

Apuldram Parish Meeting

Data Protection Impact Assessment (DPIA)

1. Purpose

Management of Parish Council Governance, Public Engagement, and Administrative Records

2. Purpose of the DPIA

This DPIA identifies and assesses data protection risks arising from the Council's collection and processing of personal data required to carry out statutory functions, including handling correspondence, planning consultations, financial administration, and website communication.

3. Description of the Processing

3.1 Nature of Processing

Apuldram Parish Meeting processes personal data for purposes including responding to enquiries, statutory records, website communication, newsletter or mailing lists, planning consultations, supplier contracts, and governance.

3.2 Categories of Personal Data

Residents: names, contact details, opinions, complaints.

Members and Clerk: contact info, declarations.

Suppliers: contact and bank details.

Website users: names, emails, IP addresses.

3.3 Categories of Data Subjects

Residents, website visitors, Members, the Clerk, auditors, contractors.

3.4 Processing Activities

Collecting information via email, phone, post, in-person or website forms, storing data securely, publishing non-sensitive data online (e.g. minutes), retaining and disposing of records per schedule.

4. Lawful Basis for Processing

Public Task, Legal Obligation, Consent, Contract, Providing a Community Facility, Substantial Public Interest.

5. Data Flows

Internal: Clerk and Members. External: cloud email and document storage, website host, auditors, contractors.

6. Risks to Data Subjects

Risks include unauthorised access, accidental publication, data loss, third party misuse, and website breaches.

7. Risk Mitigation Measures

Technical controls include encryption, MFA, and backups. Organisational controls include training, redaction, and retention schedules.

Apuldram Parish Meeting uses dedicated email addresses for the Clerk and the Chair. This reduces the risk of personal data loss by preventing the use of unsecured personal email accounts. Regular data protection training is also provided to ensure Members and staff understand secure handling, recognition of phishing attempts, redaction, and appropriate retention practices.

8. Residual Risk Assessment

Residual risks are low or medium.

9. Data Retention

Minutes: permanent.

Financial records (including financial records associated with bookings: 6 years.

Payroll records (salary, allowances): 6 years

Insurance Schedules and Policy Documents 30 years

Correspondence: 1–3 years.

Planning applications: 3 years

Planning: consultation: + 1 year.

10. Data Subject Rights

Includes the right to be informed, access, rectification, restriction, objection, erasure.

11. DPIA Outcome

Processing is necessary and proportionate. No high residual risks remain.

12. Risk Assessment Table

Risk	Likelihood	Impact	Overall Risk
Unauthorised access to emails or documents	Medium	High	High
Accidental publication of personal data	Medium	High	High
Use of personal email instead of council email	Medium	High	High
Inadequate Staff/member training	Medium	Medium	Medium

Data loss due to inadequate backup	Low	High	Medium
Misuse of contact details by third parties	Low	Medium	Low
Website vulnerabilities	Medium	High	High
Incorrect payroll output (wrong salary)	Medium	Medium	Medium
Incorrect financial data entry or corruption	Medium	Medium	Medium
Supplier data	Low	High	Medium

13. Risk Mitigation Table

Risk	Mitigations
Unauthorised access	Encryption, MFA, secure laptop, strong passwords
Accidental publication	Redaction procedure, training, review process
Personal email/device use	Mandatory use of dedicated council email for Chair and Clerk
Data loss	Regular backups, secure cloud storage

Payroll calculation errors

Clerk/RFO cross-check; maintain audit trail

Incorrect financial data entry or corruption

Reconciliations, Clerk/RFO Checks, audit trails. Limited access and provider security compliance

14. Review and Monitoring

This policy is reviewed **biennially** or upon material changes in law or ICO guidance or when any new functions are proposed by the council.

Adopted by Council:

Minute Number:

Next Review:
changes)

(or sooner if law/guidance

Version: 1.0