Housing	The process of awarding tenancies in council housing – case file material including tenancy agreements	N/A	Lifetime of tenancy	Common Practice	Secure Disposal	Yes - (identifiable natural persons only) name, address, contact details, financial data etc.	Public interest task pursuant to: Housing Act 1985 Housing Act 1996	Yes - -- racial or Ethnic origin, state of health etc.	Substantial public interest pursuant to: Housing Act 1985 Housing Act 1996	Paper copy &/or electronically in Idox	YES – with parental consent
External Services	Head of Housing	Homelessness – case file material including decisions Temporary Accommodation and relevant documentation Homeless Prevention activity including payments to landlords, loan agreements	N/A	6 years from date of file closure	Common Practice	Secure Disposal	Yes (identifiable natural persons only) name, address, contact details, financial data etc.	Public interest task/ compliance with a legal obligation pursuant to: Housing Act 1996 Homeless Reduction Act 2017	Yes	Substantial public interest pursuant to: Housing Act 1996 Homeless Reduction Act 2017	Paper copy &/or electronic in Idox	YES – with parental consent
External Services	Head of Housing	Dartford Private Sector Leasing Scheme - Including leases and maintenance records, rent accounts	N/A	Lifetime of Tenancy or 6 years from date of file closure	Common Practice	Secure Disposal	Yes (identifiable natural persons only) name, address, contact details, financial data etc.	Public interest task pursuant to: Housing Act 1985 Housing Act 1996 Commonhold and Leasehold Reform Act 2002	Yes - -- racial or ethnic origin, state of health etc.	Substantial public interest pursuant to: Housing Act 1985 Housing Act 1996	Paper copy &/or electronic in Idox	YES – with parental consent

HOUSING SOLUTIONS - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIA	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal/archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held manually and/or on electronic systems (including mobile devices)	Children (under 13) - parental consent normally required
External Services	Head of Housing	Housing Ombudsman & Local Government & Social Care Ombudsman -complaints received and outcomes	N/A	Lifetime of tenancy or 2 years after closure of case	Common Practice	Secure Disposal	Yes (identifiable natural persons only) name, address, contact details	Public interest task – Local Government Act 1974	Yes - racial or ethnic origin, state of health etc.	Substantial public interest – Section 26(5) Local Government Act 1974	Paper copy &/or electronically in Idox	N/A
External Services	Head of Housing	Complaints – case file, correspondence etc.	N/A	Lifetime of tenancy or 3 years after closure of case	Common Practice	Secure Disposal	Yes (identifiable natural persons only) - name, address, contact details	Public interest task pursuant to legislation referred to in this IAR	Yes - racial or ethnic origin, state of health etc.	Substantial public interest pursuant to legislation referred to in this IAR	Paper copy &/or electronically in Idox	YES – with parental consent
External Services	Head of Housing	Performance Indicators – relating to the housing options function	N/A	If a performance indicator is no longer required, deactivate and archive the indicator and delete from Pentana after 1 year	Common Practice	Disposal	No	N/A	No	N/A	Electronic	N/A
External Services	Head of Housing	General Correspondence – emails, letters memos etc. -	N/A	3 years unless considered important for future reference	Common Practice	Secure Disposal	Yes (identifiable natural persons only) - name, address, contact details	Public interest task pursuant to legislation referred to in this IAR	No	N/A	Electronic & paper copy	N/A
External Services	Head of Housing	Councillor & MP Enquiries	N/A	3 years (unless considered important for future reference)	Common Practice	Secure Disposal	Yes - (identifiable natural persons only) – name, address, contact details	Public interest task pursuant to: Housing Act 1985 Housing Act 1996	Yes – health data etc. (as applicable)	Substantial public interest pursuant to Housing Act 1985 Housing Act 1996	Electronic	N/A

HOUSING SOLUTIONS - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIA	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal/archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held manually and/or on electronic systems (including mobile devices)	Children (under 18) -
External Services	Head of Housing	MAPPA²/MARAC³ and Safeguarding Referrals (children & adults at risk) - case file material	N/A	Life of tenancy	Common Practice	Secure Disposal	Yes (identifiable natural persons only) - name, address, contact details	Public interest task/legal obligation pursuant to: Children Act 2004/Care Act 2014 Statutory Guidance - Working Together to Safeguard Children Children Care & Support Statutory Guidance	Yes - state of health, alleged offences -	Substantial public interest /legal obligation – Children Act 2004/Care Act 2014 - Working Together to Safeguard Children Care & Support Statutory Guidance	Paper copy &/or electronically in Idox	Yes
External Services	Head of Housing	Multi-disciplinary team referrals – provision of practical assistance for persons in need	N/A	Life of tenancy	Common Practice	Secure Disposal	Yes (identifiable natural persons only) - name, address, contact details	Public interest task pursuant to legislation referred to in this IAR	Yes - state of health	Substantial public interest pursuant to legislation referred to in this IAR	Paper copy &/or electronically in Idox	Yes – with parental consent
External Services	Head of Housing	Telephone recording – outgoing & incoming calls to DBC Housing staff for quality and training purposes	No	3 months from date of recording	Common Practice	Secure Disposal	Yes - identifiable natural persons only) - name, address, contact details/ financial data	Public interest task pursuant to legislation referred to in this IAR	No	N/A	Audio	No

² Multi-Agency Public Protection Arrangements

³ Multi- Agency Risk Assessment Conference

HOUSING SOLUTIONS - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

TECHNICAL & ORGANISATIONAL SECURITY MEASURES

Strategic Directorate	Information Asset Owner	IT Systems	Security Measures
Internal Services	I.C.T. Manager	Idox/UNIFORM/ Academy and department computers and laptops/internet /intranet –maintenance and administration	Password administration, data encryption, implementation of PSN based email services, IT services contingency planning, firewall barriers to hackers, virus protection software, full back-up, rescue disks, security audits, regular testing, assessing and evaluating the effectiveness of technical and organisational measures for ensuring the security of the processing, corporate guidance on organisational/security measure, DPIAs, DPA compliant contracts
Internal Services	Policy & Corporate Support Manager	Pentana – maintenance & administration	BS ISO/IEC 27001:2013 compliant
External Services	Head of Housing	Idox/UNIFORM Academy/Pentana and computers and laptops/ Internet/intranet - - input of data – the landlord & tenant function	Use of passwords
External Services	Head of Housing	Kent Home Choice/Locata	Data Sharing Protocol operated by the KHC Partnership
External Service	Head of Housing	Firmstep	Data Sharing Contract signed. Secure website with password access
Internal Services	I.C.T. Manager	Stay Connected email alerts (DBC website)	Subscriber own password – unsubscribe at any time
External Services	Head of Housing	Disaster recovery	See Business Continuity Plan
External Services	Enforcement & Regulatory Services Manager	CCTV – maintenance and administration	A key part of the Council's security setup

HOUSING SOLUTIONS - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

CONSENT, OUTSIDE EEA TRANSFERS, DATA PROCESSOR, MARKETING AND RISKS

Categories of data subject	Recipients of personal/sensitive data	If lawful basis for processing is CONSENT -is procedure in place for explicit consent and withdrawal of consent	Outside EEA Transfers YES/NO -if yes – have you checked contractual requirements?	Data Processor (i.e. processing undertaken by a third party under contract) & ISAs	Data Processor Contract Checked - to be varied to incorporate 2018 DPA requirements	Marketing	Profiling	Risk category (to be mapped in accordance with the Council's corporate/strategic risk impact table) Operational Risk Register updated YES/NO
Identifiable natural persons such as leaseholders, tenants, complainants, applicants, service users etc.	<ol style="list-style-type: none"> 1. Council department(s) 2. Courts/tribunals etc. 3. Housing Associations 4. Contractors 5. Ombudsmen 6. Kent Homechoice Partnership 7. Police 8. Socila Services 9. KCC 10. Porchlight 11. YMCA 12. MP 13. Councillors 14. Independent Domestic Violence Advocate 15. Now Medical 16. Firmstep 17. Hub Agencies 18. Multi-disciplinary teams 	N/A	NO	<p>Pentana – Cloud based – retention only</p> <p>Secure Waste Disposal - no processing</p> <p>SDC bulk printing – no processing</p> <p>Kent Homechoice Partnership (KHCP)</p> <p>Kent & Medway ISA</p> <p>Porchlight</p> <p>Independent Reviews Ltd</p>	<p>Pentana - BS ISO/IEC 27001:2013 compliant</p> <p>Secure Waste Disposal – confidentiality clause in contract</p> <p>SDC bulk printing SLA</p> <p>KHCP - being reviewed</p> <p>KMISA - compliant</p> <p>Porchlight – to be reviewed</p> <p>Independent Reviews - to be reviewed</p>	N/A	N/A	YES – High – Score 9

HUMAN RESOURCES & PAYROLL SERVICE - INFORMATION ASSET REGISTER& RECORD OF PROCESSING ACTIVITY (ROPA)

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIA ¹	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. Secure disposal/archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held manually and/or on electronic systems (including mobile devices)	Children (under 13) – parental consent normally required
Internal Services	HR Manager	Job Profiles	N/A	Date Job Profile superseded + 6 years	Common Practice	Secure disposal	No	N/A	No	N/A	Electronic – Council computer/intranet- website	N/A
Internal Services	HR Manager	Recruitment and Selection – records relating to the process concerning unsuccessful candidates	N/A	Date Recruitment Finalised + 1 year	Common Practice	Secure disposal	Yes - name, address, contact details	Performance of a contract/taking steps preparatory to such a contract	Yes – racial and ethnic origin, health data etc.	Performance of a contract/taking steps preparatory to such a contract	Electronic – Council computer	N/A
Internal Services	HR Manager	Recruitment and Selection – records relating to the selection of an individual for an established post	N/A	Date of Termination + 6 years	Common Practice	Secure disposal	Yes - name, address, contact details	Performance of a contract/taking steps preparatory to such a contract	Yes – racial and ethnic origin, health data etc.	Carrying out of obligations under employment	Electronic – Council computer	N/A
Internal Services	HR Manager	Right to Work – Copy documentation taken as part of right to work evidence	Yes	Date of Termination + 6 years	Statutory	Secure disposal	Yes - name, address, contact details	Performance of a contract/taking steps preparatory to such a contract	Yes – racial and ethnic origin, health data etc.	Legal obligation compliance	Electronic – Council computer/HR and Payroll System	N/A
Internal Services	HR Manager	Induction – Records relating to employee induction	Yes	Date of Termination + 6 years	Common Practice	Secure disposal	Yes - name, address, contact details	Performance of a contract/taking steps preparatory to such a contract	Yes	Performance of a contract/taking steps preparatory to such a contract	Electronic – Council computer/HR and Payroll System	N/A

¹ When building new IT systems for storing or accessing personal data, developing legislation, policy or strategies that have privacy implications, embarking on a data sharing initiative; or using data for new purposes, evaluation or scoring, including profiling, automated decision-making, systematic monitoring of individuals, processing sensitive data, processing data on a large scale, matching or combining datasets, processing data concerning vulnerable data subjects, innovative use or application of technological or organisational solutions, data transfer across borders outside the EU, when the processing in itself “prevents data subjects from exercising a right or using a service or a contract”

HUMAN RESOURCES & PAYROLL SERVICE - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

Strategic Directorate	Information Asset Owner(s)	Record/Information Description	DPIA	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. Secure disposal/archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held manually and/or on electronic systems (including mobile devices)	Children (under 13) – parental consent normally required
Internal Services	HR Manager	Disclosure Scotland Checks	N/A	Date of Termination + 6 years	Common Practice	Secure disposal	Yes - name, address, contact details	Performance of a contract/taking steps preparatory to such a contract	Yes – criminal convictions	Performance of a contract/taking steps preparatory to such a contract/legal obligation compliance	Electronic – Council computer/ HR and Payroll System	N/A
Internal Services	HR Manager	Personnel Files – records relating to an individual's employment history	N/A	Date of Termination + 6 years	Common Practice	Secure disposal	Yes - name, address, contact details, financial data, post number, appraisals etc.	Performance of a contract	Yes - health data, criminal convictions etc.	Performance of a contract	Electronic – Council computer/ HR and Payroll System	N/A
Internal Services	HR Manager	Job Evaluations – records relating to job evaluation of an individual's post	N/A	Date of Termination + 6 years	Common Practice	Secure disposal	Yes – post number, salary etc.	Performance of a contract/taking steps preparatory to such a contract	No	N/A	Electronic – Council computer/ HR and Payroll System	N/A
Internal Services	HR Manager	Job Evaluations – records relating to job evaluation of the Council's establishment	N/A	Date Job Evaluation Superseded + 6 years	Common Practice	Secure disposal	No	N/A	No	N/A	Electronic – Council computer	N/A
Internal Services	HR Manager	Pre-Employment Health Questionnaires	N/A	Date of Termination + 6 years	Common Practice	Secure disposal	Yes - name, address, contact details	Performance of a contract/taking steps preparatory to such a contract	Yes – health data	Performance of a contract	Electronic – Council computer/ HR and Payroll System	N/A
Internal Services	HR Manager	Occupational Health Referrals – documentation relating to OH referrals	N/A	Date of termination + 6 years	Common Practice	Secure disposal	Yes - name, address, contact details	Performance of a contract	Yes – health data	Performance of a contract	Electronic – Council computer/ HR and Payroll System	N/A
Internal Services	HR Manager	Employee Absence - records relating to the monitoring of employee absence	N/A	Date of termination + 6 years	Common Practice	Secure disposal	Yes - name, address, contact details	Performance of a contract/taking steps preparatory to such a contract	Yes	Performance of a contract	Electronic – Council computer/ HR and Payroll System	N/A
Internal Services	HR Manager	Employee Absence – Bradford Factor Score monitoring – monthly reports to management	N/A	Current year + 1 year	Common Practice	Secure disposal	Yes – name, post title etc.	Performance of a contract	Yes – health data	Performance of a contract	Electronic – Council computer/ HR and Payroll System	N/A

HUMAN RESOURCES & PAYROLL SERVICE - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

Strategic Directorate	Information Asset Owner(s)	Record/Information Description	DPIA	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. Secure disposal/archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held manually and/or on electronic systems (including mobile devices)	Children (under 13) – parental consent normally required
Internal Services	HR Manager	Disciplinary Records where there is a case to answer – case file - all records relating to disciplinary action including employment tribunal documents (but excluding ET decisions)	N/A	Date of termination + 6 years	Common Practice	Secure disposal	Yes - name, address, contact details	Performance of a contract	Yes - health data, alleged offences etc.	Performance of a contract/legal claims/legal proceedings	Electronic – Council computer/HR and Payroll System	N/A
Internal Services	HR Manager	Disciplinary Records where there is no case to answer – case file – all records relating to disciplinary investigation etc.	N/A	Conclusion of investigation	Common Practice	Secure disposal	Yes - name, address, contact details	Performance of a contract	Yes - health data, alleged offences etc.	Performance of a contract	Electronic – Council computer/HR and Payroll System	N/A
Internal Services	HR Manager	Employment Tribunal – records relating to an Employment Tribunal decisions -	N/A	Current year + 6 years	Common Practice	Secure disposal	Yes - name, address, contact details	Performance of a contract/taking steps preparatory to such a contract	Yes	Legal claims/proceedings	Electronic – Council computer	N/A
Internal Services	HR Manager	Grievance Records – case file - all records relating to a grievance, decisions etc.	N/A	Current year + 6 years	Common Practice	Secure disposal	Yes - name, address, contact details	Performance of a contract	Yes – health data, alleged offences etc.	Performance of a contract	Electronic – Council computer/HR and Payroll System	N/A
Internal Services	HR Manager	Performance Capability - case file - all records relating to performance capability, decisions etc.	N/A	Date of termination + 6 years	Common Practice	Secure disposal	Yes - name, address, contact details	Performance of a contract	No	N/A	Electronic – Council computer/HR and Payroll System	N/A
Internal Services	HR Manager	Ill Health Capability - case file - all records relating to ill health capability, decisions etc.	N/A	Date of termination + 6 years	Common Practice	Secure disposal	Yes - name, address, contact details	Performance of a contract	Yes – health data	Performance of a contract	Electronic – Council computer/HR and Payroll System	N/A
Internal Services	HR Manager	Ill Health Retirement - case file - all records relating to ill health retirement	Yes	Date of termination + 6 years for Tier 1 ill health retirements. Date of final pension payment + 6 years for Tier 2 and 3 ill health retirements	Common Practice	Secure disposal	Yes - name, address, contact details	Performance of a contract	Yes – health data	Performance of a contract	Electronic – Council computer/HR and Payroll System	N/A

HUMAN RESOURCES & PAYROLL SERVICE - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

Strategic Directorate	Information Asset Owner(s)	Record/Information Description	DPIA	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. Secure disposal/archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held manually and/or on electronic systems (including mobile devices)	Children (under 13) – parental consent normally required ²
Internal Services	HR Manager	Risk Assessments - all records relating to pregnancy or health risk assessments	N/A	Date of termination + 6 years	Common Practice	Secure disposal	Yes - name, address, contact details	Performance of a contract	Yes – health data	Performance of a contract	Electronic – Council computer/ HR and Payroll System	N/A
Internal Services	HR Manager	Training – All records relating to First Aid / Fire Marshal Training	N/A	Date of training + 3 years	Common Practice	Secure disposal	Yes	Performance of a contract	Yes	Performance of a contract	Electronic – Council computer	N/A
Internal Services	HR Manager	Training – Training Course Materials	N/A	Dynamic materials – supersedes previous version	Common Practice	Archive	No	N/A	No	N/A	Electronic – Council computer	N/A
Internal Services	HR Manager	HR Policies and Procedures – all HR Policies and Procedures including Employee Handbook	Yes -	Dynamic materials – supersedes previous version	Common Practice	Archive	No	N/A	No	N/A	Electronic – Council computer/ intranet	N/A
Internal Services	HR Manager	Corporate Training Plan	N/A	Dynamic document – supersedes previous version	Common Practice	Archive	No	N/A	No	N/A	Electronic – Council computer/ intranet	N/A
Internal Services	HR Manager	Employee Corporate Training Records – Centrally Held. attendance lists, course instructions, emails, booking forms.	N/A	Date of Training + 3 years	Common Practice	Secure disposal	Yes – name, post, title etc.	Performance of a contract	No	N/A	Electronic – Council computer	N/A
Internal Services	HR Manager	Training – proof of completion, certificates, exam results etc.	N/A	Date of Termination + 6 years	Common Practice	Secure disposal	Yes – name, post, title etc.	Performance of a contract	No	N/A	Electronic – Council computer	N/A
Internal Services	HR Manager	Training - course cancellation monitoring	N/A	Current year + one year	Common Practice	Secure disposal	Yes - name, post, title etc.	Performance of a contract	No	N/A	Electronic – Council computer	N/A
Internal Services	HR Manager	Workforce Strategies – key HR activities over next 5 years, strategy papers and supporting information documentation	No	Current year + 6 years	Common Practice	Disposal	No	N/A	No	N/A	Electronic – Council computer/ intranet	N/A
Internal Services	HR Manager	Restructures – All restructure reports	N/A	Current year + 3 years	Common Practice	Secure disposal	No	N/A	No	N/A	Electronic – Council computer	N/A

HUMAN RESOURCES & PAYROLL SERVICE - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

Strategic Directorate	Information Asset Owner(s)	Record/Information Description	DPIA	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. Secure disposal/archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held manually and/or on electronic systems (including mobile devices)	Children (under 13) – parental consent normally required
Internal Services	HR Manager	Performance Indicators	N/A	1 year from date of entry on Pentana (unless required for comparison purposes)	Common Practice	Disposal	No	N/A	No	N/A	Electronic - Pentana	N/A
Internal Services	HR Manager	General correspondence – emails, letters, memos etc. (excluding employee case files)	N/A	1 year unless considered important for future reference	Common Practice	Secure disposal	Yes- - name, address, contact details	Performance of a contract	No	N/A	Electronic – Council computer	N/A
Internal Services	HR Manager	Health Management – occupational health	N/A		Common Practice	Secure Disposal	Yes- - name, address, contact details	Performance of a contract	Yes – health related data	Performance of a contract	Electronic – Council computer	N/A
Internal Services	HR Manager	UCheck- DBS checks	N/A	The certificate is the property of the person who has been checked. The certificate number and renewal date is held centrally - Date of Termination + 6 years	Common Practice	Secure Disposal	Yes- - name, address, contact details	Performance of a contract	Yes- criminal convictions	Performance of a contract	Electronic – Council compute	N/A

HUMAN RESOURCES & PAYROLL SERVICE - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

TECHNICAL & ORGANISATIONAL SECURITY MEASURES

Strategic Directorate	Information Asset Owner	IT Systems	DPIA	Security Measures
Internal Services	I.C.T. Manager	Department computers and laptops/Internet/ Intranet – maintenance and administration	N/A	Password administration, data encryption, implementation of PSN based email services, IT services contingency planning, firewall barriers to hackers, virus protection software, full back-up, rescue disks, security audits, regular testing, assessing and evaluating the effectiveness of technical and organisational measures for ensuring the security of the processing, corporate guidance on organisational/security measure, DPIAs
Internal Services	HR Manager	iTrent (HR and Payroll System) and computers and laptops – input of data – the HR function	Yes	Use of passwords, use of PSN based email services
Internal Services	I.C.T. Manager	iTrent (HR and Payroll System) – maintenance and administration	N/A	Firewall barriers to hackers, virus protection software, assessing and evaluating the effectiveness of technical and organisational measures for ensuring the security of the processing
Internal Services	HR Manager	Health Management	N/A	
Internal Services	HR Manager	UCheck – DBS checks	N/A	
Internal Services	HR Manager with IT Services support	Disaster recovery	N/A	See Business Continuity Plan
External Services	Enforcement & Regulatory Services Manager	CCTV – maintenance and administration	Yes	A key part of the Council's security setup

HUMAN RESOURCES & PAYROLL SERVICE - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

CONSENT, OUTSIDE EEA TRANSFERS, DATA PROCESSOR, MARKETING, PORTABILITY AND RISKS

Categories of data subjects	Recipients of personal/sensitive data	If lawful basis for processing is CONSENT -is procedure in place for explicit consent and withdrawal of consent	Outside EEA Transfers - if yes - check contractual requirements	Data Processor (i.e. processing undertaken by a third party under contract) & ISAs	Data Processor Contract Checked - to be varied to incorporate 2018 DPA requirements	Marketing	Portability	Risk category (to be mapped in accordance with the Council's corporate/strategic risk impact table) Operational Risk Register updated – YES/NO
Identifiable natural persons such as employees, prospective employees and past employees etc.	1.Council department(s) 2.Courts/tribunals etc. 3.4.Mid Kent Services (payroll service) 5.Training providers 6.Health Management (Occupational Health) 7.uCheck (DBS checks) 8.JobsgopublicATS (candidate application tracking system)	N/A	N/A	Pentana – Cloud based – retention only Secure Waste Secure disposal - no processing - Mid Kent Services (hosted by Maidstone Borough Council) – provision of the payroll service pursuant to a collaboration agreement Kent & Medway Information Sharing Agreement	Pentana - BS ISO/IEC 27001:2013 compliant Secure Waste Secure disposal – confidentiality clause in contract Mid Kent Services - - compliant K&MISA - compliant	NO	Yes- automated personal data. knowingly and actively provided by the data subject	YES - High – 9

(IT) INFORMATION TECHNOLOGY - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIA ¹	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal/archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held manually and/or on electronic systems (including mobile devices)	Children (under 13) – parental consent normally required
Internal Services	I.C.T. Manager	Network management including user account administration, logs, technical & incident reports etc.	Applicable if building new IT systems	Review 2 years after closure of account etc.	Common Practice	Deletion of electronic records, secure disposal of paper	Yes - name, post titles, passwords etc.	Performance of employment contract	No	N/A	Paper and/or electronic	No
Internal Services	I.C.T. Manager	IT systems and databases e.g. shared corporate systems not identified elsewhere	Applicable if building new IT systems	As determined by user departments	Common Practice	Deletion	As determined by user departments	As determined by user departments	As determined by user departments	As determined by user departments	Electronic	No
Internal Services	I.C.T. Manager	IT services, system and project documentation – including policies/procedures	Applicable if policy or strategies have privacy implications	Review 2 years after implementation	Common Practice	Deletion of electronic records, secure disposal of paper	No	N/A	No	N/A	Paper and/or electronic	No
Internal Services	I.C.T. Manager	IT procurement – tenders, draft contracts, correspondence etc.	Applicable when building a new IT system	Review 3 years after termination of contract	Common Practice	Deletion of electronic records (other than contracts), secure disposal of paper	Yes - (identifiable natural persons only) – name, address, contact details	Performance of a contract/ taking steps preparatory to such a contract	No	N/A	Paper and/or electronic	No
Internal Services	I.C.T. Manager	IT Contracts	Applicable when building a new IT system	See above entry	Common Practice	Deletion of electronic records, secure disposal of paper	Yes - (identifiable natural persons only) – name, address etc.	Performance of a contract	No	N/A	Paper and/or electronic	No
Internal Services	I.C.T. Manager	Equipment – licences, maintenance records	N/A	Review 2 years after expiry of licence	Common Practice	Deletion of electronic records, secure disposal of paper	Yes - (identifiable natural persons only) – name, address etc.	Public interest task	No	N/A	Paper and/or electronic	No

¹ When building new IT systems for storing or accessing personal data, developing legislation, policy or strategies that have privacy implications, embarking on a data sharing initiative; or using data for new purposes, evaluation or scoring, including profiling, automated decision-making, systematic monitoring of individuals, processing sensitive data, processing data on a large scale, matching or combining datasets, processing data concerning vulnerable data subjects, innovative use or application of technological or organisational solutions, data transfer across borders outside the EU, when the processing in itself “prevents data subjects from exercising a right or using a service or a contract”

(IT) INFORMATION TECHNOLOGY - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIA	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal/ archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held manually and/or on electronic systems (including mobile devices)	Children (under 13) – parental consent normally required
Internal Services	I.C.T. Manager	IT Service plans, strategies, performance and management records	Applicable if policy or strategies have privacy implications	Review 2 years after closure	Common Practice	Deletion of electronic records, secure disposal of paper	No	N/A	No	N/A	Paper and/or electronic	No
Internal Services	I.C.T. Manager	Performance Indicators	N/A	1 year from date of entry on Pentana (unless required for comparison purposes)	Common Practice	Deletion	No	N/A	No	N/A	Electronic - Pentana	No
Internal Services	I.C.T. Manager	Correspondence (general) – emails, letters, memos etc.	N/A	1 year unless considered important for future reference	Common Practice	Deletion of electronic records, secure disposal of paper	Yes - (identifiable natural persons only) – name, address, contact details	Public interest task	No	N/A	Paper and/or electronic	No

(IT) INFORMATION TECHNOLOGY - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

(IT) INFORMATION TECHNOLOGY SYSTEMS – DATA PROCESSOR AND RISKS

Strategic Directorate	Information Asset Owner	Administration/maintenance	GDPR Compliant	Data Processor (i.e. processing undertaken by a third party under contract) &/or use of external servers as hosts	Data Processor Contract Checked - to be varied to incorporate 2018 DPA requirements Y	Risk category (to be mapped in accordance with the Council's corporate/strategic risk impact table) Operational Risk Register updated YES/NO)
Internal Services	I.C.T.Manager	<p>Pentana - Cloud based – retention only</p> <p>Idocs/Internet/ Intranet and department computers and laptops/Mod Gov Systems listed on other IARs (as applicable)</p> <p>Capita Advances Income Management system</p>	<p>Pentana - BS ISO/IEC 27001:2013 compliant</p> <p>Use of passwords, ISAs, appropriate contract clauses, use of PSN based email services, clear desk policy, departmental contingency planning, data retention, training, monitor screen position, physical security methods (e.g. locked cabinets), visitor passes, anonymisation, pseudonymisation, DPIAs, operational risk assessment, DPA contract provisions, dedicated IP address, up-to-date encryption protocols etc.</p> <p>PCI DSS compliant via SAQ A</p>	As referred to in other IARs (as applicable)	As referred to in other IARs (as applicable)	High Score – 6 Operational Risk Register updated
Internal Services	I.C.T. Manager	Business recovery	See Business Plan			
External Services	Enforcement & Regulatory Services Manager	CCTV – maintenance and administration	A key part of the Council's security setup			

INTERNAL AUDIT (SHARED SERVICE WITH SEVENOAKS DISTRICT COUNCIL) - INFORMATION ASSET REGISTER& RECORD OF PROCESSING ACTIVITY (ROPA)

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIA ¹	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal/ archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held manually and/or on electronic systems (including mobile devices)	Children (under 13) – parental consent normally required
Internal Services	Audit, Risk & Anti-Fraud Manager (Acting Audit Manager)	Audit Working Papers	N/A	6 years from financial year of report issue, plus current year	Common Practice	Secure disposal	Yes - contact details, date of birth, gender, marital status, dependants, next of kin, government, identification numbers, bank account details, payroll information, salary, annual leave and benefit information, performance information, disciplinary and/or grievance information, where applicable, pension and insurance enrolment information, start date and job title, location of employment, education and training, employment records, photograph, other personal details included in a CV or cover letter, business activities, case file information	Public interest task	No	N/A	Paper copy and/or electronically on the audit s: drive and Team Mate	N/A
Internal Services	Audit, Risk & Anti-Fraud Manager (Acting Audit Manager)	Audit Reports, including Management Action Plan	N/A	6 years from financial year of report issue, plus current year	Common Practice	Secure disposal	No	N/A	No	N/A	Paper copy and/or electronically on the audit s: drive and Team Mate	N/A
Internal Services	Audit, Risk & Anti-Fraud Manager (Acting Audit Manager)	Recommendation follow up	N/A	2 years from financial year of report issue, plus current year	Common Practice	Secure disposal.	No	N/A	No	N/A	Paper copy and/or electronically on the audit s: drive and Team Mate	N/A

¹ When building new IT systems for storing or accessing personal data, developing legislation, policy or strategies that have privacy implications, embarking on a data sharing initiative; or using data for new purposes, evaluation or scoring, including profiling, automated decision-making, systematic monitoring of individuals, processing sensitive data, processing data on a large scale, matching or combining datasets, processing data concerning vulnerable data subjects, innovative use or application of technological or organisational solutions, data transfer across borders outside the EU, when the processing in itself "prevents data subjects from exercising a right or using a service or a contract

INTERNAL AUDIT (SHARED SERVICE WITH SEVENOAKS DISTRICT COUNCIL) - INFORMATION ASSET REGISTER& RECORD OF PROCESSING ACTIVITY (ROPA)

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIA	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal/ archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held manually and/or on electronic systems (including mobile devices)	Children (under 13) - parental consent normally required
Internal Services	Audit, Risk & Anti-Fraud Manager (Acting Audit Manager)	Fraud and Irregularity working papers and reports	N/A	6 years from financial year of report issue, plus current year	Common Practice	Secure disposal	Yes Personal contact details, date of birth, gender, marital status, dependants, next of kin, government, identification numbers, bank account details, payroll information, salary, annual leave and benefit information, performance information, disciplinary and/or grievance information, where applicable, pension and insurance enrolment information, start date and job title, location of employment, education and training, employment records, photograph, other personal details included in a CV or cover letter, business activities, case file information, business activities	Substantial public interest (preventing or detecting unlawful acts)	Yes - racial or ethnic origin, health data, offences (including alleged offences), criminal proceedings, outcomes and sentences	Substantial public interest (preventing or detecting unlawful acts)	Paper copy and/or electronically on the audit s: drive and Team Mate	N/A

INTERNAL AUDIT (SHARED SERVICE WITH SEVENOAKS DISTRICT COUNCIL) - INFORMATION ASSET REGISTER& RECORD OF PROCESSING ACTIVITY (ROPA)

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIA	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal/archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held manually and/or on electronic systems (including mobile devices)	Children (under 13) - parental consent normally required
Internal Services	Audit, Risk & Anti-Fraud Manager (Acting Audit Manager)	Selective Invoice Checks	N/A	2 years from financial year of report issue, plus current year	Common Practice	Secure disposal	Yes - contact details, date of birth, gender, marital status, dependants, business activities	Public interest task	No	N/A	Paper copy and/or electronically on the audit s: drive	N/A
Internal Services	Audit, Risk & Anti-Fraud Manager (Acting Audit Manager)	Customer satisfaction questionnaires	N/A	6 years from financial year of report issue, plus current year	Common Practice	Secure disposal	No	N/A	No	N/A	Paper copy and/or electronically on the audit s: drive and Team Mate	N/A
Internal Services	Audit, Risk & Anti-Fraud Manager (Acting Audit Manager)	Whistleblowing	N/A	6 years from financial year of conclusion, plus current year	Common Practice	Secure disposal	Yes - contact details, date of birth, gender, marital status, dependants, next of kin, government, identification numbers, bank account details, payroll information, salary, annual leave and benefit information, performance information, disciplinary and/or grievance information, where applicable, pension and insurance enrolment information, start date and job title, location of employment, education and training, employment records, photograph, other personal details included in a CV or cover letter, business activities, case file information, business activities	Substantial public interest (preventing or detecting unlawful acts)	Yes - racial or ethnic origin, health data, offences (including alleged offences), criminal proceedings, outcomes and sentences	Substantial public interest (preventing or detecting unlawful acts)	Paper copy and/or electronically on the audit s: drive and Team Mate	N/A

INTERNAL AUDIT (SHARED SERVICE WITH SEVENOAKS DISTRICT COUNCIL) - INFORMATION ASSET REGISTER& RECORD OF PROCESSING ACTIVITY (ROPA)

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIA	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal/archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held manually and/or on electronic systems (including mobile devices)	Children (under 13) - parental consent normally required
Internal Services	Audit, Risk & Anti-Fraud Manager (Acting Audit Manager)	Annual Planning Process	N/A	2 years from financial year of issue, plus current year	Common Practice	Secure disposal	No	N/A	No	N/A	Paper copy and/or electronically on the audit s: drive	N/A
Internal Services	Audit, Risk & Anti-Fraud Manager (Acting Audit Manager)	Audit Board and Audit Committee Reports	N/A	Date reported + 6 years	Statutory (for minutes & background information)	Archive electronically	No	N/A	No	N/A	Paper copy and/or electronically on the audit s: drive	N/A
Internal Services	Audit, Risk & Anti-Fraud Manager (Acting Audit Manager)	Minutes of Team Meetings	N/A	2 years from financial year of issue, plus current year	Common Practice	Secure disposal	No	N/A	No	N/A	Paper copy and/or electronically on the audit s: drive	N/A
Internal Services	Audit, Risk & Anti-Fraud Manager (Acting Audit Manager)	Performance Indicators	N/A	2 years from financial year of issue, plus current year	Common Practice	Secure disposal	No	N/A	No	N/A	Electronically on the audit s: drive	N/A
Internal Services	Audit, Risk & Anti-Fraud Manager (Acting Audit Manager)	Operational Risk Registers	N/A	Current year, plus previous year.	Common Practice	Secure disposal	No	N/A	No	N/A	Electronically on the audit s: drive. Current year only on the DBC intranet and the SDC Intranet (Insite)..	N/A
Internal Services	Audit, Risk & Anti-Fraud Manager (Acting Audit Manager)	Strategic Risk Register (for SDC only)	N/A	Current year, plus previous year.	Common Practice	Secure disposal	No	N/A	No	N/A	Electronically on the audit s: drive. Current year only on the SDC Intranet (Insite).	N/A
Internal Services	Audit, Risk & Anti-Fraud Manager (Acting Audit Manager)	General correspondence – emails, letters, memos etc.	N/A	1 year unless considered important for future reference	Common Practice	Secure disposal	Yes – contact details	N/A	No	N/A	Electronically on the audit s: drive	N/A

INTERNAL AUDIT (SHARED SERVICE WITH SEVENOAKS DISTRICT COUNCIL) - INFORMATION ASSET REGISTER& RECORD OF PROCESSING ACTIVITY (ROPA)

TECHNICAL & ORGANISATIONAL SECURITY MEASURES

Strategic Directorate	Information Asset Owner	IT Systems	DPIA	Security Measures
Internal Services	Wolters Kluwer	Team Mate – Maintenance and administration		Password administration - GDPR compliant
Internal Services	Audit, Risk & Anti-Fraud Manager (Acting Audit Manager)	Team Mate- Data input	Yes	Password administration
Internal Services	Policy & Corporate Support Manager	Pentana – maintenance & administration		BS ISO/IEC 27001:2013 compliant
Internal Services	I.C.T. Manager	Department computers and laptops/Internet/ Intranet – maintenance and administration		Password administration, data encryption, implementation of PSN based email services, IT services contingency planning, firewall barriers to hackers, virus protection software, full back-up, rescue disks, security audits, regular testing, assessing and evaluating the effectiveness of technical and organisational measures for ensuring the security of the processing, corporate guidance on organisational/security measure, DPIAs
Internal Services	Audit, Risk & Anti-Fraud Manager (Acting Audit Manager)	Pentana and computers and laptops/Internet/ intranet – testing of data for the purpose of auditing		Use of passwords
Internal Services	Audit, Risk & Anti-Fraud Manager (Acting Audit Manager)	Business recovery		See Business Continuity Plan
External Services	Enforcement & Regulatory Services Manager	CCTV- maintenance and administration		A key part of the Council' s security setup

INTERNAL AUDIT (SHARED SERVICE WITH SEVENOAKS DISTRICT COUNCIL) - INFORMATION ASSET REGISTER& RECORD OF PROCESSING ACTIVITY (ROPA)

CONSENT, OUTSIDE EEA TRANSFERS, DATA PROCESSOR, MARKETING AND RISKS

Categories of data subject	Recipients of personal/sensitive data	If lawful basis for processing is CONSENT -is procedure in place for explicit consent and withdrawal of consent	Outside EEA Transfers YES/NO –if yes – have you checked contractual requirements?	Data Processor (i.e. processing undertaken by a third party under contract) & ISAs	Data Processor Contract Checked - to be varied to incorporate 2018 DPA requirements?	Marketing	Risk category (to be mapped in accordance with the Council's corporate/strategic risk impact table) Operational Risk Register updated YES/NO
Identifiable natural persons such as leaseholders, tenants, complainants, service users, staff etc.	1.Directors, Management and HR 2.Audit Board (DBC) and Audit Committee (SDC) 3.Police	N/A	No	Team Mate – Cloud based – retention only Pentana - Cloud based – retention only Secure Waste Disposal - no processing – Partnership Working Agreement between DBC and SDC ²	Compliant Pentana - BS ISO/IEC 27001:2013 compliant Secure Waste Disposal – confidentiality clause in contract Partnership Agreement – to be reviewed by SDC	N/A	YES – Medium - 4

² The sharing of personal data between data controllers – i.e. where both organisations determine the purposes for which and the manner in which the personal data is processed. Much data sharing takes place in a pre-planned and routine way. As such, it is governed by established rules and procedures.

LAND CHARGES - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIA ¹	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal/archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held manually and/or on electronic systems (including mobile devices)	Children (under 13) – parental consent normally required
Internal Services	Property Information Manager	Procedure/guidance on a range of matters	Applicable if policy or strategies have privacy implications	Supersedes previous version	Common Practice	System Archive Redaction of personal information	No	N/A	No	N/A	Electronic – computer/laptop – intranet-website	N/A
Internal Services	Property Information Manager	Local Land Charges Register - the activity of maintaining local authority information pertaining to land and property including planning related material such as section 106 agreements, charges, plans etc.	N/A	Destroy in accordance with client department instructions	Common Practice	Secure disposal	Yes (identifiable natural persons only) - name, address, contact details	Legal obligation compliance – Land Charge Act 1975	No	N/A	Paper copy &/or electronically in Idox/UNIFORM/TLC	N/A
Internal Services	Property Information Manager	Requisitions for Searches and Enquiries	N/A	Destroy in accordance with client department instructions	Common Practice	Secure disposal	Yes (identifiable natural persons only) – name, address, contact details	Legal obligation compliance – Land Charges Act 1975	No	N/A	Paper copy &/or electronically in Idox/UNIFORM/TLC	N/A
Internal Services	Property Information Manager	Performance Indicators – for that land charges function	N/A	1 year from date of entry on Pentana	Common Practice	Disposal	No	N/A	No	N/A	Electronically on Pentana	N/A
Internal Services	Property Information Manager	Correspondence (general) – emails, letters, memos etc.	N/A	1 year unless considered important for future reference	Common Practice	Secure disposal	Yes (identifiable natural persons only) – name, address, contact details	Public interest task- in accordance with the legislation referred to in this IAR	No	N/A	Paper copy/ electronic/Idox/Uniform	N/A

¹ When building new IT systems for storing or accessing personal data, developing legislation, policy or strategies that have privacy implications, embarking on a data sharing initiative; or using data for new purposes, evaluation or scoring, including profiling, automated decision-making, systematic monitoring of individuals, processing sensitive data, processing data on a large scale, matching or combining datasets, processing data concerning vulnerable data subjects, innovative use or application of technological or organisational solutions, data transfer across borders outside the EU, when the processing in itself “prevents data subjects from exercising a right or using a service or a contract”

LAND CHARGES - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

TECHNICAL & ORGANISATIONAL SECURITY MEASURES

Strategic Directorate	Information Asset Owner	IT Systems	Security Measures
Internal Services	I.C.T. Manager	Computer systems/laptops/Internet – maintenance and administration	Password administration, data encryption, implementation of PSN based email services, IT services contingency planning, firewall barriers to hackers, virus protection software, full back-up, rescue disks, security audits, regular testing, assessing and evaluating the effectiveness of technical and organisational measures for ensuring the security of the processing, corporate guidance on organisational/security measure, DPIAs
Internal Services	Policy & Corporate Support Manager	Pentana – maintenance & administration	BS ISO/IEC 27001:2013 compliant
Internal Services	Property Services Manager	Pentana – input of land charges data	Password administration
Internal Services	Property Services Manager in consultation with IT Services support	Disaster recovery	See Business Continuity Plan
External Services	Enforcement & Regulatory Services Manager	CCTV – maintenance and administration	A key part of the Council's security setup

CONSENT, OUTSIDE EEA TRANSFERS, DATA PROCESSOR, MARKETING AND RISKS

Categories of data subjects	Recipients of personal data	If lawful basis for processing is CONSENT -is procedure in place for explicit consent and withdrawal of consent	Outside EEA Transfers YES/NO –if yes - check contractual requirements	Data Processor (i.e. processing undertaken by a third party under contract)	Data Processor Contract Checked - to be varied to incorporate 2018 DPA requirements	Marketing	Risk category (to be mapped in accordance with the Council's corporate/strategic risk impact table) Operational Risk Register updated – YES/NO
Identifiable natural persons such as service users etc.	National Land Information Service	N/A	N/A	Secure Waste Disposal - no processing	Secure Waste Disposal – confidentiality clause in contract	N/A	Low score – 2 No
				Local Land Charges Direct		N/A	

LEGAL SERVICES - INFORMATION ASSET REGISTER& RECORD OF PROCESSING ACTIVITY (ROPA)

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIA	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal/archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held manually and/or on electronic systems (including mobile devices)	Children (under 13) – parental consent normally required
Internal Services	Head of Legal Services	Procedure/guidance on a range of legal & constitutional matters	Applicable if policy or strategies have privacy implications	Supersedes previous version	Common Practice	Archive	No	N/A	No	N/A	Electronic – Council computer/laptop – intranet-website	N/A
Internal Services	Head of Legal Services	Property matters – case file material – sales, purchases, leases, mortgages, easements, covenants etc.	N/A	6 years from date of closure (excluding completed lease, licences etc. & other documents considered important for future reference)	Common Practice	Secure disposal	Yes (identifiable natural persons only) - name, address, contact details	Performance of a contract/taking steps preparatory to such a contract	No	N/A	Paper copy &/or electronically in Idocs	N/A
Internal Services	Head of Legal Services	Deeds – pre-registration title documents, leases, HM Land Registry official copies, section 106 agreements, unilateral undertakings, contracts etc.	N/A	Permanent	Common Practice	Archive	Yes (identifiable natural persons only) – name, address, contact details	Performance of a contract/taking steps preparatory to such a contract	No	N/A	Paper copy in Deed Room &/or electronically in Idocs	N/A
Internal Services	Head of Legal Services	Contract files - case file material – tenders, specifications, draft contracts etc.	N/A	6 years if under hand or 12 years if under seal (excluding concluded contracts & other documents considered important for future reference)	Common Practice	Secure disposal	Yes (identifiable natural persons only) – name, address, contact details	Performance of a contract/taking steps preparatory to such a contract	No	N/A	Paper copy in Deed Room &/or electronically in Idocs	N/A

LEGAL SERVICES - INFORMATION ASSET REGISTER& RECORD OF PROCESSING ACTIVITY (ROPA)

Strategic Directorate	Information Asset Owner(s)	Record/Information Description	DPIA	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal/archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held manually and/or on electronic systems (including mobile devices)	Children (under 13) – parental consent normally required
Internal Services	Head of Legal Services	Court/Tribunals judgments/orders	N/A	6 years from date of file closure unless considered important for future reference	Common Practice	Secure disposal	Yes (identifiable natural persons only) – name, address, contact details	Legal claims or performance of a task carried out in the public interest	Yes – criminal offences	Substantial public interest	Electronically in Idocs	N/A
Internal Services	Head of Legal Services	Orders - byelaws, PSPOs etc.	N/A	Permanent	Common Practice	Archive	No	N/A	No	N/A	Paper copy in Deed Room &/or electronically (Idocs/intranet /website)	N/A
Internal Services	Head of Legal Services	Correspondence (general) – emails, letters, memos etc.	N/A	1 year unless considered important for future reference	Common Practice	Secure disposal	Yes (identifiable natural persons only) – name, address, contact details	Public interest (subsidiary activity)	No	N/A	Paper copy/ Electronic/ Idocs	N/A
Internal Services	Head of Legal Services	Town & Country Planning - case file material – instructions, section 106 agreements, unilateral undertakings, enforcement notices, advice etc.	N/A	6 years from date of closure (excluding completed notices, section 106 agreements, unilateral undertakings & other documents considered important for future reference)	Common Practice	Secure disposal	Yes (identifiable natural persons only) – name, address, contact details	As applicable - performance of a contract or performance of a task carried out in the public interest Legal compliance – Town & Country Planning Act 1990	Yes – health data, criminal offences etc.	Substantial public interest – Town and Country Planning Act 1990	Paper copy &/or electronically in Idocs	N/A

LEGAL SERVICES - INFORMATION ASSET REGISTER& RECORD OF PROCESSING ACTIVITY (ROPA)

Strategic Directorate	Information Asset Owner(s)	Record/Information Description	DPIA	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal/archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held manually and/or on electronic systems (including mobile devices)	Children (under 13) - parental consent normally required
Internal Services	Head of Legal Services	Litigation – civil/criminal (taking or defending proceedings) – case file material – instructions, court orders etc.	N/A	6 years from date of closure (excluding orders/judgments & other documents considered important for future reference)	Common Practice	Secure disposal	Yes (identifiable natural persons only) – name, address, contact details	Legal obligation compliance	Yes – racial or ethnic origin, state of health, offences (including alleged offences) criminal proceedings outcomes and sentences (as applicable)	Substantial public interest - Legal claims/legal proceedings	Paper copy &/or electronically in Idocs	N/A
Internal Services	Head of Legal Services	Data protection – subject access requests to Legal Services only – requests received and responses including Stage Two reviews on all SARs and ICO communications	N/A	2 years from date of closure	Common Practice	Secure disposal	Yes – name, address, contact details	Legal obligation compliance – Data Protection Act 2018	Yes - racial or ethnic origin, state of health (as applicable)	Legal obligation compliance – Data Protection Act 2018	Paper copy &/or electronically in Idocs Anonymised - electronically on SAR Schedule on intranet	N/A
Internal Services	Head of Legal Services	Freedom of Information – non-routine requests received and decisions including Stage Two reviews and ICO communications	N/A	2 years from date of closure Or Incoming emails filed in Outlook – 2 years	Common Practice	Secure disposal	Yes – name, address, contact details-	Legal obligation compliance – FOIA 2000	No	N/A	Paper copy &/or electronically on Pentana (anonymised)	N/A
Internal Services	Head of Legal Services	Performance Indicators – for the legal services function	N/A	If a performance indicator is no longer required, deactivate and archive the indicator and delete from Pentana after 1 year	Common Practice	Disposal	No	N/A	No	N/A	(Anonymised) Electronically on Pentana	N/A
Internal services	Head of Legal Services	Constitution	N/A	Supersedes previous version	Common Practice	Archive	No	N/A	No	N/A	Electronic-computer, intranet, internet	N/A

LEGAL SERVICES - INFORMATION ASSET REGISTER& RECORD OF PROCESSING ACTIVITY (ROPA)

Strategic Directorate	Information Asset Owner(s)	Record/Information Description	DPIA	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal/archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held manually and/or on electronic systems (including mobile devices)	Children (under 13) - parental consent normally required
Internal Services	Head of legal Services	Standing Orders (Procedural) and Contracts Standing Orders	N/A	Supersedes previous version	Common Practice	Archive	N/A	No	No	N/A	Electronic-computer, intranet, internet	N/A
Internal/ External Services	Service Managers	Subject Access Requests – central register of SARs	N/A	2 years from date of closure	Common Practice	Secure Disposal	N/A	No	No	N/A	Electronic	N/A

TECHNICAL & ORGANISATIONAL SECURITY MEASURES

Strategic Directorate	Information Asset Owner	IT Systems	Security Measures
Internal Services	I.C.T. Manager	Idocs and department computers and laptops/internet /intranet – maintenance and administration	Password administration, data encryption, implementation of PSN based email services, IT services contingency planning, firewall barriers to hackers, virus protection software, full back-up, rescue disks, security audits, regular testing, assessing and evaluating the effectiveness of technical and organisational measures for ensuring the security of the processing, corporate guidance on organisational/security measure, DPIAs, DPA contract provisions
Internal Services	Policy & Corporate Support Manager	Pentana – maintenance and administration	BS ISO/IEC 27001:2013 compliant
Internal Services	Head of Legal Services	Idocs/Pentana/Intranet /Internet and computers and laptops – input of data – the legal services function	Use of passwords, ISAs, appropriate contract clauses, use of PSN based email services, clear desk policy, departmental contingency planning, data retention, training, monitor screen position, physical security methods (e.g. locked cabinets), visitor passes, anonymisation, pseudonymisation, DPIAs, operational risk assessment, DPA contract provisions Dedicated IP address, up-to-date encryption protocols etc.
External Services	Enforcement & Regulatory Services Manager	CCTV – maintenance and administration	A key part of the Council's security setup
Internal Services	Head of Legal Services	Disaster recovery	See Business Continuity Plan

LEGAL SERVICES - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

CONSENT, OUTSIDE EEA TRANSFERS, DATA PROCESSOR, MARKETING AND RISKS

Categories of data subjects	Recipients of personal/sensitive data	If lawful basis for processing is CONSENT -is procedure in place for explicit consent and withdrawal of consent	Outside EEA Transfers YES/NO –if yes - check contractual requirements	Data Processor (i.e. processing undertaken by a third party under contract) & ISAs	Data Processor Contract Checked - to be varied to incorporate 2018 DPA requirements	Marketing	Profiling	Risk category (to be mapped in accordance with the Council's corporate/strategic risk impact table) Operational Risk Register updated – YES/NO
Identifiable natural persons such as leaseholders, tenants, complainants, applicants, employees, service users etc.	1.Council department(s) 2.Courts/tribunals etc. 3.Ombudsman 4.Councillors 5.H M Land Registry 6.Government agencies	N/A	N/A	Pentana – Cloud based – retention only Secure Waste Disposal - no processing SDC bulk printing – no processing Kent & Medway ISA	Pentana - BS ISO/IEC 27001:2013 compliant Secure Waste Disposal – confidentiality clause in contract SDC bulk printing SLA –includes confidentiality requirements K&MISA - compliant	N/A	N/A	YES – low - 2

MANAGEMENT TEAM – INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

Information Asset Owner	Record/Information Description	DPIA	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal/archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held manually and/or on electronic systems (including mobile devices)	Children (under 13) – parental consent normally required
Relevant Director & PA	Directors' General Correspondence – letters, memos, emails, reports etc.	N/A	1 year unless considered important for future reference	Common Practice	Secure disposal	Yes - identifiable natural persons only) - contact details such as name, title, address, telephone number & email address	Public interest task - see departmental IARs for lawful bases	No	N/A	Electronic and paper copy	No
Managing Director & PA (for minuting and retention only)	Minutes of MT meetings	N/A	1 year	Common Practice	Secure disposal	No	N/A	No	N/A	Electronic and paper copy	No
Managing Director & PA (for minuting and retention only)	Minutes of SMT meetings	N/A	1 year	Common Practice	Secure disposal	No	N/A	No	N/A	Electronic	No
Relevant Heads of Service & PA to Strategic Director (External Services) for logging & monitoring purposes only)	MP's Enquiries – complaints & responses	N/A	1 year from date of closure	Common Practice	Secure disposal	Yes - identifiable natural persons only) - contact details such as name, title, address, telephone number & email address, dependents, marital status, gender etc.	Public interest task - see departmental IARs for lawful bases	Yes – health, housing benefits/council tax, legal proceedings data etc.	Substantial public interest – disclosure to elected representative –para.19 Schedule 1 of DPA 2017-2019	Electronic on Pentana and paper copy	No
Managing Director & PA (for logging purposes only)r	Club Together Community Grants – processing of applications from individuals, charities/organisations etc.	N/A	2 years from date of grant	Common Practice	Secure disposal	Yes - identifiable natural persons only) - contact details such as name, title, address, telephone number, email address & bank details etc.	Public interest task pursuant to Section 137 LGA 1972 Section 19(3) of the Local Government (Miscellaneous Provisions) Act 1976 Section 2(1) LGA 2000 (as applicable)	No	N/A	Electronic and paper copy	No

MANAGEMENT TEAM – INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

Information Asset Owner	Record/Information Description	DPIA	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal/archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held manually and/or on electronic systems (including mobile devices)	Children (under 13) – parental consent normally required
Managing Director & PA (for logging purposes only)	Hospitality Register – Directors' entries	N/A	1 year	Common Practice	Secure disposal	Yes - identifiable natural persons only) - offer made to/received by/ details of gift/ hospitality/ individual/organisation making offer/event/circumstances of offer/date received/accepted/ refused	Legal obligation compliance pursuant to Section 117 LGA 1972	No	N/A	Electronic and paper copy	No
Relevant Directors and PAs (for minuting and retention only)	Directors' Management Meetings - minutes	N/A	1 year	Common Practice	Secure disposal	No	N/A	No	N/A	Electronic	No
Strategic Director (Internal Services) & PA (for minuting & retention only)	Minutes of Corporate Wellbeing Group meetings	N/A	1 year	Common Practice	Secure disposal	No	N/A	No	N/A	Electronic	No
Member Services Manager & PAs (for administration purposes only)	Remembrance Sunday – invitations, labels, minutes and agendas	N/A	Supersedes previous version	Common Practice	Secure disposal	Yes - (identifiable natural persons only) - contact details such as name, title, address, telephone number & email address etc.	Public interest task pursuant Localism Act 2011 Local Government (Religious etc. Observances) Act 2015	No	N/A	Electronic	No
Financial Services Manager & PA to Strategic Director (External Services) (for invoice raising only) -	Procurement – hard copy invoices	N/A	1 financial year from date raised	Common Practice	Secure disposal	Yes – (identifiable natural persons only) - contact details such as name, title, address, telephone number & email address etc.	Public interest task pursuant to: Section 135 LGA 1972 Public Contracts Regulations 2015	No	N/A	Paper copies	No

MANAGEMENT TEAM – INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

Information Asset Owner	Record/Information Description	DPIA	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal/archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held manually and/or on electronic systems (including mobile devices)	Children (under 13) – parental consent normally required
Strategic Director (Internal Services)	Strategic Risk Register	N/A	Supersedes previous version	Common Practice	Secure disposal	No	N/A	No	N/A	Electronic	No
Monitoring Officer & PA to Strategic Director (Internal Services) (for logging entries electronically only)	Disclosable Pecuniary Interests' Register – members'(borough & parishes) declaration of interests	N/A	Permanent for all current members – destroy 18 months after ceasing to be a councillor/co-opted member	Common Practice	Secure disposal	Yes – as prescribed by law	Legal obligation compliance pursuant to Section 30 Localism Act 2011	No	N/A	Electronic and paper copies	No
Monitoring Officer & PA to Strategic Director (Internal Services) (for logging entries electronically only)	Voluntary Interests' Register - members' declaration of interests	N/A	Permanent for all current members – destroy 18 months after ceasing to be a councillor/co-opted member	Common Practice	Secure disposal	Yes - (identifiable natural persons only) - contact details and interest entries	Public interest task- Section 27(1) Localism Act 2011	No	N/A	Electronic and paper copies	No
PA to the Managing Director (for administrative support and retention only)	Events & VIP visits – invitations. labels etc.(Council related matters e.g. hosting and event)	N/A	1 year	Common Practice	Secure disposal	Yes - (identifiable natural persons only) - contact details such as name, title, address, telephone number & email address	Public interest task - Section 1 Localism Act 2011	No	N/A	Electronic and paper copy	No

MANAGEMENT TEAM – INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

Information Asset Owner	Record/Information Description	DPIA	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal/archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held manually and/or on electronic systems (including mobile devices)	Children (under 13) – parental consent normally required
PA to the Managing Director (for administrative support and retention only)	– Dartfordian Awards – register of awards	N/A	Superseded by previous version	Common Practice	As superseded	Yes - (identifiable natural persons only) - contact details such as name, title, address, telephone number & email address	Public interest task – Section 1 Localism Act 2011	No	N/A	Electronic and paper copy	No
PA to the Strategic Director (Internal Services)(for administrative support and retention only	The conduct of Mayoral business by the incumbent Mayor - general correspondence , events, VIP visits etc.– letters, emails, invites & responses but excluding charitable and fund raising issues promoted by the Mayor	N/A	Until appointment of successor	Common Practice	Secure disposal	Yes - (identifiable natural persons only) - contact details such as name, title, address, telephone number & email address	Public interest task – Section 1 Localism Act 2011	No	N/A	Electronic and paper copy	No
External Services	Monitoring Officer Section 5 reports to the GAC	N/A	Date reported + 6 years	Statutory (for minutes & background information)	Secure disposal of paper copies Archive electronically (minutes & background information)	Yes - (identifiable natural persons only) - contact details such as name, title etc.	Public interest task – Local Government & Housing Act 1989	Yes- alleged offence(s)	Substantial public interest task - Local Government & Housing Act 1989	Electronic & paper copy	No

MANAGEMENT TEAM – INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

Information Asset Owner	Record/Information Description	DPIA	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal/archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held manually and/or on electronic systems (including mobile devices)	Children (under 18) -
Strategic Director (External Services) & PA (for logging and monitoring purposes only)	Safeguarding Referrals (children & adults at risk) - emails & schedule of referrals – central log	Yes	2 years from date of entry	Common Practice	Secure Disposal	Yes – (identifiable natural persons only) - name , address, contact details	Public interest task/legal obligation – Children Act 2004/Care Act 2014 Statutory Guidance - Working Together to Safeguard Children Care & Support Statutory Guidance	Yes – health data, offences (including alleged offences)	Substantial public interest task/legal obligation – Children Act 2004/Care Act 2014 - Working Together to Safeguard Children Care & Support Statutory Guidance	Paper copy &/or electronic	Yes

MANAGEMENT TEAM – INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

TECHNICAL & ORGANISATIONAL SECURITY MEASURES

Strategic Directorate	Information Asset Owner	IT Systems	Security Measures
Internal Services	I.C.T. Manager	Computer systems/Intranet/Internet – maintenance and administration	Password administration, data encryption, implementation of PSN based email services, IT services contingency planning, firewall barriers to hackers, virus protection software, full back-up, rescue disks, security audits, regular testing, assessing and evaluating the effectiveness of technical and organisational measures for ensuring the security of the processing, corporate guidance on organisational/security measure, DPIAs
Management Team	Directors & Management PAs	Computer systems/Intranet/Internet –input of data	Password administration
Management Team	PA to Strategic Director (External Services)	Pentana – input of MPs enquiries	Password administration
Internal Services	Policy & Corporate Support Manager	Pentana – maintenance & administration	BS ISO/IEC 27001:2013 compliant
External Services	Enforcement & Regulatory Services Manager	CCTV - maintenance & administration	A key part of the Council's security setup

MANAGEMENT TEAM – INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

CONSENT, OUTSIDE EEA TRANSFERS, DATA PROCESSOR, MARKETING AND RISKS

Categories of data subject	Recipients of personal/sensitive data (as applicable)	If lawful basis for processing is CONSENT -is procedure in place for explicit consent and withdrawal of consent	Outside EEA Transfers if yes – have you checked contractual requirements?	Data Processor (i.e. processing undertaken by a third party under contract) & ISAs	Data Processor Contract Checked - to be varied to incorporate 2018 DPA requirements	Marketing	Portability	Risk category (to be mapped in accordance with the Council's corporate/strategic risk impact table) Operational Risk Register updated
Identifiable natural persons such as leaseholders, tenants, complainants, applicants, service users etc.	1.Council department(s) 2.Ombudsman Member of Parliament 3.Councillors 4.Partners e.g. KCC Children's/Adults' Services	N/A	N/A	Pentana – Cloud based – retention only Secure Waste Disposal - no processing SDC bulk printing – no processing Kent & Medway Information Sharing Agreement	Pentana - BS ISO/IEC 27001:2013 compliant Secure Waste Disposal – confidentiality clause in contract SDC bulk printing SLA – confidentiality clause K&MISA – compliant	N/A	N/A	Low - 2

MEMBER CODE OF CONDUCT COMPLAINTS (MONITORING OFFICER) - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIA	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal/archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held manually and/or on electronic systems (including mobile devices)	Children (under 13) – parental consent normally required
External Services	Deputy Monitoring Officer	Arrangements for dealing with Code of Conduct Complaints under Localism Act 2011	N/A	Supersedes preceding version	Common Practice	Archive	No	N/A	No	N/A	Electronic	No
External Services	Monitoring Officer	Initial assessment – case file material other than record of complaint & decision	N/A	Current year + 1 year after case closed Or Email (Outlook) -3 years	Common Practice	Secure disposal	Yes – (identifiable natural persons only) - contact details such as name, title, address, telephone number & email address	Legal obligation compliance – Localism Act 2011	Yes – alleged offence(s)	Legal compliance obligation – Localism Act 2011	Paper copy &/or electronically	No
External Services	Monitoring Officer	Informal resolution/mediation – case file material other than record of complaint & decision	N/A	Current year + 1 year after case closed Or Email (Outlook) – 3 years	Common Practice	Secure disposal	Yes - identifiable natural persons only) - contact details such as name, title, address, telephone number & email address	Legal obligation compliance – Localism Act 2011	Yes – alleged offence(s)	Legal compliance obligation – Localism Act 2011	Paper copy &/or electronically	No
External Services	Monitoring Officer	Investigations- case file material other than record of complaints & decisions	N/A	Current year + 1 year after case closed unless exceptional circumstances require longer retention e.g. pending court case Or Email (Outlook) -3 years	Common Practice	Secure disposal	Yes - identifiable natural persons only) - contact details such as name, title, address, telephone number & email address	Legal obligation compliance - Localism Act 2011	Yes- alleged offence(s)	Legal compliance obligation – Localism Act 2011	Paper copy &/or electronically	No
External Services	Monitoring Officer	Records of complaints & decisions	N/A	Current year after case closed + 4 years Or Email (Outlook) – 3 years	Common Practice	Secure disposal	Yes - identifiable natural persons only) - contact details such as name, title, address, telephone number & email address	Legal obligation compliance – Localism Act 2011	Yes- alleged offence(s)	Legal compliance obligation – Localism Act 2011	Paper copy &/or electronic	N/A

MEMBER CODE OF CONDUCT COMPLAINTS (MONITORING OFFICER) - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIA	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal/archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held manually and/or on electronic systems (including mobile devices)	Children (under 13) - parental consent normally required
External Services	Monitoring Officer	DPI referrals to Kent Police – case file material	N/A	Current year + 1 year after case closed unless exceptional circumstances require longer retention e.g. pending court case Or Email (Outlook) – 3 years	Common Practice	Secure disposal	Yes - identifiable natural persons only) - contact details such as name, title, address, telephone number & email address	Legal obligation compliance – Localism Act 2011	Yes- alleged offence(s)	Legal compliance obligation – Localism Act 2011	Paper copy &/or electronic	N/A
Internal Services	Member Services Manager	Hearing Panel – report and investigation material etc.	N/A	Date reported + 6 years	Statutory (for minutes & background information)	Secure disposal of paper records Archive electronically (minutes & background information)	Yes	Legal obligation compliance – LGA 1972 Localism Act 2011	No	N/A	Electronically on Mod Gov	N/A
Internal Services	Member Services Manager	Anonymised statistical information on complaints received and outcomes reported to Audit Board	N/A	Date reported + 6 years	Statutory (for minutes & background information)	Disposal of paper copies Archive electronically (minutes & background information)	No	N/A	No	N/A	Electronically on Mod Gov	N/A
Internal Services	Member Services Manager	Collection of anonymised data of complainants' diversity information - reported to the Audit Board	N/A	Date reported + 6 years	Statutory (for minutes & background information)	Secure disposal of paper copies Archive electronically (minutes & background information)	No - anonymised	N/A	No - anonymised	N/A	Paper copy &/or electronically on Mod Gov	N/A
External Services	Monitoring Officer & PA to Strategic Director (Internal Services) (for logging entries electronically only)	Disclosable Pecuniary Interests' Register – members' (borough & parish) declaration of interests	N/A	Permanent for all current members – destroy 18 months after ceasing to be a councillor/co-opted member	Common Practice	Secure disposal	Yes – as prescribed by law	Legal obligation compliance pursuant to Section 30 Localism Act 2011	No	N/A	Electronic and paper copies – Internet entries	No

MEMBER CODE OF CONDUCT COMPLAINTS (MONITORING OFFICER) - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

TECHNICAL & ORGANISATIONAL SECURITY MEASURES

Strategic Directorate	Information Asset Owner	IT Systems	Security Measures
Internal Services	I.C.T. Manager	Computer systems/Intranet/Internet – maintenance and administration	Password administration, data encryption, implementation of PSN based email services, IT services contingency planning, firewall barriers to hackers, virus protection software, full back-up, rescue disks, security audits, regular testing, assessing and evaluating the effectiveness of technical and organisational measures for ensuring the security of the processing, corporate guidance on organisational/security measure, DPIAs
External Services	Monitoring Officer	Computer systems/Intranet/Internet –input of data	Password administration
External Services	Enforcement & Regulatory Services Manager	CCTV - maintenance & administration	A key part of the Council's security setup

CONSENT, OUTSIDE EEA TRANSFERS, DATA PROCESSOR, MARKETING AND RISKS

Categories of data subject	Recipients of personal/sensitive data (as applicable)	If lawful basis for processing is CONSENT -is procedure in place for explicit consent and withdrawal of consent	Outside EEA Transfers YES/NO –if yes – have you checked contractual requirements?	Data Processor (i.e. processing undertaken by a third party under contract) & ISAs	Data Processor Contract Checked - to be varied to incorporate 2018 DPA requirements	Marketing	Portability	Risk category (to be mapped in accordance with the Council's corporate/strategic risk impact table) Operational Risk Register updated YES/NO
Identifiable natural persons such complainants etc.	1.Independent Person 2.Kent Police (where applicable) 3.Investigator (where applicable) 4.Courts/tribunals 5.Audit Board	N/A	N/A	Pentana – Cloud based – retention only Secure Waste Disposal - no processing SDC bulk printing – no processing	Pentana - BS ISO/IEC 27001:2013 compliant Secure Waste Disposal – confidentiality clause in contract SDC bulk printing SLA – confidentiality clause	N/A	N/A	Low - 2

PARKS & OPEN SPACES - INFORMATION ASSET REGISTER& RECORD OF PROCESSING ACTIVITY (ROPA)

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIA ¹	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal/archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held manually and/or on electronic systems (including mobile devices)	Children (under 13) – parental consent normally required
External Services	Waste & Parks Manager	Procedure/guidance - on a range of matters		Supersedes previous version	Common Practice	Superseded	No	N/A	No	N/A	Electronic	N/A
External Services	Waste & Parks Manager	Allotments - tenancy agreements and correspondence	N/A	1 year from end of tenancy agreement	Common Practice	Secure Disposal	Yes - (identifiable natural persons only) - name, address, contact details	Public interest task pursuant to Allotments Acts 1922-1950	No	N/A	Electronic	N/A
External Services	Waste & Parks Manager	Grounds Maintenance successful tender - case file material – tender, contract and ancillary correspondence etc.-	N/A	6 year for contracts under hand 12 years for contracts under seal	Common Practice	Secure Disposal	Yes - identifiable natural persons only)- name, address, contact details, financial data	Public interest task pursuant to: Section 10 Open Spaces Act 1906 Section 21 Housing Act 1985	No	N/A	Paper copy &/or electronic - Idox	N/A
External Services	Waste & Parks Manager	Grounds Maintenance contract management – correspondence etc.	N/A	6 year for contracts under hand plus 1 year 12 years for contracts under seal plus 1 year	Common Practice	Secure Disposal	Yes (identifiable natural persons only) - name, address, contact details, financial data	Public interest task- pursuant to: Section 10 Open Spaces Act 1906 Section 21 Housing Act 1985	No	N/A	Paper copy &/or electronic - Idox	N/A

¹ When building new IT systems for storing or accessing personal data, developing legislation, policy or strategies that have privacy implications, embarking on a data sharing initiative; or using data for new purposes, evaluation or scoring, including profiling, automated decision-making, systematic monitoring of individuals, processing sensitive data, processing data on a large scale, matching or combining datasets, processing data concerning vulnerable data subjects, innovative use or application of technological or organisational solutions, data transfer across borders outside the EU, when the processing in itself “prevents data subjects from exercising a right or using a service or a contract

PARKS & OPEN SPACES - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIA	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal/archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held manually and/or on electronic systems (including mobile devices)	Children (under 13) - parental consent normally required
External Services	Waste & Parks Manager	Playgrounds - successful tender - case file material – tender, contracts, inspection reports and ancillary correspondence etc.	N/A	21 years following inspection in case of insurance claim relating to health & safety or accidents	Statutory	Secure Disposal	Yes - (identifiable natural persons only)- name, address, contact details, financial data	Public interest task pursuant to Section 19 Local Government (Miscellaneous Provisions) Act 1976	Yes – health data (for insurance claims)	Substantial public interest task/legal claims	Paper copy &/or electronic - Idox	YES – with parental consent
External Services	Waste & Parks Manager	Friends of Groups (chaired by Councillors) - meeting agendas, minutes and distribution databases	N/A	Supersedes previous version	Common Practice	Secure Disposal	Yes - (identifiable natural persons only) – name, address, contact details	Public interest task – Open Spaces Act 1906	No	N/A	Electronic	N/A
External Services	Waste & Parks Manager	Football Pitches - team contact details and signed T & C's	N/A	1 year from date of licence	Common Practice	Secure Disposal	Yes - (identifiable natural persons only) – name, address, contact details	Public interest task pursuant to Section 19 Local Government (Miscellaneous Provisions) Act 1976	No	N/A	Electronic	N/A
External Services	Waste & Parks Manager	Security successful tender - case file material – tender, contracts, inspection reports and ancillary correspondence etc. -	N/A	6 years for contracts under hand 12 years for contracts under seal	Common Practice	Secure Disposal	Yes - (identifiable natural persons only) – name, address, contact details, financial data	Public interest task – pursuant to Section 10 Open Spaces Act 1906	No	N/A	Paper copy &/or electronic - Idox	N/A
External Services	Waste & Parks Manager	Graffiti - successful tender - case file material – tender, contract and ancillary correspondence etc.	N/A	For duration of contract	Common Practice	Secure Disposal	No	N/A	No	N/A	Paper copy &/or electronic - Idox	N/A

PARKS & OPEN SPACES - INFORMATION ASSET REGISTER& RECORD OF PROCESSING ACTIVITY (ROPA)

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIA	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal/archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held manually and/or on electronic systems (including mobile devices)	Children (under 13) - parental consent normally required
External Services	Waste & Parks Manager	Public Conveniences - successful tender - case file material – tender, contract and ancillary correspondence etc.	N/A	For duration of contract	Common Practice	Secure Disposal	Yes - (identifiable natural persons only) – name, address, contact details, financial data	Public interest task pursuant to Section 87 Public Health Act 1936	No	N/A	Paper copy &/or electronic - Idox	N/A
External Services	Waste & Parks Manager	Trees' Maintenance – individual orders to tree surgeons etc.	N/A	Permanent	Common Practice	Archive	Yes - (identifiable natural persons only) – name, address, contact details, financial data	Public interest task pursuant to Section 23 Local Government (Miscellaneous Provisions) Act 1976	No	N/A	Electronic	N/A
External Services	Waste & Parks Manager	Bedding Plants - successful tender - case file material – tender, contract and ancillary correspondence etc.	N/A	For duration of contract	Common Practice	Secure Disposal	Yes - (identifiable natural persons only) – name, address, contact details, financial data	Public interest task pursuant to Section 10 Open Spaces Act 1906	No	N/A	Paper copy &/or electronic - Idox	N/A
External Services	Waste & Parks Manager	Hanging Baskets - successful tender - case file material – tender, contract and ancillary correspondence etc.	N/A	For duration of contract	Common Practice	Secure Disposal	Yes - (identifiable natural persons only) – name, address, contact details, financial data	Public interest task pursuant to Section 10 Open Spaces Act 1906	No	N/A	Paper copy &/or electronic - in Idox	N/A

PARKS & OPEN SPACES - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIA	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal/archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held manually and/or on electronic systems (including mobile devices)	Children (under 13) - parental consent normally required
External Services	Waste & Parks Manager	Café in the Park-successful tender - case file material – tender, contract and ancillary correspondence etc.	N/A	6 years for contracts under hand 12 years for contracts under seal	Common Practice	Disposal	Yes - (identifiable natural persons only) – name, address, contact details, financial data	Public interest task pursuant to Section 19 Local Government (Miscellaneous Provisions) Act 1976	No	N/A	Paper copy &/or electronic - Idox	N/A
External Services	Waste & Parks Manager	Complaints – case file management – correspondence etc.	N/A	2 years from date of case closure unless exceptional circumstances require longer retention e.g. pending court case	Common Practice	Secure Disposal	Yes - (identifiable natural persons only) – name, address, contact details	Public interest task pursuant to the legislation referred to in this IAR (as applicable)	No	N/A	Electronic	N/A
External Services	Waste & Parks Manager	Performance Indicators - statistical information (anonymised)	N/A	If a performance indicator is no longer required, deactivate and archive the indicator and delete from Pentana after 1 year	Common Practice	Disposal	No	N/A	No	N/A	Electronic - Pentana	N/A
External Services	Waste & Parks Manager	Correspondence - (general) – emails, letters, memos etc.	N/A	1 year unless considered important for future reference	Common Practice	Secure Disposal	Yes - (identifiable natural persons only) – name, address, contact details	Public interest task pursuant to the legislation referred to in this IAR (as applicable)	No	N/A	Paper copy &/or electronic - Idox	N/A
External Services	Waste & Parks Manager	Routine Service Requests – correspondence etc.	N/A	3 years from date of closure unless exceptional circumstances require longer retention e.g. pending court case	Common Practice	Secure Disposal	Yes - (identifiable natural persons only) – name, address, contact details	Public interest task pursuant to the legislation referred to in this IAR (as applicable)	No	N/A	Paper copy &/or electronic - Idox	N/A

PARKS & OPEN SPACES - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIA	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal/ archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held manually and/or on electronic systems (including mobile devices)	Children (under 18)
External Services	Waste & Parks Manager	Safeguarding Referrals (children & adults at risk)	Yes	Delete immediately following confirmation from KCC	Common Practice	Secure Disposal	Yes - (identifiable natural persons only) – name, address, contact details	Public interest task/legal obligation – Children Act 2004/Care Act 2014 Statutory Guidance - Working Together to Safeguard Children Children Care & Support Statutory Guidance	Yes- health data, offences (including alleged offences)	Substantial public interest task/legal obligation Children Act 2004/Care Act 2014 Statutory Guidance - Working Together to Safeguard Children Children Care & Support Statutory Guidance	Paper copy &/or electronic	Yes

PARKS & OPEN SPACES - INFORMATION ASSET REGISTER& RECORD OF PROCESSING ACTIVITY (ROPA)

TECHNICAL & ORGANISATIONAL SECURITY MEASURES

Strategic Directorate	Information Asset Owner	IT Systems	Security Measures
Internal Services	I.C.T. Manager	Idox/UNIFORM/Academy and department computers and laptops/Internet/Intranet – maintenance and administration	Password administration, data encryption, implementation of PSN based email services, IT services contingency planning, firewall barriers to hackers, virus protection software, full back-up, rescue disks, security audits, regular testing, assessing and evaluating the effectiveness of technical and organisational measures for ensuring the security of the processing, corporate guidance on organisational/security measure, DPIAs
Internal Services	Policy & Corporate Support Manager	Pentana – maintenance & administration	BS ISO/IEC 27001:2013 compliant
External Services	Waste & Parks Manager	Idox/UNIFORM/Pentana and computers and laptops/Internet/Intranet – input of data – the parks and open spaces function	Use of passwords
Internal Services	Customer Services Manager	On-line payments (hosted by Capita)	PCIDSS compliant
External Services	Waste and Parks Manager	Disaster recovery	See Business Continuity Plan
External Services	Enforcement & Regulatory Services Manager	CCTV -administration and maintenance	A key part of the Council's security set up

PARKS & OPEN SPACES - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

CONSENT, OUTSIDE EEA TRANSFERS, DATA PROCESSOR, MARKETING AND RISKS

Categories of data subject	Recipients of personal data	If lawful basis for processing is CONSENT -is procedure in place for explicit consent and withdrawal of consent	Outside EEA Transfers if yes – have you checked contractual requirements?	Data Processor (i.e. processing undertaken by a third party under contract) & ISAs	Data Processor Contract Checked - to be varied to incorporate 2018 DPA requirements	Marketing	Portability	Risk category (to be mapped in accordance with the Council's corporate/strategic risk impact table) Operational Risk Register updated YES
Identifiable natural persons such as leaseholders, tenants, complainants, applicants, service users etc.	1.Council department(s) 2.Ombudsman 3.Local authorities 4.Parish Councils 5.KCC	N/A	N/A	Pentana – Cloud based – retention only Continental Landscapes Ltd - Grounds maintenance contract SL Tree Care – trees' maintenance	Pentana - BS ISO/IEC 27001:2013 compliant Grounds maintenance contract - compliant Trees maintenance contract - compliant	N/A	N/A	Yes – LOW - risk score 2

PARKS & OPEN SPACES - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

CONSENT, OUTSIDE EEA TRANSFERS, DATA PROCESSOR, MARKETING AND RISKS

Categories of data subject	Recipients of personal data	If lawful basis for processing is CONSENT -is procedure in place for explicit consent and withdrawal of consent	Outside EEA Transfers if yes – have you checked contractual requirements?	Data Processor (i.e. processing undertaken by a third party under contract) & ISAs	Data Processor Contract Checked - to be varied to incorporate 2018 DPA requirements	Marketing	Portability	Risk category (to be mapped in accordance with the Council's corporate/strategic risk impact table) Operational Risk Register updated YES
Identifiable natural persons such as leaseholders, tenants, complainants, applicants, service users etc.	1.Council department(s) 2.Ombudsman 3.Local authorities 4.Parish Councils 5.KCC	N/A	N/A	Pentana – Cloud based – retention only Continental Landscapes Ltd - Grounds maintenance contract SL Tree Care – trees' maintenance	Pentana - BS ISO/IEC 27001:2013 compliant Grounds maintenance contract - compliant Trees maintenance contract - compliant	N/A	N/A	Yes – LOW - risk score 2

PLANNING (INCLUDING FORWARD PLANNING & TROs) - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

Strategic Directorate	Information Asset Owner	Record /Information Description	DPIA ¹	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal /archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held manually and/or on electronic systems (including mobile devices)	Children (under 13) – parental consent normally required
External Services	Head of Regeneration	Production of Planning Policy documents and topic evidence	Applicable if policy or strategies have privacy implications	Supersedes previous version	Common Practice	Disposal	No	N/A	No	N/A	Electronic	N/A
External Services	Head of Regeneration	Strategic Development Monitoring Data	N/A	Supersedes previous version	Common Practice	Secure Disposal	No	N/A	No	N/A	Electronic	N/A
External Services	Head of Regeneration	Forward Planning of sites, including Brownfield Land Register, 5 year housing land supply etc.	N/A	Supersedes previous version	Common Practice	Secure Disposal	Yes (identifiable natural persons only) - name, address, contact details	Legal obligation compliance – National Policy Framework Town and Country Planning (Brownfield Land Register) Regulations 2017	No	N/A	Paper copy &/or electronically	N/A
External Services	Head of Regeneration	Planning Policy/Consultations -correspondence etc.	N/A	3 years from date of file closure	Common Practice	Secure Disposal	Yes (identifiable natural persons only) - name, address, contact details	Public interest task – National Policy Framework	No	N/A	Paper copy &/or electronically in Idox/Planning Portal	N/A
External Services	Head of Regeneration	Traffic Regulation Order Consultations – letters, emails, memos, spreadsheets etc.	N/A	1 year from scheme installation date	Common Practice	Secure Disposal	Yes (identifiable natural persons only) - name, address, contact details	Public interest task - Road Traffic Regulation Act 1984 & Local Authorities' Traffic Orders (Procedure) (England and Wales) Regulations 1996	No	N/A	SNAP electronic database	N/A

¹When building new IT systems for storing or accessing personal data, developing legislation, policy or strategies that have privacy implications, embarking on a data sharing initiative; or using data for new purposes, evaluation or scoring, including profiling, automated decision-making, systematic monitoring of individuals, processing sensitive data, processing data on a large scale, matching or combining datasets, processing data concerning vulnerable data subjects, innovative use or application of technological or organisational solutions, data transfer across borders outside the EU, when the processing in itself "prevents data subjects from exercising a right or using a service or a contract

PLANNING (INCLUDING FORWARD PLANNING & TROs) - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIA	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal/archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held manually and/or on electronic systems (including mobile devices)	Children (under 13) – parental consent normally required
External Services	Head of Regeneration	Planning application process – case file material including reports, and decisions, applications, approvals, and consultations, background information, consultation responses, site photos, reports, S106s/Unilaterals, LDCs, appeal documentation etc.	N/A	Permanent	Common Practice	Archive Secure disposal of paper copies following electronic archive	Yes (identifiable natural persons only) - name, address, contact details	Public interest task – Town and Country Planning Act 1990 and associated Regulations, Orders etc. Planning (Listed Buildings and Conservations Areas) Act 1990	Yes – racial or ethnic origin, state of health data (as applicable to the case file)	Substantial public interest - Town and Country Planning Act 1990 and associated Regulations Orders etc.	Electronically in Idox/Planning Portal/UNIFORM Paper copies retained as appropriate for larger developments, appeals and judicial review period	N/A
External Services	Head of Regeneration	Pre-application enquiries – correspondence etc.	N/A	Permanent	Common Practice	Archive Secure disposal of paper copies following electronic archive	Yes (identifiable natural persons only – name, address, contact details	Public interest task – Town and Country Planning Act 1990 and associated Regulations, Orders etc.	Yes – racial or ethnic origin, state of health data (as applicable to the case file)	Substantial public interest - Town and Country Planning Act 1990 and associated Regulations Orders etc.	Electronic - Idox/UNIFORM	N/A
External Services	Head of Regeneration	The process of planning enforcement – case file material including enforcement notices, appeal decisions etc., Initial complaint log: on-line form/email/letter, record of site visit, photos, evidence, enforcement notices, appeals, court documents	N/A	Permanent	Common Practice	Archive Secure disposal of paper copies following electronic archive	Yes (identifiable natural persons only – name, address, contact details	Substantial public interest - Town and Country Planning Act 1990 and associated Regulations Orders etc.	Yes – racial or ethnic origin, state of health, offences (including alleged offences) criminal proceedings outcomes and sentences (as applicable to the case file)	Substantial public interest - Town and Country Planning Act 1990 and associated Regulations Orders etc./ Legal Claims/ Preventing or detecting unlawful acts	Electronic - Idox/UNIFORM Paper copies of older cases	N/A

PLANNING (INCLUDING FORWARD PLANNING & TROs) - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIA	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal/archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held manually and/or on electronic systems (including mobile devices)	Children (under 13) – parental consent normally required
External Services	Head of Regeneration	National Strategic Infrastructure Projects – statutory register	N/A	Permanent	Statutory	Archive Secure disposal of paper copies following electronic archive	Yes (identifiable natural persons only) – name, address, contact details	Public interest task - Planning Act 2008	No	N/A	Electronic Paper copies retained whilst proposal under consideration	External Services
External Services	Head of Regeneration	Tree Preservation Orders – case file material – correspondence, statutory register	N/A	Permanent	Statutory	Archive Secure disposal of paper copies following electronic archive	Yes (identifiable natural persons only) – name, address, contact details	Public interest task - Town and Country Planning (Tree Preservation)(England) Regulations 2012	No	N/A	Electronic Paper copies retained whilst proposal under consideration	N/A
External Services	Head of Regeneration	Hedgerow Regulations - removal notices, correspondence etc.	N/A	Permanent	Statutory	Archive Secure disposal of paper copies following electronic archive	Yes (identifiable natural persons only) - name, address, contact details	Public interest task - Hedgerows Regulations 1997	No	N/A	Electronic Paper copies retained whilst proposal under consideration	N/A
External Services	Head of Regeneration	Section 106 Agreements/Unilateral Undertakings – case file material -. reports, and decisions, applications, approvals, and consultations, background information, consultation responses, site photos, reports, appeal documentation etc.	N/A	Permanent	Common Practice	Archive Secure disposal of paper copies following electronic archive	Yes (identifiable natural persons only) - name, address, contact details	Public interest task – Town and Country Planning Act 1990	No	N/A	Electronically in Idox/Planning Portal Paper copies retained as appropriate for larger developments, appeals and judicial review period	N/A
External Services	Head of Regeneration	CIL Process – case file material – CIL initial information, assumption of liability, application for exemption and relief, other supporting evidence materials	N/A	10 Year from issue of Demand Notice	Common Practice	Secure disposal	Yes (identifiable natural persons only) - name, address, contact details	Public interest task - Community Infrastructure Levy Regulations 2010	No	N/A	Electronically in Idox Paper copies where relief or exemption 'has been granted and claw-back' period in operation	N/A

PLANNING (INCLUDING FORWARD PLANNING & TROs) - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIA	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal/archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held manually and/or on electronic systems (including mobile devices)	Children (under 13) – parental consent normally required
External Services	Head of Regeneration	Service Level Agreements - for trees: external consultants, ecology, public rights of way etc.	N/A	7 years from date of termination of SLA	Common Practice	Secure Disposal	Yes (identifiable natural persons only) - name, address, contact details	Public interest task – in accordance with the legislation referred to in this IAR (as applicable)	No	N/A	Electronically	N/A
External Services	Head of Regeneration	Local Government & Social Care Ombudsman – case file material - complaints received and outcomes	N/A	1 year from date of case closure unless exceptional circumstances require longer retention e.g. pending court case	Common Practice	Secure Disposal	Yes - (identifiable natural persons only) - name, address, contact details	Public interest task – Local Government Act 1974	Yes- health data, offences (including alleged offences) etc.	Substantial public interest – Section 26(5) Local Government Act 1974	Paper copy &/or electronic - Idox	N/A
External Services	Head of Regeneration	General correspondence – emails, memos, letters etc. not associated with service requests	N/A	1 year unless considered important for future reference	Common Practice	Disposal	Yes - (identifiable natural persons only) – name, address, contact details	Public interest task – in accordance with the legislation referred to in this IAR (as applicable)	No	N/A		N/A
External Services	Head of Regeneration	Performance Indicators	N/A	If a performance indicator is no longer required, deactivate and archive the indicator and delete from Pentana after 1 year	Common Practice	Disposal	No	N/A	No	N/A	Electronic on Pentana	N/A
External Services	Head of Regeneration	High Hedges	N/A	Permanent	Common Practice	Archive Secure disposal of paper copies following	Yes (identifiable natural persons only) – name,	Public interest task - Anti-social Behaviour Act 2003		N/A	Electronic on	N/A

PLANNING (INCLUDING FORWARD PLANNING & TROs) - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

						electronic archive	address, contact details					
External Services	Head of Regeneration	Hazardous Substances	N/A	Permanent	Common Practice	Archive Secure disposal of paper copies following electronic archive	Yes (identifiable natural persons only) – name, address, contact details	Public interest task Planning (Hazardous Substances) Act 1990 and 2015 Regulations	No	N/A	Electronic Paper copies retained whilst proposal under consideration	N/A

PLANNING (INCLUDING FORWARD PLANNING & TROs) - INFORMATION ASSET REGISTER& RECORD OF PROCESSING ACTIVITY (ROPA)

TECHNICAL & ORGANISATIONAL SECURITY MEASURES

Strategic Directorate	Information Asset Owner	IT Systems	Security Measures
Internal Services	I.C.T. Manager	Idox/UNIFORM/ Planning Portal/Academy /Internet/Intranet and department computers and laptops – maintenance and administration	Password administration, data encryption, implementation of PSN based email services, IT services contingency planning, firewall barriers to hackers, virus protection software, full back-up, rescue disks, security audits, regular testing, assessing and evaluating the effectiveness of technical and organisational measures for ensuring the security of the processing, corporate guidance on organisational/security measure, DPIAs
Internal Services	Policy & Corporate Support Manager	Pentana – maintenance & administration	BS ISO/IEC 27001:2013 compliant
External Services	Head of Regeneration	Idox/UNIFORM/ Planning Portal/ Academy/Pentana/ internet/ Intranet and computers and laptops – input of data – the planning process function	Use of passwords
External Services	Head of Regeneration	DBC website – property history	Accessible to the public
Internal Services	I.C.T. Manager	Stay Connected (DBC website) – maintenance & administration	Customer password input and unsubscribe
Internal Services	Customer Services Manager	On-line payments (hosted by Capita)	PCIDSS compliant
Internal Services	I.C.T. Manager	Stay Connected email alerts (DBC website)	Subscriber own password – unsubscribe at any time
External Services	Head of Regeneration	Disaster recovery	See Business Continuity Plan
External Services	Enforcement & Regulatory Services Manager	CCTV – maintenance and administration	A key part of the Council's security setup

PLANNING (INCLUDING FORWARD PLANNING & TROs) - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

CONSENT, OUTSIDE EEA TRANSFERS, DATA PROCESSOR, MARKETING AND RISKS

Categories of data subject	Recipients of personal data (as applicable)	If lawful basis for processing is CONSENT -is procedure in place for explicit consent and withdrawal of consent	Outside EEA Transfers –if yes – have you checked contractual requirements?	Data Processor (i.e. processing undertaken by a third party under contract) & ISAs	Data Processor Contract Checked - to be varied to incorporate 2018 DPA requirements	Marketing	Profiling	Risk category (to be mapped in accordance with the Council's corporate/strategic risk impact table) Operational Risk Register updated YES/NO
Identifiable natural persons such as applicants, complainants, service users etc.	1.Council department(s) 2.Ombudsman 3.Planning Inspectorate 4.Local authorities	N/A	N/A	Pentana – Cloud based – retention only Secure Waste Disposal - no processing - SDC bulk printing – no processing SNAP Webhost survey software – licence	Pentana - BS ISO/IEC 27001:2013 compliant Secure Waste Disposal – confidentiality clause in contract SDC bulk printing SLA – confidentiality clause SNAP – compliant	N/A	N/A	Unlikely & moderate (2) Unlikely & moderate (2) Unlikely & minor (1) Unlikely and moderate (2)

POLICY & CORPORATE SUPPORT - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIA	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal/archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held manually and/or on electronic systems (including mobile devices)	Children (under 13) – parental consent normally required
Internal Services	Policy & Corporate Support Manager	Peter Blake Gallery - application forms to exhibit in art gallery	N/A	6 months after art works are handed back	Common Practice	Secure disposal	Yes (identifiable natural persons only) – name, address, contact details	Public interest task – Public Libraries & Museums Act 1964 (section 12 – art galleries)	No	N/A	Paper copy in locked drawers and electronically in a password protected document	No
Internal Services	Policy & Corporate Support Manager	Corporate Plan – sets out the overall vision for the Borough	N/A	Supersedes previous version	Common Practice	Secure disposal after 10 years	No	N/A	No	N/A	Electronic and on website	No
Internal Services	Policy & Corporate Support Manager	Equality & Diversity Document Framework – sets out the corporate approach to PSED	N/A	Supersedes previous version	Common Practice	Secure disposal after 10 years	No	N/A	No	N/A	Electronic and on website	No
Internal Services	Policy & Corporate Support Manager	Customer Access Reviews – equality impact assessments carried out by all service areas	N/A	Supersedes previous versions	Common Practice	Secure disposal after 10 years	No	N/A	No	N/A	Electronic and on website	No
Internal Services	Policy & Corporate Support Manager	Consultation & Engagement Strategy and Toolkit -sets out the corporate approach to consultation and engagement	N/A	Supersedes previous version	Common Practice	Secure disposal after 10 years	No	N/A	No	N/A	Electronic and on website	No
Internal Services	Policy & Corporate Support Manager	Consultations & Surveys – forms representations etc.	N/A	On closure of consultation	Common Practice	Secure Disposal	Yes (identifiable natural persons only) - name, address, contact details etc.	Public interest task Legal obligation Consent of parent/guardian (young people consultations/ surveys) Legitimate interests	Yes – gender, health, ethnicity	Substantial public interest	Electronic & on website	No

POLICY & CORPORATE SUPPORT - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIA	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal/archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held manually and/or on electronic systems (including mobile devices)	Children (under 12) - parental consent normally required
Internal Services	Policy & Corporate Support Manager	Performance Indicator - Data Quality Policy – sets out the corporate approach to data quality standards for performance indicator management	N/A	Supersedes previous version	Common Practice	Disposal after 10 years	No	N/A	No	N/A	Electronic and on website	No
External Services	Strategic Director (External)	Safeguarding Policy – sets out the corporate approach to safeguarding children and adults at risk from abuse and neglect	Yes	Supersedes previous version	Common Practice	Disposal after 10 years	No	N/A	No	N/A	Electronic and on website	No
External Services	Strategic Director (External)	Modern Anti-Slavery & Human Trafficking Statement – sets out the corporate approach to ensure no slavery or human trafficking in the Council's business, and supply chains	N/A	Supersedes previous version	Common Practice	Superseded versions available online (para. 7.5 Transparency in Supply Chains – Home Office)	No	N/A	No	N/A	Electronic and on website	No
Internal Services	Policy & Corporate Support Manager	Social Media Policy – sets out the corporate approach to using social media	N/A	Supersedes previous version	Common Practice	Disposal after 10 years	No	N/A	No	N/A	Electronic	No
Internal Services	Policy & Corporate Support Manager	Performance indicators – for part of Policy & Corporate Support's function	N/A	If a performance indicator is no longer required, deactivate and archive the indicator and delete from Pentana after 1 year	Common Practice	If a performance indicator is no longer required, deactivate and archive the indicator and delete from Pentana after 1 year	No	N/A	No	N/A	Electronically on Pentana	No
Internal Services	Policy & Corporate Support Manager	Safeguarding Training Records – staff training records and certificates	N/A	3 years	Common Practice	Secure disposal	Yes- personal contact details such as name, title etc.	Public interest task – Children Act 2004/Care Act 2014 Statutory Guidance - Working Together to Safeguard Children Care & Support Statutory Guidance	No	N/A	Electronic	No

POLICY & CORPORATE SUPPORT - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIA	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal/archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held manually and/or on electronic systems (including mobile devices)	Children (under 13) - parental consent normally required
Internal Services	Policy & Corporate Support Manager	Dartford Youth Council - parental consent forms	N/A	3 months after the DYC member leaves	Common Practice	Secure disposal	Yes - personal contact details such as name, title, addresses, telephone numbers & personal email addresses and images	Public interest task – Localism Act 2011 –section 1	Yes – health data	Substantial public interest - Local Government Act 2000 – section 2	Hard copy and Electronic	No
Internal Services	Policy & Corporate Support Manager	Elders Forum - database	N/A	Retained until member leaves the Forum	Common Practice	Deletion from database	Yes - personal contact details such as name, title, addresses, telephone numbers & personal email addresses	Public interest task – Localism Act 2011 – section 1	No	N/A	Electronic	No
Internal Services	Policy & Corporate Support Manager	Events - applications for events tickets	N/A	2 years following the event	Common Practice	Deletion from database	Yes - personal contact details such as name, title, addresses, telephone numbers & personal email addresses	Public interest task – Local Government (Miscellaneous Provisions) Act 1976 - section 19 Local Government Act 2003 – section 93 & Legitimate Interests	No	N/A	Electronic	No

POLICY & CORPORATE SUPPORT - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIA	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal/archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held manually and/or on electronic systems (including mobile devices)	Children (under 13) - parental consent normally required
Internal Services	Communities & Business Team (SDC ¹)	Adult Weight Management Programme Reports – referrals & anonymised statistics	N/A	Delete following input into SDC's system	Common Practice	Secure disposal	Yes - contact details such as name, title, addresses, telephone numbers & personal email addresses	Public interest task – Localism Act 2011 – section 1 Health & Social Care Act 2012	Yes – medical/health data	Substantial public interest - Localism Act 2011 Health & Social Care Act 2012	Paper copies/ Data entered onto an excel spreadsheet that is password protected	No
Internal Services	Communities & Business Team (SDC)	Family Weight Management Programme - referrals & anonymised statistics	N/A	Delete following input into SDC's system	Common Practice	Secure disposal	Yes - contact details such as name, title, addresses, telephone numbers & personal email addresses	Ditto above	Yes – medical/health data	Ditto above	Paper copies/ Data entered onto an excel spreadsheet that is password protected	Yes
Internal Services	Communities & Business Team (SDC)	Health Walks - referrals & anonymised statistics	N/A	Delete following input into SDC's system	Common Practice	Secure disposal	Yes - contact details such as name, title, addresses, telephone numbers & personal email addresses	Ditto above	Yes - medical/health data	Ditto above	Paper copies/ Data entered onto an excel spreadsheet that is password protected	No
Internal Services	Communities & Business Team (SDC)	Postural Stability Classes - Evaluation forms and anonymised statistics	N/A	Delete following input into SDC's system	Common Practice	Secure disposal	Yes - contact details such as name, title, addresses, telephone numbers & personal email addresses	Ditto above	Yes – medical/health data	Ditto above	Manual-paper copies Data entered onto an excel spreadsheet that is password protected	No

¹ Sevenoaks District Council

POLICY & CORPORATE SUPPORT - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIA	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal/archiving	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held manually and/or on electronic systems (including mobile devices)	Children (under 13) - parental consent normally required
Internal Services	Curator	Accession records for Museum objects – provenance of artefacts which is part of their history and also records of legal transfer of ownership	N/A	Permanent	Common Practice	Archive	Yes - contact details such as name, title, addresses, telephone numbers & personal email addresses	Public interest task – Libraries & Museums Act 1964 Local Government Act 1972	No	N/A	Index cards and in ledger books kept in locked offices and fire-proof security cabinets and also electronically on password protected Modes Complete database	No
Internal Services	Curator	School Loan Service forms (Museum) - loan forms, letters of introduction from Head Teachers for first loan etc.	N/A	1 year from date of loan	Common Practice	Secure disposal	Yes - contact details such as name, title, addresses, telephone numbers & personal email addresses	Public interest task- Libraries & Museums Act 1964 Local Government Act 1972	No	N/A	Paper copies kept in folder in locked office	No
Internal Services	Curator	Object Entry Forms for incoming loans or items left for identification (Museum)	N/A	Permanent	Common Practice	Archive	Yes - contact details such as name, title, addresses, telephone numbers & personal email addresses	Public interest task- Libraries & Museums Act 1964 Local Government Act 1972	No	N/A	Paper copies kept in folder in locked office - Identification reports also held as Word documents on computer in locked office	No
Internal Services	Policy & Corporate Support Manager	Dartford Town Centre Heritage Initiative Grant Scheme – applications, decisions etc.	N/A	6 years after closure of the whole scheme, (likely 2024)	Contractual	Secure disposal	Yes - contact details such as name, title, addresses, telephone numbers & personal email addresses	Public interest task – Local Government Act 1972 – section 137	No	N/A	Paper copy & Electronic	No

POLICY & CORPORATE SUPPORT - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIA	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal/archiving	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held manually and/or on electronic systems (including mobile devices)	Children (under 13) - parental consent normally required
Internal Services	Policy & Corporate Support Manager	Dartford Festival (annual) - database of stall holders, administration forms etc.	N/A	Supersedes previous version	Common Practice	Secure disposal	Yes - contact details such as name, title, addresses, telephone numbers & personal email addresses	Public interest task - Local Government (Miscellaneous Provisions)Act) 1976	No	N/A	Paper copy & Electronic	No
Internal Services	Policy & Corporate Support Manager	Dartford Festival (annual) - Disabled access enquiries, e.g. requests for viewing platform wristbands.	N/A	6 months from date of event	Common Practice	Secure disposal	Yes - contact details such as name, title, addresses, telephone numbers & personal email addresses	Legal obligation and public interest task	Yes – health data	?	Paper copy & Electronic	Yes
Internal Services	Policy & Corporate Support Manager	Grants - applications, decisions etc.	N/A	2 years from date of grant	Common Practice	Secure disposal	Yes - contact details such as name, title, addresses, telephone numbers & personal email addresses	Public interest task - Local Government (Miscellaneous Provisions) Act 1976 section 19 Local Government Act 1972 – section 137- Localism Act 2011 section 2	No	N/A	Paper copy & Electronic	No
Internal services	Policy & Corporate Support Manager	Projects, events & heritage – tenders, specifications & general correspondence	N/A	6 years from date of closure (excluding documents considered important for future reference)	Common Practice	Secure disposal	Yes (identifiable natural persons only) – name, address, contact details	Performance of a contract/taking steps preparatory to such a contract	No	N/A	Paper copy & Electronic	No
Internal Services	Policy & Corporate Support Manager	Capital Works – contracts & agreements	N/A	12 years from termination of the contract	Common Practice	Secure disposal	Yes (identifiable natural persons only) – name, address, contact details	Performance of a contract/taking steps preparatory to such a contract	No	N/A	Paper copy & Electronic	No
Internal Services	Town Centre & Business Support Manager	Town Centre Liaison - Correspondence with Local , Businesses Promotions, Sponsorship etc.	N/A	7 years	Common Practice	Secure disposal	Yes (identifiable natural persons only) – name, address, contact details	Public interest task –Localism Act 2011 – section1 -	No	N/A	Paper copy & Electronic	N/A

POLICY & CORPORATE SUPPORT - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIA	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal/archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held manually and/or on electronic systems (including mobile devices)	Children (under 13) - parental consent normally required
Internal Services	Town Centre & Business Support Manager	Market Stalls & Street Trading Licensing – details of stall holders, permits etc.	N/A	7 years	Common Practice	Secure disposal	Yes (identifiable natural persons only) - name, address, contact details etc.	Performance of a contract/taking steps preparatory to such a contract/ Legal obligation/public interest task – Highways Act 1980 Local Government (Miscellaneous Provisions) Act 1982	Yes – criminal offences, conviction and alleged offences	Substantial public interest – Local Government (Miscellaneous Provisions) Act 1982 Highways Act 1980	Paper copy & Electronic	N/A
Internal Services	Policy & Corporate Support Manager	Assets of Community Value – nominations, bids, appeals, reviews, registers etc.	N/A	ACV Register- 5 years from listing date unless removed earlier for any reason, for example as a result of an appeal	Statutory for ACV Register Common Practice for background documentation	Secure disposal of application forms	Yes (identifiable natural persons only) - name, address, contact details etc.	Legal obligation/public interest task – Localism Act 2011 and Assets of Community Value (England) Regulations 2012	No	N/A	Paper copy & Electronic	N/A
Internal Services	Policy & Corporate Support Manager	Public events – lost children and vulnerable adults - reports	N/A	One year from date of concern/enquiry	Common Practice	Secure disposal	Yes (identifiable natural persons only) - name, address, contact details etc.	Legal obligation and public interest task	Yes – health data	Substantial public interest – Children Act 1989 Children Act 2004 & Working Together to Safeguard Children (Statutory Guidance) Care Act 2014 & Care and Support (Statutory Guidance (2014))	Paper copy & Electronic	Yes
Internal Services	Policy & Corporate Support Manager	Public events – lost & found property forms	N/A	6 months from date of file closure	Common Practice	Secure disposal	Yes (identifiable natural persons only) - name, address, contact details etc.	Legitimate Interests	No	N/A	Paper copy & Electronic	No

POLICY & CORPORATE SUPPORT - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIA	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal/archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held manually and/or on electronic systems (including mobile devices)	Children (under 13) - parental consent normally required
Internal Services	Policy & Corporate Support Manager	Awards Nominations- application forms, decisions etc.	N/A	2 years from date of award	Common Practice	Secure Disposal	Yes (identifiable natural persons only) - name, address, contact details etc.	Public interest task- Local Government Act 2000 section 2 Localism Act 2011 –section 1 Consent of parents/guardians (young persons under 13 years of age) - Consent of successful nominees to ensuing publicity	Yes- health, gender, ethnicity	Substantial public interest- Local Government Act 2000 section 2 Localism Act 2011 – section 1	Paper copy & electronic	Possible
Internal Services	Policy & Corporate Support Manager	Photographs & digital images – photos, digital images, consent forms, request to withdraw consent	N/A	1 year from date of consent –if to be retained longer, fresh consent to be sought or delete immediately following request to withdraw consent	Common Practice	Secure disposal	Yes - personal contact details such as name, title, addresses, telephone numbers & personal email addresses	Consent of a parent or guardian for children and young people under the age of 13, adults lacking capacity or where attendees and participants will be named or quoted in a publication Legitimate Interests	Yes- physical limitations e.g. wheelchair use	Consent	Paper copy/ electronic	Yes -with parental consent

POLICY & CORPORATE SUPPORT - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

CONSENT, OUTSIDE EEA TRANSFERS, DATA PROCESSOR, MARKETING AND RISKS

Categories of data subject	Recipients of personal/sensitive data	If lawful basis for processing is CONSENT -is procedure in place for explicit consent and withdrawal of consent	Outside EEA Transfers YES/NO –if yes – have you checked contractual requirements?	Data Processor (i.e. processing undertaken by a third party under contract) & ISAs	Data Processor Contract Checked - to be varied to incorporate 2018 DPA requirements	Marketing	Portability	Risk category (to be mapped in accordance with the Council's corporate/strategic risk impact table) Operational Risk Register updated YES/NO
Identifiable natural persons such as leaseholders, tenants, complainants, applicants, service users, B2B etc.	1.CSU (Dartford Festival) 2.Police (Dartford Festival) 3.NHS (Dartford Festival) 4.Public Health (anonymised data) 5.KCC (safeguarding) 6.One You Kent – lifestyle service	YES Peter Blake Gallery (soft opt-in rule & ability to unsubscribe at any time) Stay Connected (DBC website) -& ability to unsubscribe at any time)	N/A	Pentana – Cloud based – retention only Secure Waste Disposal - no processing MACCS	Pentana - BS ISO/IEC 27001:2013 - compliant Secure Waste Disposal – confidentiality clause in contract MACCS – processing of personal information on a hand held system – compliant	YES – Town Centre Liaison marketing initiatives	N/A	YES – High –Score 9

POLICY & CORPORATE SUPPORT - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

TECHNICAL & ORGANISATIONAL SECURITY MEASURES

Strategic Directorate	Information Asset Owner	IT Systems	Security Measures
Internal Services	I.C.T. Manager	Computer systems – maintenance and administration	Password administration, data encryption, implementation of PSN based email services, IT services contingency planning, firewall barriers to hackers, virus protection software, full back-up, rescue disks, security audits, regular testing, assessing and evaluating the effectiveness of technical and organisational measures for ensuring the security of the processing, corporate guidance on organisational/security measure, clear desks, DPIAs
Internal Services	I.C.T. Manager	On-line payments – maintenance & administration	PCIDSS compliant
Internal Services	I.C.T. Manager	Stay Connected (DBC website) – maintenance & administration	Customer password input and unsubscribe
Internal Services	Policy & Corporate Support Manager	Pentana/Intranet/Internet/ computer systems – input of data related to policy & corporate support	Password administration
Internal Services	Policy & Corporate Support Manager	Pentana – maintenance & administration	BS ISO/IEC 27001:2013 compliant
Internal Services	Policy & Corporate Support Manager with IT Services support	Disaster recovery	See Business Continuity Plan
External Services	Enforcement & Regulatory Services Manager	CCTV – administration and management	A key part of the Council's security setup

PRIVATE SECTOR HOUSING - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIA ¹	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal/archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held manually and/or on electronic systems (including mobile devices)	Children (under 13) – parental consent normally required
External Services	Head of Housing	Policies/strategies on a range of service related matters	Applicable if policy or strategies have privacy implications	Supersedes previous version	Common Practice	Archive	No	N/A	No	N/A	Electronic	No
External Services	Head of Housing	Fees for HMO/Caravan Sites' Licensing – schedule of fees	N/A	Supersedes previous version	Common Practice	Disposal	No	N/A	No	N/A	Electronic	No
External Services	Head of Housing	Single household disrepair case management and harassment & illegal eviction cases - case file material – correspondence, notices, decisions etc.	N/A	3 years from date of file closure (may need to be kept beyond the retention e.g. for evidential purposes)	Common Practice	Secure Disposal	Yes - (identifiable natural persons only) - name, address, contact details/ occupancy info etc.	Public interest task – Protection from Eviction Act 1977 Housing Act 2004 (as applicable)	Yes – health data, alleged offences etc.	Substantial public interest – Protection from Eviction Act 1977 Housing Act 2004 (as applicable)	Paper copy &/o electronic	N/A but see safeguarding
External Services	Head of Housing	Houses in Multiple Occupation – checking standards/hazards under the Housing Act 2004 including HMO Management Regulations - case file material - correspondence, decisions, etc.	N/A	3 years from date of file closure (may need to be kept beyond the retention e.g. for evidential purposes) or when HMO property ceases to be an HMO (risks are higher and the Council may revisit to check continued compliance with standards)	Common Practice	Secure Disposal	Yes - (identifiable natural persons only) - name, address, contact details/ occupancy info etc.	Public interest task - Housing Act 2004 Licensing and Management of Houses In Multiple Occupation and Other Houses (Miscellaneous Provisions) (England) Regulations 2006	No	N/A	Paper copy &/or electronic	N/A – but see safeguarding

¹ When building new IT systems for storing or accessing personal data, developing legislation, policy or strategies that have privacy implications, embarking on a data sharing initiative; or using data for new purposes, evaluation or scoring, including profiling, automated decision-making, systematic monitoring of individuals, processing sensitive data, processing data on a large scale, matching or combining datasets, processing data concerning vulnerable data subjects, innovative use or application of technological or organisational solutions, data transfer across borders outside the EU, when the processing in itself "prevents data subjects from exercising a right or using a service or a contract

PRIVATE SECTOR HOUSING - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIA ²	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal/archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held manually and/or on electronic systems (including mobile devices)	Children (under 13) – parental consent normally required
External Services	Head of Housing	Houses in Multiple Occupation Licensing – case file material – correspondence, decisions, licences etc. Public Register	N/A	5 years from date of file closure (may need to be kept beyond the retention e.g. for evidential purposes) or when HMO property ceases to be an HMO (risks are higher and the LA may re-visit to check continued compliance with standards)	Common Practice	Secure Disposal	Yes - (identifiable natural persons only) - name, address, contact details/ occupancy info, dates & places of birth, declarations etc.	Public interest task - Housing Act 2004 Licensing And Management Of Houses In Multiple Occupation And Other Houses (Miscellaneous Provisions) (England) Regulations 2006	Yes - racial or ethnic origin, state of health, offences (including alleged offences) criminal proceedings outcomes and sentences (as applicable)	Substantial public interest/ Legal obligation compliance Housing Act 2004	Paper copy &/or electronic	N/A
External Services	Head of Housing	Caravan Site Licences – site information, site owner personal data for licence. Public Register	N/A	2 years after formal expiry/ending of licence	Common Practice	Secure Disposal	Yes - (identifiable natural persons only) -- name, address, contact details/ occupancy info	Public interest task - Caravan Sites and Control of Development Act 1960	No	N/A	Paper copy &/or electronic	N/A
External Services	Head of Housing	Empty properties - case file material – correspondence etc.	N/A	3 years from date of file closure (may need to be kept beyond the retention e.g. for evidential purposes)	Common Practice	Secure Disposal	Yes - (identifiable natural persons only) – pensions, probate etc.	Public interest task -Housing Act 1985 Housing Act 2004 Section 85 Local Government Act 2003	No	N/A	Paper copy &/or electronic	N/A

² When building new IT systems for storing or accessing personal data, developing legislation, policy or strategies that have privacy implications, embarking on a data sharing initiative; or using data for new purposes, evaluation or scoring, including profiling, automated decision-making, systematic monitoring of individuals, processing sensitive data, processing data on a large scale, matching or combining datasets, processing data concerning vulnerable data subjects, innovative use or application of technological or organisational solutions, data transfer across borders outside the EU, when the processing in itself "prevents data subjects from exercising a right or using a service or a contract

PRIVATE SECTOR HOUSING - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIA ³	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal/archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held manually and/or on electronic systems (including mobile devices)	Children (under 13) – parental consent normally required
External Services	Head of Housing	Enforcement Action – formal actions – notices, works in default, management orders, single households, HMOs, HMO licensing, caravan site licences, empty properties, carbon/ smoke detectors	N/A	3 years from date of file closure (may need to be kept beyond the retention e.g. for evidential purposes)	Common Practice	Secure Disposal	Yes - (identifiable natural persons only) - -- name, address, contact details	Public interest task - Caravan Sites and Control of Development Act 1960 Housing Act 2004 Smoke And Carbon Monoxide Alarm (England) Regulations 2015 (as applicable)	Yes - racial or ethnic origin, offences (including alleged offences) criminal proceedings outcomes and sentences (as applicable)	Legal claims/legal proceedings - Caravan Sites and Control of Development Act 1960 Housing Act 2004 Smoke And Carbon Monoxide Alarm (England) Regulations 2015 (as applicable)	Paper copy &/or electronic	N/A
External Services	Head of Housing	Disabled Facilities Grants- applications, correspondence, decisions customer satisfaction surveys etc.	N/A	11 years from date of grant payment 2 years where withdrawn or refused	Common Practice	Secure Disposal	Yes - (identifiable natural persons only) - name, address, contact details, financial, dates of birth etc.	Public interest task - Housing Grants, Construction and Regeneration Act 1996	Yes – health data	Substantial public interest - Housing Grants, Construction and Regeneration Act 1996	Paper copy &/or electronic	YES – with parental consent

³ When building new IT systems for storing or accessing personal data, developing legislation, policy or strategies that have privacy implications, embarking on a data sharing initiative; or using data for new purposes, evaluation or scoring, including profiling, automated decision-making, systematic monitoring of individuals, processing sensitive data, processing data on a large scale, matching or combining datasets, processing data concerning vulnerable data subjects, innovative use or application of technological or organisational solutions, data transfer across borders outside the EU, when the processing in itself "prevents data subjects from exercising a right or using a service or a contract

PRIVATE SECTOR HOUSING - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIA	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal/archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held manually and/or on electronic systems (including mobile devices)	Children (under 13) - parental consent normally required
External Services	Head of Housing	Discretionary Assistance – applications, correspondence, decisions etc.	N/A	Decent Homes Assistance - Retained until sale Empty Homes Assistance - retained until sale Empty Property Loan Assistance - 4 years Property Accreditation Assistance - Retained until sale Solar Hot Water Assistance - 3 years Hard to Heat Homes - 3 years Decent Homes Assistance (top ups) - Retained until sale Coldbusters - 12 years Healthy Homes Assistance- 3 years Discretionary Assistance Grant – 3 years (unless cost is over £5000 and then 11 years) Winter Warmth Assistance – 10 years from payment Hospital Discharge Grant – 3 years Safe & Secure Grant – 3 years	Common Practice	Secure Disposal	Yes - (identifiable natural persons only) - name, address, contact details, financial, dates of birth etc.	Public interest task – Housing Act 2004 Home Energy Conservation Act 1995 Digital Economy Act 2017 The Regulatory Reform (Housing Assistance) (England and Wales) Order 2002	Yes – health data	Substantial public interest - Housing Act 2004 Home Energy Conservation Act 1995 Digital Economy Act 2017 The Regulatory Reform (Housing Assistance) (England and Wales) Order 2002	Paper copy &/or electronic	N/A

PRIVATE SECTOR HOUSING - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIA	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal/archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held manually and/or on electronic systems (including mobile devices)	Children (under 13) - parental consent normally required
External Services	Head of Housing	Energy Efficiency – advice/assistance via third parties e.g. utility companies etc., promotional work	N/A	5 years	Common Practice	Secure Disposal	Yes - (identifiable natural persons only - name, address, contact details, financial, dates of birth etc.	Public interest task – Home Energy Conservation Act 1995 Digital Economy Act 2017	Yes – health data	Substantial public interest – Home Energy Conservation Act 1995 Digital Economy Act 2017	Paper copy &/or electronic Alerts on DBC website	N/A
External Services	Head of Housing	Housing condition reports for Immigration Inspections – service offered for a fee to residents , interim & management orders (rogue landlords)	N/A	3 years after file closure	Common Practice	Secure Disposal	Yes - (identifiable natural persons only) - name, address, contact details, financial, dates of birth etc. Financial penalties (rogue landlords)	Legal obligation compliance (where requested by Border Force) - UK Entry Clearance requirements Public interest task (where requested by service user) – UK Entry Clearance requirements	Yes - racial or ethnic origin, offences (including alleged offences) criminal proceedings outcomes and sentences (as applicable)	Legal obligation compliance - UK Entry Clearance requirements Substantial public interest- - UK Entry Clearance requirements	Paper copy &/or electronic	N/A
External Services	Head of Housing	Emergency works - unsafe conditions in residential accommodation – case file material – correspondence, notices etc.	N/A	3 years from date of file closure (may need to be kept beyond the retention e.g. for evidential purposes)	Common Practice	Secure Disposal	Yes- (identifiable natural persons only - name, address, contact details	Public interest task – Housing Act 2004	No	N/A	Paper copy/ electronic	N/A

PRIVATE SECTOR HOUSING - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIA	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal/archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held manually and/or on electronic systems (including mobile devices)	Children (under 13) - parental consent normally required
External Services	Head of Housing	Adaptations, small handyperson jobs and information for older or disabled people -assist with hospital discharge and offering a service to help residents retain safe & independent living within their homes	N/A	3 years from date of file closure (may need to be kept beyond the retention e.g. for evidential purposes)	Common Practice	Secure Disposal	Yes - (identifiable natural persons only - name, address, contact details	Public interest task - Housing Act 2004 The Regulatory Reform (Housing Assistance) (England and Wales) Order 2002	Yes- health data -	Substantial public interest– Housing Act 2004	Paper copy/electronic	N/A
External Services	Head of Housing	Works in default of enforcement action –case file material- correspondence, notices etc.	N/A	3 years from date of file closure (may need to be kept beyond the retention e.g. for evidential purposes)	Common Practice	Secure Disposal	Yes - (identifiable natural persons only - name, address, contact details	Public interest task- Housing Act 2004	No	N/A	Paper copy/electronic	N/A
External Services	Head of Housing	Collective Switching – electric/gas usage – bid to bulk buy – registrations/contract/ progress reports	N/A	5 years (registration etc.,) 1 year from contract expiry	Common Practice	Secure Disposal	Yes - (identifiable natural persons only - name, address, contact details – received from IChoosr	Public interest task- Home Energy Conservation Act 1995 Digital Economy Act 2017	No	N/A	Paper copy/electronic	N/A
External Services	Head of Housing	LA Flexible Eligibility Programme - energy efficiency measures, reports, spreadsheets, correspondence	N/A	5 years	Common Practice	Secure Disposal	Yes - identifiable natural persons only - name, address, contact details	Public interest task Home Energy Conservation Act 1995 Digital Economy Act 2017	Yes health data	N/A	Paper copy/electronic	N/A
External Services	Head of Housing	Winter Warmth	N/A	11 years from date of grant payment. 2 years where grants approval not progressed	Common practice	Secure disposal	Yes – identifiable natural persons only – name, address, contact details	Public interest task – Home Energy Conservation Act 1995 Digital Economy Act 2017	Yes, health data	Substantial public interest– Home Energy Conservation Act 1995 Digital Economy Act 2017	Paper copy/electronic	N/Z

PRIVATE SECTOR HOUSING - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIA	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal/archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held manually and/or on electronic systems (including mobile devices)	Children (under 13) - parental consent normally required
External Services	Head of Housing	Kent & Medway Sustainable Energy Partnership (Kent Warm Homes Scheme) - warm homes initiative	N/A	5 years	Common Practice	Secure Disposal	Yes - (identifiable natural persons only - name, address, contact details, financial data	Public interest task – Home Energy Conservation Act 1995	Yes - health data, benefit data	Substantial public interest task –Home Energy Conservation Act 1995	Paper copy/electronic	N/A
External Services	Head of Housing	Interreg 2 Seas Mers Zeeen - Triple – A - adoption of low-carbon technologies by home-owners through awareness and easy Access (Triple A)	N/A	5 years	Common Practice	Secure Disposal	Yes - (identifiable natural persons only - name, address, contact details, financial data	Public interest task – Home Energy Conservation Act 1995	Yes, health data, benefit data	Substantial public interest task –Home Energy Conservation Act 1995	Paper copy/electronic	N/A
External Services	Head of Housing	Home Energy Conservation Act biannual reports	N/A	5 years	Common Practice	Disposal	No	N/A	No	N/A	Paper copy/electronic	N/A
External Services	Head of Housing	Kent & Medway Fire & Rescue Authority – consultations on improvement works to properties	N/A	3 years from date of file closure (may need to be kept beyond the retention e.g. for evidential purposes)	Common Practice	Secure Disposal	Yes - (identifiable natural persons only - name, address, contact details	Public interest task - Housing Act 2004	No	N/A	Paper copy/electronic	N/A
External Services	Head of Housing	Correspondence (general- not specific case related) – emails, letters, memos etc.	N/A	1 year unless considered important for future reference	Common Practice	Secure Disposal	Yes - (identifiable natural persons only - name, address, contact details	Public interest task – in accordance with the legislation outlined in this IAR (as applicable)	Yes	Substantial public interest – in accordance with legislation as outline din this IAR (as applicable)	Paper copy/electronic	N/A
External Services	Head of Housing	Performance Indicators - for the PSH function	N/A	1 year from date of entry on Pentana	Common Practice	Disposal	No	N/A	No	N/A	Electronic – on Pentana	N/A
External Services	Head of Housing	Greenhouse Gas Emissions - reporting to Government	N/A	5 years	Common practice	Secure Disposal	Yes, name vehicle details, utility usage	Public interest task – Climate Change Act 2008	No	N/A	Paper copy/electronic	N/A

PRIVATE SECTOR HOUSING - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIA	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal/archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held manually and/or on electronic systems (including mobile devices)	Children (under 13) - parental consent normally required
External Services	Head of Housing	Display Energy Certificates and Energy performance certificates	N/A	10 years	Common practice	Secure disposal	Yes - individual property details	Public interest task - Energy Performance of Buildings (England and Wales) Regulations 2012	No	N/A	Paper copy/electronic	N/A
External Services	Head of Housing	Warmer Street Project- correspondence etc.	N/A	5 years (may need to be kept beyond the retention period for evidential purposes)	Common practice	Secure disposal	Yes – names, addresses etc.	Public interest task - Home Energy Conservation Act 1995	No	N/A	Paper copy/electronic	N/A
External services	Head of Housing	Rogue landlords & letting agents – Notice of intended proceedings, banning orders, database, rent repayment orders	N/A	For duration of banning order For duration of the period specified in the banning order offence decision notice	Statutory	Secure disposal	Yes- name, address, property details, financial penalties etc.	Public interest task - Housing and Planning Act 2016	Yes- conviction (including alleged offences)	Substantial public interest - Housing and Planning Act 2016	Electronic Public register	N/A
External Services	Head of Housing	Councillor & MP Enquiries	N/A	3 years (unless considered important for future reference)	Common Practice	Secure Disposal	Yes - (identifiable natural persons only) – name, address, contact details	Public interest task pursuant to: Housing Act 1985 Housing Act 1996	Yes – health data etc. (as applicable)	Substantial public interest pursuant to Housing Act 1985 Housing Act 1996	Electronic	N/A
External Services	Head of Housing	Housing Ombudsman & Local Government & Social Care Ombudsman - complaints received and outcomes – case file material	N/A	Lifetime of tenancy or 2 years after closure of case	Common Practice	Secure Disposal	Yes - identifiable natural persons only) – name, address, contact details	Public interest task – Local Government Act 1974	Yes – racial/ ethnic origin, health data, alleged offences etc. (as applicable)	Substantial public interest task – Section 26(5) Local Government Act 1974	Paper copy &/or electronic in Idox	N/A
External Services	Head of Housing	Complaints – case file, correspondence etc.	N/A	Lifetime of tenancy or 3 years after closure of case	Common Practice	Secure Disposal	Yes (identifiable natural persons only) - name, address, contact details	Public interest task pursuant to legislation referred to in this IAR	Yes - racial or ethnic origin, state of health etc.	Substantial public interest pursuant to legislation referred to in this IAR	Paper copy &/or electronically in Idox	YES – with parental consent

PRIVATE SECTOR HOUSING - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIA	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal/archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held manually and/or on electronic systems (including mobile devices)	Children (under 13) - parental consent normally required
External Services	Head of Housing	Multi-disciplinary team referrals – provision of practical assistance for persons in need	N/A	Life of tenancy	Common Practice	Secure Disposal	Yes (identifiable natural persons only) - name, address, contact details	Public interest task pursuant to legislation referred to in this IAR	Yes – health data	Substantial public interest pursuant to legislation referred to in this IAR	Paper copy &/or electronically in Idox	Yes – with parental consent
External Services	Head of Housing	Fuel Poverty Schemes - alleviating fuel poverty	N/A	Life of tenancy	Common Practice	Secure Disposal	Yes (identifiable natural persons only) - name, address, contact details	Public interest task pursuant to Digital Economy Act 2017	Yes – health data	Substantial public interest pursuant to Digital Economy Act 2017	Paper copy &/or electronically in Idox	N/A
External Services	Head of Housing	Telephone recording – outgoing & incoming calls to DBC Housing staff for quality and training purposes	No	3 months from date of recording	Common Practice	Secure Disposal	Yes - identifiable natural persons only) - name, address, contact details/ financial data	Public interest task pursuant to legislation referred to in this IAR	No	N/A	Audio	No
External Services	Head of Housing	Housing Stock Modelling and Integrated Database Project – Analysing data to help plan and develop private sector housing strategy	Yes	7 years	Common Practice	Secure disposal	Yes - address, financial data	Public interest task - Housing Act 2004 Parts 1-4	No	N/a	Electronic	N/A

PRIVATE SECTOR HOUSING - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIA	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal/archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held manually and/or on electronic systems (including mobile devices)	Children (under 18) -
External Services	Head of Housing	Safeguarding Referrals (children & adults at risk)	Yes	Delete immediately following receipt by KCC	Common Practice	Secure Disposal	Yes – (identifiable natural persons only) - name , address, contact details	Public interest task/legal obligation – Children Act 2004/Care Act 2014 Statutory Guidance - Working Together to Safeguard Children Children Care & Support Statutory Guidance	Yes – health data, offences (including alleged offences)	Substantial public interest task/legal obligation – Children Act 2004/Care Act 2014 - Working Together to Safeguard Children Care & Support Statutory Guidance	Paper copy &/or electronic	Yes

PRIVATE SECTOR HOUSING - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

TECHNICAL & ORGANISATIONAL SECURITY MEASURES

Strategic Directorate	Information Asset Owner	IT Systems	Security Measures
Internal Services	I.C.T. Manager	Idox/UNIFORM and department computers and laptops, internet/intranet – maintenance and administration	Password administration, data encryption, implementation of PSN based email services, IT services contingency planning, firewall barriers to hackers, virus protection software, full back-up, rescue disks, security audits, regular testing, assessing and evaluating the effectiveness of technical and organisational measures for ensuring the security of the processing, corporate guidance on organisational/security measure, DPIAs, DPA compliant contracts
External Services	Head of Housing	Idox/UNIFORM and computers and laptops/Internet/Intranet - - input of data – PSH functions	Use of passwords
Internal Services	Customer Services Manager	On-line payments (hosted by Capita)	PCIDSS compliant
External Services	Head of Housing	Disability Facilities Grant – financial assessment using FERRET program	User password
Internal Services	I.C.T. Manager	Stay Connected email alerts (DBC website)	Subscriber own password – unsubscribe at any time
External Services	Head of Housing	Disaster recovery	See Business Continuity Plan
External Services	Enforcement & Regulatory Services Manager	CCTV	A key part of the Council's security setup
External services	Head of Housing	Collective Switching	Use of passwords
External Services	Head of Housing	Warm Homes	Use of passwords
External Services	Head of Housing	LA Flex	Use of passwords
External Services	Head of Housing	Housing Stock Modelling and Integrated Database project - BRE	Use of passwords

PRIVATE SECTOR HOUSING - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

CONSENT, OUTSIDE EEA TRANSFERS, DATA PROCESSOR, MARKETING AND RISKS

Categories of data subject	Recipients of personal/sensitive data (as applicable)	If lawful basis for processing is CONSENT -is procedure in place for explicit consent and withdrawal of consent	Outside EEA Transfers YES/NO –if yes – have you checked contractual requirements?	Data Processor (i.e. processing undertaken by a third party under contract) & ISAs	Data Processor Contract Checked - to be varied to incorporate 2018 DPA requirements?	Marketing	Portability	Risk category (to be mapped in accordance with the Council's corporate/strategic risk impact table) Operational Risk Register updated YES/NO
Identifiable natural persons such as leaseholders, tenants, complainants, applicants, service users etc.	1.Council department(s) 2.Courts/tribunals etc. 3.Housing Associations 4.Contractors 5.Ombudsmen 6.Peabody 7.Kent & Medway Fire & Rescue Authority 8.KCC 9.NHS 10.Social Services 11.Mortgage providers 12DFG agents 13.EE installers 14.Energy suppliers (fuel poverty schemes (Digital Economy Act 2017) 15.Darent Valley Hospital 16.IChoosr 17.BRE	N/A	N/A	Pentana – Cloud based – retention only Secure Waste Disposal - no processing - Kent & Medway Information Sharing Agreement Aran Services Limited (LA ECO Flexibility Eligibility Programme) Peabody (Handyperson Scheme) iChoosr (collective switching scheme) Kent & Medway Sustainable Energy Partnership – Kent Warm Homes Framework Kent & Medway Fire & Rescue Authority Fire Safety Protocol Contracts for Works in default/emergency remedial action SGN First Time Gas Central Heating Agreement	Pentana - BS ISO/IEC 27001:2013 compliant Secure Waste Disposal – confidentiality clause in contract KMISA - compliant Aran Services Ltd - compliant Peabody iChoosr – compliant Kent Warm Homes Framework – compliant KFRS - Protocol to be reviewed by KFRS Works in default etc. – contract provisions to be reviewed SGN - compliant	N/A	N/A	YES –HIGH – risk score 9

PROPERTY & VALUATION SERVICES - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIA	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal/archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held manually and/or on electronic systems (including mobile devices)	Children (under 13) – parental consent normally required
Internal Services	Head of Legal Services	Procedure/guidance on property acquisition and disposals	Applicable if policy or strategies have privacy implications	Supersedes previous version	Common Practice	Archive	No	N/A	No	N/A	Electronic – Council computer/laptop – intranet-website	N/A
Internal Services	Head of Legal Services	Lease & Assignments Register – property details, lease terms, assignments etc.	N/A	6 years from date of closure	Common Practice	Secure disposal	Yes (identifiable natural persons only) - name, address, contact details	Performance of a contract	No	N/A	Paper copy & electronic - Idox/UNIFORM	
Internal Services	Head of Legal Services	The process of acquiring land & property including through auctions – case file material	N/A	6 years from date of closure (excluding completed lease, licences etc. & other documents considered important for future reference)	Common Practice	Secure disposal	Yes (identifiable natural persons only) - name, address, contact details	Performance of a contract/taking steps preparatory to such a contract	No	N/A	Paper copy & electronic in Idox/UNIFORM	N/A
Internal Services	Head of Legal Services	The process of valuing land & property – case file material	N/A	12 years from date of closure (excluding valuation & other documents considered important for future reference)	Common Practice	Secure disposal	Yes (identifiable natural persons only) – name, address, contact details	Performance of a contract/taking steps preparatory to such a contract	No	N/A	Paper copy & electronic - Idox/UNIFORM	N/A
Internal services	Head of legal Services	The process of disposing of council land & property including through auctions – case file material	N/A	6 years from date of closure (excluding completed documents considered important for future reference)	Common Practice	Secure disposal	Yes (identifiable natural persons only) – name, address, contact details	Performance of a contract/taking steps preparatory to such a contract	No	N/A	Paper copy & electronic - Idox/UNIFORM	N/A
Internal Services	Head of Legal Services	Rent reviews – case file material	N/A	6 years from date of closure	Common Practice	Secure disposal	Yes (identifiable natural persons only) – name, address, contact details	Performance of a contract/taking steps preparatory to such a contract	No	N/A	Paper copy & electronic - Idox/UNIFORM	N/A

PROPERTY & VALUATION SERVICES - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

Strategic Directorate	Information Asset Owner(s)	Record/Information Description	DPIA	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal/archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held manually and/or on electronic systems (including mobile devices)	Children (under 13) – parental consent normally required
Internal Services	Head of Legal Services	Leased renewals	N/A	6 years from end of lease (excluding completed lease, & other documents considered important for future reference)	Common Practice	Secure disposal	Yes (identifiable natural persons only) – name, address, contact details	Performance of a contract/taking steps preparatory to such a contract	No	N/A	Paper copy in Deed Room &/or electronically (Idox/ UNIFORM)	N/A
Internal services	Head of legal Services	Premises files - floor plans, and other records	N/A	Life of Council ownership plus a minimum of 6 years	Common Practice	Archive	Yes (identifiable natural persons only) – name, address, contact details	Performance of a contract/taking steps preparatory to such a contract	No	N/A	Paper copy &/or electronically (Idox)/ UNIFORM	N/A
Internal Services	Head of Legal Services	Correspondence (general) – emails, letters, memos etc.	N/A	1 year unless considered important for future reference	Common Practice	Secure disposal	Yes (identifiable natural persons only) – name, address, contact details	In accordance with the lawful bases set out in this IAR	No	N/A	Paper copy/ Electronic/ Idox	N/A
Internal Services	Head of Legal Services	Valuations - case file material – instructions, reports etc.	N/A	End of use of property + 12 years	Common Practice	Secure disposal	Yes (identifiable natural persons only) – name, address, contact details	Performance of a contract/taking steps preparatory to such a contract	No	N/A	Paper copy &/or electronic in Idox	N/A

PROPERTY & VALUATION SERVICES - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

Strategic Directorate	Information Asset Owner(s)	Record/Information Description	DPIA	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal/archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held manually and/or on electronic systems (including mobile devices)	Children (under 13) - parental consent normally required
Internal Services	Head of Legal Services	Performance Indicators – for the legal services function	N/A	If a performance indicator is no longer required, deactivate and archive the indicator and delete from Pentana after 1 year	Common Practice	Disposal	No	N/A	No	N/A	(Anonymised) Electronically on Pentana	N/A

PROPERTY & VALUATION SERVICES - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

TECHNICAL & ORGANISATIONAL SECURITY MEASURES

Strategic Directorate	Information Asset Owner	IT Systems	Security Measures
Internal Services	I.C.T. Manager	Idox and department computers and laptops/internet /intranet /UNIFORM – maintenance and administration	Password administration, data encryption, implementation of PSN based email services, IT services contingency planning, firewall barriers to hackers, virus protection software, full back-up, rescue disks, security audits, regular testing, assessing and evaluating the effectiveness of technical and organisational measures for ensuring the security of the processing, corporate guidance on organisational/security measure, DPIAs, DPA contract provisions
Internal Services	Policy & Corporate Support Manager	Pentana - maintenance and administration	BS ISO/IEC 27001:2013 compliant
Internal Services	Head of Legal Services	Idox/Pentana/Intranet/Internet and computers and laptops/ UNIFORM – input of property and valuations data	Use of passwords, ISAs, appropriate contract clauses, use of PSN based email services, clear desk policy, departmental contingency planning, data retention, training, monitor screen position, physical security methods (e.g. locked cabinets), visitor passes, anonymisation, pseudonymisation, DPIAs, operational risk assessment, DPA contract provisions Dedicated IP address, up-to-date encryption protocols etc.
External Services	Enforcement & Regulatory Services Manager	CCTV – maintenance and administration	A key part of the Council's security setup
Internal Services	Head of Legal Services	Disaster recovery	See Business Continuity Plan

PROPERTY & VALUATION SERVICES - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

CONSENT, OUTSIDE EEA TRANSFERS, DATA PROCESSOR, MARKETING, PROFILING AND RISKS

Categories of data subjects	Recipients of personal/sensitive data	If lawful basis for processing is CONSENT -is procedure in place for explicit consent and withdrawal of consent	Outside EEA Transfers YES/NO –if yes - check contractual requirements	Data Processor (i.e. processing undertaken by a third party under contract) & ISAs	Data Processor Contract Checked - to be varied to incorporate 2018 DPA requirements	Marketing	Profiling	Risk category (to be mapped in accordance with the Council's corporate/strategic risk impact table) Operational Risk Register updated – YES/NO
Identifiable natural persons such as leaseholders, tenants, complainants, applicants, employees, service users etc.	1.Council department(s) 2.Courts/tribunals etc. 3.Ombudsman 4.Councillors/Member of Parliament 5.HM Land Registry 6.Lands Tribunal (First-tier Tribunal (Property Chamber) and Upper Tribunal (Lands Chamber)) 7.Government agencies 8.other local authorities 9.Surveyors/valuers, lawyers and other professionals who may be acting on the Council's behalf	N/A	N/A	Pentana – Cloud based – retention only Secure Waste Disposal - no processing SDC bulk printing – no processing Kent & Medway ISA Gen2 - Professional Estates Contract	Pentana - BS ISO/IEC 27001:2013 compliant Secure Waste Disposal – confidentiality clause in contract SDC bulk printing SLA –includes confidentiality requirements K&MISA – compliant Gen2 contract - compliant	N/A	N/A	YES – low - 2

PROPERTY INFORMATION - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

Strategic Directorate	Information Asset Owner	Record/ Information Description	DPIA ¹	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal/archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held manually and/or on electronic systems (including mobile devices)	Children (under 13) – parental consent normally required
Internal Services	Property Information Manager	Procedure/guidance - on a range of matters	Applicable if policy or strategies have privacy implications	Supersedes previous version	Common Practice	Supersedes previous version	No	N/A	No	N/A	Electronic – Council computer/laptop – intranet-website	N/A
Internal Services	Property Information Manager	Street, Land and Property address records	N/A	Permanent	Common Practice	Archive	Yes – unique identifiers and addresses	Public interest task/legal obligation compliance – Sections 64 and 65 of the Towns Improvement Clauses Act 1847 (for numbering of properties and street naming) Section 21 of the Public Health Act Amendment Act 1907 (for alteration of names of streets) Sections 17, 18 and 19 of the Public Health Act of 1925	No	N/A	Paper copy &/or electronically in Idox/Uniform/GIS	N/A
Internal Services	Property Information Manager	GIS data	N/A	Permanent unless instructed otherwise by client departments	Common Practice	Deletion of electronic records, secure disposal of paper	No	N/A	No	N/A	Paper copy &/or electronically in GIS	N/A
Internal Services	Property Information Manager	Correspondence (general) – emails, letters, memos etc.	N/A	1 year unless considered important for future reference	Common Practice	Secure disposal	Yes (identifiable natural persons only) – name, address, contact details	Public interest task – in accordance with the legislation referred to in this IAR	No	N/A	Paper copy &/or electronically	N/A

¹ When building new IT systems for storing or accessing personal data, developing legislation, policy or strategies that have privacy implications, embarking on a data sharing initiative; or using data for new purposes, evaluation or scoring, including profiling, automated decision-making, systematic monitoring of individuals, processing sensitive data, processing data on a large scale, matching or combining datasets, processing data concerning vulnerable data subjects, innovative use or application of technological or organisational solutions, data transfer across borders outside the EU, when the processing in itself “prevents data subjects from exercising a right or using a service or a contract”

PROPERTY INFORMATION - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

TECHNICAL & ORGANISATIONAL SECURITY MEASURES

Strategic Directorate	Information Asset Owner	IT Systems	Security Measures
Internal Services	I.C.T. Manager	Idox/UNIFORM/GIS and department computers and laptops/Internet/ Intranet – maintenance and administration	Password administration, data encryption, implementation of PSN based email services, IT services contingency planning, firewall barriers to hackers, virus protection software, full back-up, rescue disks, security audits, regular testing, assessing and evaluating the effectiveness of technical and organisational measures for ensuring the security of the processing, corporate guidance on organisational/security measure, DPIAs
Internal Services	Property Information Manager	Idox/UNIFORM/GIS, computers and laptops/Internet/ Intranet - - input of data	Use of passwords
Internal Services	Property Information Manager in consultation with IT Services	Business recovery	See Business Plan
External Services	Enforcement & Regulatory Services Manager	CCTV – maintenance and administration	A key part of the Council's security set up

CONSENT, OUTSIDE EEA TRANSFERS, DATA PROCESSOR AND RISKS

Categories of data subjects	Recipients of personal data	If lawful basis for processing is CONSENT -is procedure in place for explicit consent and withdrawal of consent	Outside EEA Transfers YES/NO –if yes - check contractual requirements	Data Processor (i.e. processing undertaken by a third party under contract)	Data Processor Contract Checked - to be varied to incorporate 2018 DPA requirements	Risk category (to be mapped in accordance with the Council's corporate/strategic risk impact table) Operational Risk Register updated – YES/NO
Identifiable persons such as natural service users etc.	1.Council departments	N/A	N/A	Secure Waste Disposal - no processing	Secure Waste Disposal – confidentiality clause in contract	Low score – 2 No

Electoral Registration	Information Asset Owner	Record/Information Description	Retention Period	Statutory or Common Practice	Action at end of retention e.g. disposal or archive	Personal Data	Lawful Basis for Processing Personal Data	Sensitive Personal Data	Lawful Basis for Processing Sensitive Personal Data	Children (under 13) - parental consent required	Held manually and/or on electronic systems (including mobile devices) - list systems/devices	Recipients (including internal Council departments) of personal/sensitive data	Data Processor (i.e. processing undertaken by an external organisation under contract)	Data Processor Contract/ISA Checked - to be varied to incorporate GDPR requirements & ISAs
Electoral Registration Officer Civic Centre Home Gardens Dartford Kent DA11 1DR	ELECTORAL PROCESS													
ELECTORAL REGISTER														
Returning Officer (Local Returning Officer/(Acting) Returning Officer) Police Area Returning Officer	Electoral Services Manager	Nomination Register and Alterations	Produced upon request	Common Practice	Archived	Yes - name, address, date of birth	ditto above	Yes -nationality	Substantial public interest - Representation of the People Act 1983 - Representation of the People Regulations 2001 - Legal obligation	No	Manually/Electronically (PDF & Excel)	Returning Officers Candidates	N/A	N/A
ELECTIONS														
Returning Officer (Local Returning Officer/(Acting) Returning Officer) Police Area Returning Officer	Electoral Services Manager	All Ballot papers	12 months from close of poll	Statutory	Secure disposal	Yes-name, address, date of birth	Public interest task - Representation of the People Act 1983 - Representation of the People Regulations 2001 - Legal obligation	No	N/A	No	Manually	N/A	N/A	N/A
		Corresponding Number Lists	12 months from close of poll	Statutory	Secure disposal	Yes -name, address, date of birth	Public interest task - Representation of the People Act 1983 - Representation of the People Regulations 2001 - Legal obligation	No	N/A	No	Manually	N/A	N/A	N/A
		Declaration of results	12 months from date of election (no retention online)	Common Practice	Secure disposal	Yes- name, address	Public interest task - Representation of the People Act 1983 - Representation of the People Regulations 2001 - Legal obligation	No	N/A	No	Manually/Electronic (Modern.Gov)	Public Inspection	N/A	n/a
		Notices relating to an Election	Until deadline for an election has passed	Common Practice	Secure disposal	Yes - name, address, date of birth	Public interest task - Representation of the People Act 1983 - Representation of the People Regulations 2001	No	N/A	No	PDF	Public Inspection	N/A	N/A
		Absent Voter Lists	12 months from close of poll	Statutory	Secure disposal	Yes - name, address, date of birth	Public interest task - Representation of the People Act 1983 -Representation of the People Regulations 2001 - Legal obligation	No	N/A	No	Manually / Electronic (PDF)	Political Parties Public Inspection Electoral Commission Police Forces Security Agencies	N/A	N/A
		List of voters with disabilities assisted by companions	12 months from close of poll	Statutory	Secure disposal	Yes-name, address, date of birth	Public interest task - Representation of the People Act 1983 - Representation of the People Regulations 2001 - Legal obligation	No	N/A	No	Manually	N/A	N/A	N/A
		Return of Election Expenses	2 years from receipt (Parliamentary & Local) 1 Year from receipt (European Parliamentary and Parish)	Statutory	Return to Election Agent or Secure disposal	Yes - name, address, date of birth	Public interest task - Representation of the People Act 1983 - Representation of the People Regulations 2001 - Legal obligation	No	N/A	No	Manually/ Electronic (PDF)	Public Inspection Electoral Commission	N/A	N/A
		Poll Card Data	12 months from close of poll	Common Practice	Archived	Yes - name, address, date of birth	Public interest task - Representation of the People Act 1983 - Representation of the People Regulations 2001 - Legal obligation	No	N/A	No	Electronic (Excel)	Print UK (subject to contract review)	Print UK	BS ISO/IEC 27001:2013
		Postal Vote Data	12 months from close of poll	Common Practice	Archived	Yes - name, address, date of birth	Public interest task - Representation of the People Act 1983 - Representation of the People Regulations 2001 - Legal obligation	No	N/A	No	Electronic (Excel)	Print UK (subject to contract review)	Print UK	BS ISO/IEC 27001:2013
		Nomination Papers	12 months from close of poll	Statutory	Secure Disposal	Yes -name, address, date of birth	Public interest task - Representation of the People Act 1983 - Representation of the People Regulations 2001 - Legal obligation	No	N/A	No	Manually	Notice Ballot Paper	N/A	N/A
		Candidate's home address form (Parliamentary & Local)	Next working day following 21 calendar days of declaration of result unless an election petition is received	Statutory	Secure disposal	Yes -name, address, date of birth	Public interest task - Representation of the People Act 1983- Representation of the People Regulations 2001 - Legal obligation	No	N/A	No	Manually	Public Inspection Ballot Paper	N/A	N/A
		Record of Deposits	12 months from close of poll	Common Practice	Secure disposal	Yes - name, address, bank details	Public interest task - Representation of the People Act 1983- Representation of the People Regulations 2001 - Legal obligation	No	N/A	No	Electronic	N/A	N/A	N/A
		Car Registrations -Presiding Officers	Four weeks following completion of the Count	Common Practice	Secure disposal	Yes- car registration numbers	Public interest task - Representation of the People Act 1983 - Representation of the People Regulations 2001-Legal obligation	No	N/A	No	Electronic (Excel)/Manual	CEO/Centre Circle	N/A	N/A
		Employment Information	Until provided to Payroll	Common Practice	Secure disposal	Yes - name, address, date of birth, NI number, email address	Necessary for the performance of a contract with data subject	Yes -nationality	Substantial public interest - DPA 2018 Schedule 1, Part 1 condition - contract obligations	Yes	Manually/Electronic	Shared Payroll service	Mid Kent Services	Shared Payroll Service Collaboration Agreement
ABSENT VOTING														
Returning Officer (Local Returning Officer/(Acting) Returning Officer) Police Area Returning Officer	Electoral Services Manager	Election Postal Data	4 weeks after election, unless an election petition	Common Practice	Archived	Yes - name, address, date of birth, NI number, email address	Public interest task - Representation of the People Act 1983 - Representation of the People Regulations 2001 - Legal obligation	No	N/A	No	Electronically (Excel & AventuraGuard)	IT	N/A	N/A

SERVICE COMPLAINTS' PROCESS - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIA ¹	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal/archive	Personal Data ²	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held manually and/or on electronic systems (including mobile devices)	Children (under 12) – parental consent normally required
Internal Services	Corporate Complaints Officer	Procedure/guidance for dealing with service complaints	Applicable if policy or strategies have privacy implications	Supersedes preceding version	Common Practice	Archive	No	N/A	No	N/A	Electronic	No
Internal Services	Corporate Complaints Officer	Stage One – case file material other than record of complaint & decision	N/A	Current year + 1 year after case closed unless exceptional circumstances require longer retention e.g. pending court case	Common Practice	Secure disposal	Yes – name, address etc., nature of complaint	Public interest task – see legislation referred to in service specific IARs	Yes – health	Substantial public interest - see legislation referred to in service specific IARs	Paper copy &/or electronically on Pentana & CRM	No
Internal Services	Corporate Complaints Officer	Stage Two - case file material other than record of complaint & decision	N/A	2 years from date of case closure unless exceptional circumstances require longer retention e.g. pending court case	Common Practice	Secure disposal	Yes –name, address etc., nature of complaint	Public interest - task – see legislation referred to in service specific IARs	Yes	Substantial public interest - see legislation referred to in service specific IARs	Paper copy &/or electronically on Pentana & CRM	No

¹ When building new IT systems for storing or accessing personal data, developing legislation, policy or strategies that have privacy implications, embarking on a data sharing initiative; or using data for new purposes, evaluation or scoring, including profiling, automated decision-making, systematic monitoring of individuals, processing sensitive data, processing data on a large scale, matching or combining datasets, processing data concerning vulnerable data subjects, innovative use or application of technological or organisational solutions, data transfer across borders outside the EU, when the processing in itself “prevents data subjects from exercising a right or using a service or a contract

SERVICE COMPLAINTS' PROCESS - INFORMATION ASSET REGISTER& RECORD OF PROCESSING ACTIVITY (ROPA)

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIA	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal/archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held manually and/or on electronic systems (including mobile devices)	Children (under 12) - parental consent normally required
Internal Services	Corporate Complaints Officer	Records of complaints & decisions	N/A	Current year after case closed + 4 years	Common Practice	Secure disposal	Yes – name, address, nature of complaint etc.	Public interest task - see legislation referred to in service specific IARs	Yes - health	Substantial public interest – see legislation referred to in service specific IARs	Paper copy &/or electronically on Mod Gov & Pentana	N/A
Internal Services	Corporate Complaints Officer	Housing Ombudsman & Local Government & Social Care Ombudsman - complaints received and outcomes	N/A	Current year + 1 year after case closed unless exceptional circumstances require longer retention e.g. pending court case	Common Practice	Secure disposal	Yes – name, address, nature of complaint etc.	Legal obligation compliance – Local Government Act 1974	Yes - health	Legal obligation compliance – Local Government Act 1974	Paper copy &/or electronically on Pentana	N/A
Internal Services	Head of Legal Services	Information Commissioner - complaints received and outcomes	N/A	Current year + 1 year after case closed	Common Practice	Secure disposal	Yes – name, address, nature of complaint etc.	Legal obligation compliance – Freedom of Information Act 2000	No	N/A	Paper copy &/or electronically on Pentana	N/A
Internal Services	Corporate Complaints Officer Member Services Manager	Anonymised statistical information on complaints received and outcomes reported to Audit Board	N/A	Date reported + 6 years	Statutory (for minutes & background information)	Archive electronically	No	N/A	No	N/A	Paper copy &/or electronically on Mod Gov & Pentana	N/A
Internal Services	Corporate Complaints Officer Member Services Manager	Anonymised statistical information on complaints received by the LGO & ICO and outcomes reported to Cabinet/Audit Board	N/A	Date reported + 6 years	Statutory (for minutes & background information)	Archive electronically	No	N/A	No	N/A	Paper copy &/or electronically on Mod Gov & Pentana	N/A

SERVICE COMPLAINTS' PROCESS - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIA	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal/archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held manually and/or on electronic systems (including mobile devices)	Children (under 12) - parental consent normally required
Internal Services	Corporate Complaints Officer	Compliments – customer comments	N/A	Current year + 1 year	Common Practice	Secure disposal	Yes	Public interest task	No	N/A	Paper copy &/or electronically on Mod Gov & Pentana	N/A
Internal Services	Corporate Complaints Officer Member Services Manager	Collection of anonymised data relating to compliments reported to the Audit Board	N/A	Date reported + 6 years	Statutory (for minutes & background information)	Disposal of paper copies Archive electronically (minutes & background information)	No	N/A	No	N/A	Paper copy &/or electronically on Mod Gov & Pentana	N/A
Internal Services	Corporate Complaints Officer Member Services Manager	Collection of anonymised data of complainants' diversity information reported to the Audit Board	N/A	Date reported + 6 years	Statutory (for minutes & background information)	Disposal of paper copies Archive electronically (minutes & background information)	No	N/A	Yes- but anonymised	N/A – anonymised data outside scope of DPA	Paper copy &/or electronically on Mod Gov & Pentana	N/A

SERVICE COMPLAINTS' PROCESS - INFORMATION ASSET REGISTER& RECORD OF PROCESSING ACTIVITY (ROPA)

TECHNICAL & ORGANISATIONAL SECURITY MEASURES

Strategic Directorate	Information Asset Owner	IT Systems	Security Measures
Internal Services	I.C.T. Manager	Idox/Computer systems – maintenance and administration	Password administration, data encryption, implementation of PSN based email services, IT services contingency planning, firewall barriers to hackers, virus protection software, full back-up, rescue disks, security audits, regular testing, assessing and evaluating the effectiveness of technical and organisational measures for ensuring the security of the processing, corporate guidance on organisational/security measure, DPIAs
Internal Services	I.C.T. Manager	CRM - maintenance & administration	
Internal Services	Corporate Complaints Officer	Pentana – input of corporate complaints data	Password administration
Internal Services	Policy & Corporate Support Manager	Pentana – maintenance & administration	BS ISO/IEC 27001:2013 compliant
External Services	Enforcement & Regulatory Services Manager	CCTV	A key part of the Council's security setup

SERVICE COMPLAINTS' PROCESS - INFORMATION ASSET REGISTER& RECORD OF PROCESSING ACTIVITY (ROPA)

CONSENT, OUTSIDE EEA TRANSFERS, DATA PROCESSOR, MARKETING AND RISKS

Categories of data subject	Recipients of personal/sensitive data	If lawful basis for processing is CONSENT -is procedure in place for explicit consent and withdrawal of consent	Outside EEA Transfers YES/NO –if yes – have you checked contractual requirements?	Data Processor (i.e. processing undertaken by a third party under contract) & ISAs	Data Processor Contract Checked - to be varied to incorporate 2018 DPA requirements	Marketing	Portability	Risk category (to be mapped in accordance with the Council's corporate/strategic risk impact table) Operational Risk Register updated YES/NO
Identifiable natural persons such as leaseholders, tenants, complainants, applicants, service users etc.	1.Council department(s) 2.Ombudsmen 3.Contractors 4.Member of Parliament 5.Councillors	N/A	N/A	Pentana – Cloud based – retention only Secure Waste Disposal - no processing SDC bulk printing – no processing	Pentana - BS ISO/IEC 27001:2013 compliant Secure Waste Disposal – confidentiality clause in contract SDC bulk printing SLA – confidentiality clause in contract	N/A	N/A	Low - 2 (sensitive data rarely processed at collection point)

STREET NAMING & NUMBERING - INFORMATION ASSET REGISTER& RECORD OF PROCESSING ACTIVITY (ROPA)

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIA ¹	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal/archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held manually and/or on electronic systems (including mobile devices)	Children (under 13) – parental consent normally required
Internal Services	Property Information Manager	Procedure/guidance on a range of matters	Applicable if policy or strategies have privacy implications	Supersedes preceding version	Common Practice	Superseded	No	N/A	No	N/A	Electronic – Council computer/laptop – intranet- website	N/A
Internal Services	Property Information Manager	Online Address Request Form – submitted by developers to request street naming & numbering for new properties	N/A	Permanent	Common Practice	Archive	Yes (identifiable natural persons only) - name, address, contact details	Public Interest task – Public interest legal obligation and compliance For names of streets Public Health Act 1925 (sections 17-19)	No	N/A	Paper copy until case completed then electronically in Idox/UNIFORM	N/A
Internal Services	Property Information Manager	SNN Paperwork – correspondence, draft Cabinet reports, plans, number schedules, naming notices etc.	N/A	Permanent	Common Practice	Archive	Yes (identifiable natural persons only) - name, address, contact details	Public interest task –ditto above	No	N/A	Paper copy until case completed then electronically in Idox/UNIFORM	N/A

¹ When building new IT systems for storing or accessing personal data, developing legislation, policy or strategies that have privacy implications, embarking on a data sharing initiative; or using data for new purposes, evaluation or scoring, including profiling, automated decision-making, systematic monitoring of individuals, processing sensitive data, processing data on a large scale, matching or combining datasets, processing data concerning vulnerable data subjects, innovative use or application of technological or organisational solutions, data transfer across borders outside the EU, when the processing in itself “prevents data subjects from exercising a right or using a service or a contract”

STREET NAMING & NUMBERING - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIA ²	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal/archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held manually and/or on electronic systems (including mobile devices)	Children (under 13) – parental consent normally required
Internal Services	Property Information Manager	Correspondence (general) – emails, letters, memos etc.	N/A	1 year unless considered important for future reference	Common Practice	Secure disposal	Yes (identifiable natural persons only) - name, address, contact details	Public interest task – in accordance with the legislation referred to in this IAR	No	N/A	Paper copy /electronic	N/A

TECHNICAL & ORGANISATIONAL SECURITY MEASURES

Internal Services	Property Information Manager	Idox and computers and laptops - -- input of data – the SNN function	Use of passwords, ISAs, appropriate contract clauses, - use of PSN based email services, clear desk policy, departmental contingency planning, data retention, training, monitor screen position, physical security methods (e.g. locked cabinets), visitor passes, anonymisation, pseudonymisation, DPIAs, operational risk assessment
Internal Services	Policy & Corporate Support Manager	Pentana – maintenance & administration	BS ISO/IEC 27001:2013 compliant
Internal Services	Property Services Manager	Pentana – input of street naming data PIs	Password administration
Internal Services	Property Services Manager in consultation with IT Services support	Disaster recovery	See Business Continuity Plan
External Services	Enforcement & Regulatory Services Manager	CCTV – maintenance and administration	A key part of the Council's security setup

² When building new IT systems for storing or accessing personal data, developing legislation, policy or strategies that have privacy implications, embarking on a data sharing initiative; or using data for new purposes, evaluation or scoring, including profiling, automated decision-making, systematic monitoring of individuals, processing sensitive data, processing data on a large scale, matching or combining datasets, processing data concerning vulnerable data subjects, innovative use or application of technological or organisational solutions, data transfer across borders outside the EU, when the processing in itself “prevents data subjects from exercising a right or using a service or a contract”

STREET NAMING & NUMBERING - INFORMATION ASSET REGISTER& RECORD OF PROCESSING ACTIVITY (ROPA)

CONSENT, OUTSIDE EEA TRANSFERS, DATA PROCESSOR, MARKETING AND RISKS

Categories of data subjects	Recipients of personal data	If lawful basis for processing is CONSENT -is procedure in place for explicit consent and withdrawal of consent	Outside EEA Transfers YES/NO –if yes - check contractual requirements	Data Processor (i.e. processing undertaken by a third party under contract)	Data Processor Contract Checked - to be varied to incorporate 2018 DPA requirements	Marketing	Risk category (to be mapped in accordance with the Council's corporate/strategic risk impact table) Operational Risk Register updated – YES/NO
Identifiable natural persons such service users etc.	1.Council departments	N/A	NO	Secure Waste Disposal - no processing	Secure Waste Disposal – confidentiality clause in contract	N/A	Low score – 2 No

WASTE & RECYCLING MANAGEMENT - INFORMATION ASSET REGISTER& RECORD OF PROCESSING ACTIVITY (ROPA)

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIA ¹	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal/archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held manually and/or on electronic systems (including mobile devices)	Children (under 13) – parental consent normally required
External Services	Waste and Parks Manager	Procedures and guidance -on a range of service matters	N/A	Supersedes preceding version	Common Practice	Superseded	No	N/A	No	N/A	Electronic	N/A
External Services	Waste and Parks Manager	Refuse Collection and Street Cleansing – successful tender - case file material – tender, contracts and ancillary correspondence etc.	N/A	6 year for contracts under hand 12 years for contracts under seal	Common Practice	Secure Disposal	Yes- (identifiable natural persons only) – name , address, contact details, financial data	Public interest task pursuant to Sections 45 and 89 Environmental Protection Act 1990 (as applicable)	No	N/A	Electronic - Idocs	N/A
External Services	Waste and Parks Manager	Refuse Collection and Street Cleansing - contract management – correspondence etc.	N/A	6 year for contracts under hand plus 1 year 12 years for contracts under seal plus 1 year	Common Practice	Secure Disposal	Yes - (identifiable natural persons only) - name , address, contact details, financial data	Public interest task pursuant to Sections 45 and 89 Environmental Protection Act 1990 (as applicable)	No	N/A	Paper copy &/or electronic - UNIFORM	N/A
External Services	Waste and Parks Manager	Refuse Collection and Street Cleansing transfer notes and related documents	N/A	6 year for contracts under hand plus 1 year 12 years for contracts under seal plus 1 year	Common Practice	Secure Disposal	No	N/A	No	N/A	Paper copy	N/A

¹ When building new IT systems for storing or accessing personal data, developing legislation, policy or strategies that have privacy implications, embarking on a data sharing initiative; or using data for new purposes, evaluation or scoring, including profiling, automated decision-making, systematic monitoring of individuals, processing sensitive data, processing data on a large scale, matching or combining datasets, processing data concerning vulnerable data subjects, innovative use or application of technological or organisational solutions, data transfer across borders outside the EU, when the processing in itself “prevents data subjects from exercising a right or using a service or a contract

WASTE & RECYCLING MANAGEMENT - INFORMATION ASSET REGISTER& RECORD OF PROCESSING ACTIVITY (ROPA)

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIA	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal/archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held manually and/or on electronic systems (including mobile devices)	Children (under 13) - parental consent normally required
External Services	Waste and Parks Manager	Waste Collection data – domestic, bulky, clinical, controlled, commercial waste	N/A	2 years from date of last action	Common Practice	Secure Disposal	Yes - (identifiable natural persons only) - name , address, contact details	Public interest task pursuant to Section 45 Environmental Protection Act 1990 or performance of a contract (where applicable)	No	N/A	Paper copy &/or electronic - UNIFORM	N/A
External Services	Waste and Parks Manager	Routine Service Requests – correspondence etc.	N/A	3 years from date of closure unless exceptional circumstances require longer retention e.g. pending court case	Common Practice	Secure Disposal	Yes - (identifiable natural persons only) - name , address, contact details	Public interest task pursuant to Sections 45 and 49 Environmental Protection Act 1990) as applicable)	No	N/A	Electronic - UNIFORM	N/A
External Services	Waste and Parks Manager	Complaints – case file management – correspondence etc.	N/A	2 years from date of case closure unless exceptional circumstances require longer retention e.g. pending court case	Common Practice	Secure Disposal	Yes - (identifiable natural persons only) - name , address, contact details	Public interest task pursuant to Sections 45 and 49 Environmental Protection Act 1990 (as applicable)	No	N/A	Paper copy &/or electronically	N/A
External Services	Waste and Parks Manager	Local Government & Social Care Ombudsman – case file material - complaints received and outcomes	N/A	1 year from date of case closure unless exceptional circumstances require longer retention e.g. pending court case	Common Practice	Secure Disposal	Yes - (identifiable natural persons only) - name , address, contact details	Public interest task – Local Government Act 1974	Yes- health data, offences (including alleged offences) etc.	Substantial public interest task – Section 26(5) Local Government Act 1974	Paper copy &/or electronic - Idocs	N/A
External Services	Waste and Parks Manager	Abandoned Vehicles – case file material, notices etc.	N/A	2 years from date of case closure unless exceptional circumstances require longer retention e.g. pending court case	Common Practice	Secure Disposal	Yes - (identifiable natural persons only) - name , address, contact details, car	Public interest task pursuant to Sections 4 and 4A of the Refuse Disposal (Amenity) Act 1978	No	N/A	Paper copy &/or electronically	N/A

WASTE & RECYCLING MANAGEMENT - INFORMATION ASSET REGISTER& RECORD OF PROCESSING ACTIVITY (ROPA)

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIA	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal/archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held manually and/or on electronic systems (including mobile devices)	Children (under 13) - parental consent normally required
External Services	Waste and Parks Manager	Performance Indicators - statistical information (anonymised)	N/A	If a performance indicator is no longer required, deactivate and archive the indicator and delete from Pentana after 1 year	Common Practice	Disposal	No	N/A	No	N/A	Electronic - Pentana	N/A
External Services	Waste and Parks Manager	Correspondence (general) – emails, letters, memos etc.	N/A	1 year unless considered important for future reference	Common Practice	Secure Disposal	Yes – (identifiable natural persons only) - name , address, contact details	Public interest task – pursuant to legislation referred to in this IAR	No	N/A	Paper copy &/or electronically	N/A

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIA	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal/archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held manually and/or on electronic systems (including mobile devices)	Children (under 18) -
External Services	Waste and Parks Manager	Safeguarding Referrals (children & adults at risk)	Yes	Delete immediately following receipt by KCC	Common Practice	Secure Disposal	Yes – (identifiable natural persons only) - name , address, contact details	Public interest task/legal obligation – Children Act 2004/Care Act 2014 Statutory Guidance - Working Together to Safeguard Children Children	Yes – health data, offences (including alleged offences)	Substantial public interest task/legal obligation – Children Act 2004/Care Act 2014 - Working Together to Safeguard Children Care & Support	Paper copy &/or electronic	Yes

WASTE & RECYCLING MANAGEMENT - INFORMATION ASSET REGISTER& RECORD OF PROCESSING ACTIVITY (ROPA)

								Care & Support Statutory Guidance		Statutory Guidance		
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TECHNICAL & ORGANISATIONAL SECURITY MEASURES

Strategic Directorate	Information Asset Owner	IT Systems	Security Measures
Internal Services	I.C.T. Manager	Idocs/UNIFORM/ Academy and department computers and laptops/Internet/ Intranet – maintenance and administration	Password administration, data encryption, implementation of PSN based email services, IT services contingency planning, firewall barriers to hackers, virus protection software, full back-up, rescue disks, security audits, regular testing, assessing and evaluating the effectiveness of technical and organisational measures for ensuring the security of the processing, corporate guidance on organisational/security measure, DPIAs
Internal Services	Policy & Corporate Support Manager	Pentana – maintenance & administration	BS ISO/IEC 27001:2013 compliant
Internal Services	Customer Services Manager	On-line payments (hosted by Capita	PCIDSS compliant
External Services	Waste and Parks Manager	Disaster recovery	See Business Continuity Plan
External Services	Waste and Parks Manager	Idocs/UNIFORM /Pentana and computers and laptops/Internet/ Intranet - input of waste management data	Use of passwords
External Services	Enforcement & Regulatory Services Manager	CCTV -administration and maintenance	A key part of the Council's security set up

WASTE & RECYCLING MANAGEMENT - INFORMATION ASSET REGISTER& RECORD OF PROCESSING ACTIVITY (ROPA)

CONSENT, OUTSIDE EEA TRANSFERS, DATA PROCESSOR, MARKETING AND RISKS

Categories of data subject	Recipients of personal data	If lawful basis for processing is CONSENT -is procedure in place for explicit consent and withdrawal of consent	Outside EEA Transfers –if yes – have you checked contractual requirements?	Data Processor (i.e. processing undertaken by a third party under contract) & ISAs	Data Processor Contract Checked - to be varied to incorporate 2018 DPA requirements	Marketing	Portability	Risk category (to be mapped in accordance with the Council's corporate/strategic risk impact table) Operational Risk Register updated YES/NO
Identifiable natural persons such as leaseholders, tenants, complainants, applicants, service users etc.	1.Council department(s) 2.Ombudsman 3.Contractors 4.MP 5.Councillors 6.KCC 7.Utilities (information to and received from) (Digital Economy Act 2017 – fuel poverty provisions)	N/A	N/A	Pentana – Cloud based – retention only Secure Office Waste Disposal - no processing Urbaser Ltd – waste and recycling	Pentana - BS ISO/IEC 27001:2013 compliant Secure Office Waste Disposal – confidentiality clause in contract Waste & recycling contract - compliant	N/A	N/A	YES – LOW- risk score 2