**Policy & Communications GDPR Compliance**

**Date amended: 15/11/18**

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# Current tools outside of Office365 family

Using the following tools: Mailchimp, SurveyMonkey, Eventbrite, Dropbox.

These third parties will be considered data processors on our behalf and we need to have contracts in place with our processors which include standard GDPR terms. The Council that is the data controller and not individual services so there’s only the need for one agreement per supplier.

As a service area we will need individual **privacy notices per processing activity**. The following online guidance is available:

[Mailchimp](https://kb.mailchimp.com/accounts/management/about-mailchimp-the-eu-swiss-privacy-shield-and-the-gdpr)

[SurveyMonkey](https://www.surveymonkey.com/curiosity/surveymonkey-committed-to-gdpr-compliance/). We have a Data Processing [Agreement](http://intranet.carlisle.gov.uk/yourcouncil/teams/first/Shared%20Documents/Consultation%20and%20Surveys/Survey%20Monkey%20DPA.pdf) in place.

[Eventbrite](https://www.eventbrite.co.uk/support/articles/en_GB/Troubleshooting/eventbrite-eu-data-protection?lg=en_GB)

[Dropbox](https://www.dropbox.com/security/GDPR). or [We Transfer](https://wetransfer.zendesk.com/hc/en-us/articles/360000780226-WeTransfer-3-GDPR). A [Data Processing Agreement](http://intranet.carlisle.gov.uk/yourcouncil/teams/first/Shared%20Documents/Policy%20development/Information%20Governance/DPA_WeTransfer.pdf) is in place for WeTransfer.

# Privacy Impact Assessments

GDPR only applies to Personal Data, we have the following processing activity and datasets that this would apply to:

1. Information held – Personal Data included in surveys, using Survey Monkey
2. Information held – Personal Data included in Image Library records
3. Information held – Personal Data included in application for Community Right to Bid
4. Information held – Personal Data included in Emergency Plans and Business Continuity Plan
5. Information held – Personal Data included in We Transfer
6. Information held – Personal Data included in Community Asset Transfer

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|  | 1. **Information held – Personal Data included in surveys, using Survey Monkey.**
 |
| P1 – lawfulness - condition for processing | [x] 1 - Consent[ ]  2 - Necessary for performance of contract[ ]  3 – Compliance with legal obligation[ ]  4 – vital interests[ ]  5 – task carried out in public interest or exercise of official authority[ ]  6 – legitimate interests – |
| P1 - consent?Do we ask for consent? Right to withdrawDo we need it? Can we do it anyway?Opt in, not opt out | To increase the sample size, to meet our reporting thresholds, we may choose to include a prize draw for completed surveys.This requires:***Name, email contact and mobile or landline telephone number***, which makes the data personal. As the data set includes protected characteristics it would be deemed sensitive or special data.The ‘consent’ condition for processing is only required because of the email request, otherwise the data set would be anonymous and therefore not personal data.This will be on an ‘opt in, opt out basis’ with a clear statement that a contact email address is required if the responder wants to be included in the prize draw. |
| P1 – transparency – privacy noticesAt time data is obtained:* Identity and contact details
* Purpose of processing and lawful basis
* Any third party recipients
* Details of transfers to third countries
* Retention period
* Right to withdraw consent
* Existence of data subject rights
* Right to lodge a complaint to ICO
* Whether the provision of personal data form part of a statutory requirement and/or obligation and possible consequences of failing to provide the personal data
* Existence of automated decision making including profiling and information about how decisions are made, the significance and the consequences.
 |  A separate prize draw survey will be created to include a privacy notice:* Identity and contact details
* Purpose of processing and lawful basis: consent
* Any third party recipients; None
* Details of transfers to third countries: None, SurveyMonkey operates under a ‘PrivacyShield’ for EU based organisations.
* Retention period : Personal data records will be deleted once the draw is made and prize winner notified
* Right to withdraw consent: Yes, email ‘policy@carlisle.gov.uk’
* Existence of data subject rights: Link
* Right to lodge a complaint to ICO: Link
* Whether the provision of personal data form part of a statutory requirement and/or obligation and possible consequences of failing to provide the personal data : No
* Existence of automated decision making including profiling and information about how decisions are made, the significance and the consequences. : None
 |
| P1 – transparency | [ ] Provide information society services to children?None |
| P2 – collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes. | [ ]  Do we use the data for anything else?Only it’s purpose which is reporting on satisfaction and the public sector Equality Duty. The personal data identifier is a result of incentivising responses. |
| P3 – adequate, relevant and limited to what is necessary | [ ]  Adequate[ ]  Relevant [x]  Limited to what is necessary  |
| P4 – accurate and where necessary kept up to date | [x] Accurate[ ] Kept up to date |
| P5 – permits identification for no longer than necessaryTies in with retention schedules | [ ]  Retention schedules adopted[x]  Retention schedules maintained |
| P6 – appropriate security | [x]  Access restricted to electronic records: Login required to SurveyMonkey, this is restricted to named officers.[ ]  Access restricted to paper records [ ]  Paper records stored securely [ ]  Appropriate redaction for website[ ]  Do you know who to report breaches to? Yes |
| Information sharing | [ ]  Do we share information with third parties? No[ ]  Disclosure or sharing? No[ ]  Contract/agreement? No |
| Data processors | [ ]  Do we use third parties to process data? [x] External system providers: SurveyMonkey[ ]  Contract? |
| Data subject rightsRight of accessRight to rectificationRight to erasureRight to restriction of processingRight to data portabilityRight to object to processingRight to object to automated decision making | [ ]  Do systems allow easy retrieval of information to respond to SAR? Yes[ ]  Can you ensure rectification Yes[ ]  Can you ensure erasure Yes[ ]  Can you restrict processing Yes[ ]  Does data portability apply Yes[ ]  Does the right to object apply Yes[ ]  Do you use automated decision making? No |
| Data protection by design and by defaultPolicies and proceduresData protection impact assessment  | [ ]  DPIA required when making decisions that will affect privacy Yes[ ]  Do you have any specific team policies or procedures? Yes, approach to consultation[ ]  Do you need any specific team policies or procedures? No  |

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|  | **2. Information held – Personal Data included in Image Library records** |
| P1 – lawfulness - condition for processing | [x] 1 - Consent[ ]  2 - Necessary for performance of contract[ ]  3 – Compliance with legal obligation[ ]  4 – vital interests[ ]  5 – task carried out in public interest or exercise of official authority[ ]  6 – legitimate interests – N/A  |
| P1 - consent?Do we ask for consent? Right to withdrawDo we need it? Can we do it anyway?Opt in, not opt out |   |
| P1 – transparency – privacy noticesAt time data is obtained:* Identity and contact details
* Purpose of processing and lawful basis
* Any third party recipients
* Details of transfers to third countries
* Retention period
* Right to withdraw consent
* Existence of data subject rights
* Right to lodge a complaint to ICO
* Whether the provision of personal data form part of a statutory requirement and/or obligation and possible consequences of failing to provide the personal data
* Existence of automated decision making including profiling and information about how decisions are made, the significance and the consequences.
 |   |
| P1 – transparency | [ ] Provide information society services to children? No |
| P2 – collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes. | [ ]  Do we use the data for anything else? |
| P3 – adequate, relevant and limited to what is necessary | [ ]  Adequate[ ]  Relevant [x]  Limited to what is necessary  |
| P4 – accurate and where necessary kept up to date | [x] Accurate[ ] Kept up to date |
| P5 – permits identification for no longer than necessaryTies in with retention schedules | [x]  Retention schedules adopted : Retention schedule to be applied[ ]  Retention schedules maintained |
| P6 – appropriate security | [x]  Access restricted to electronic records : Login required[ ]  Access restricted to paper records : Kept in cabinet within secure office[ ]  Paper records stored securely : Kept in cabinet within secure office[ ]  Appropriate redaction for website : Not required[ ]  Do you know who to report breaches to?: Yes |
| Information sharing | [ ]  Do we share information with third parties? Yes, images shared with third parties if licence allows.[ ]  Disclosure or sharing? No[ ]  Contract/agreement? Contract/agreement in place with supplier who will know be viewed as the ‘Data Controller’ |
| Data processors | [x]  Do we use third parties to process data? Yes, suppliers must process the consent forms and provide evidence of consent.[x] External system providers: The Image Library is inhouse, data centre installation. The transfer of images is often through a file-sharing platform such as ‘Dropbox’.[x]  Contract? Yes, contract with supplier. |
| Data subject rightsRight of accessRight to rectificationRight to erasureRight to restriction of processingRight to data portabilityRight to object to processingRight to object to automated decision making | [x]  Do systems allow easy retrieval of information to respond to SAR? Yes, through forms and database IDs.[x]  Can you ensure rectification: Yes[x]  Can you ensure erasure: Yes[x]  Can you restrict processing: Yes, permission model on Image Library[x]  Does data portability apply: Yes, export function[x]  Does the right to object apply: Yes, managed through supplier[x]  Do you use automated decision making? No |
| Data protection by design and by defaultPolicies and proceduresData protection impact assessment  | [x]  DPIA required when making decisions that will affect privacy: Yes DPIA to be undertaken prior to commissioning any images.[x]  Do you have any specific team policies or procedures? No[x]  Do you need any specific team policies or procedures? No  |

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|  | **3. Information held – Personal Data included in application for Community Right to Bid** |
| P1 – lawfulness - condition for processing | [ ] 1 - Consent[ ]  2 - Necessary for performance of contract[x]  3 – Compliance with legal obligation[ ]  4 – vital interests[ ]  5 – task carried out in public interest or exercise of official authority[ ]  6 – legitimate interests – N/A |
| P1 - consent?Do we ask for consent? Right to withdrawDo we need it?  Can we do it anyway?Opt in, not opt out |  |
| P1 – transparency – privacy noticesAt time data is obtained:* Identity and contact details
* Purpose of processing and lawful basis
* Any third party recipients
* Details of transfers to third countries
* Retention period
* Right to withdraw consent
* Existence of data subject rights
* Right to lodge a complaint to ICO
* Whether the provision of personal data form part of a statutory requirement and/or obligation and possible consequences of failing to provide the personal data
* Existence of automated decision making including profiling and information about how decisions are made, the significance and the consequences.
 |   Privacy notice required for application form |
| P1 – transparency | [ ] Provide information society services to children? No |
| P2 – collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes. | [ ]  Do we use the data for anything else?No |
| P3 – adequate, relevant and limited to what is necessary | [ ]  Adequate[ ]  Relevant [x]  Limited to what is necessary  |
| P4 – accurate and where necessary kept up to date | [x] Accurate[ ] Kept up to date |
| P5 – permits identification for no longer than necessaryTies in with retention schedules | [x]  Retention schedules adopted : Retention schedule to be applied[ ]  Retention schedules maintained |
| P6 – appropriate security | [x]  Access restricted to electronic records : Login required[x]  Access restricted to paper records : Kept in cabinet within secure office?[x]  Paper records stored securely : Kept in cabinet within secure office?[ ]  Appropriate redaction for website : Yes[ ]  Do you know who to report breaches to?: Yes |
| Information sharing | [ ]  Do we share information with third parties? No[ ]  Disclosure or sharing? No[ ]  Contract/agreement? Contract/agreement in place with supplier who will know be viewed as the ‘Data Controller’ Carlisle City Council |
| Data processors | [x]  Do we use third parties to process data? No[ ] External system providers: No[ ]  Contract? No |
| Data subject rightsRight of accessRight to rectificationRight to erasureRight to restriction of processingRight to data portabilityRight to object to processingRight to object to automated decision making | [x]  Do systems allow easy retrieval of information to respond to SAR? No, can be searched if the through pdf form is OCR.[x]  Can you ensure rectification: Yes[x]  Can you ensure erasure: Yes[x]  Can you restrict processing: Yes[x]  Does data portability apply: Yes[x]  Does the right to object apply: Yes, but negates function[x]  Do you use automated decision making? No |
| Data protection by design and by defaultPolicies and proceduresData protection impact assessment    | [x]  DPIA required when making decisions that will affect privacy: Not required as the process is initiated by consenting adults.[x]  Do you have any specific team policies or procedures? Yes, CRtB procedure[x]  Do you need any specific team policies or procedures? No   |

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|  | **4.Information held – Personal Data included in Emergency Plans and Business Continuity Plans** |
| P1 – lawfulness - condition for processing | [x] 1 – Consent (Annual review of Emergency Plans and Business Continuity Plans)[x]  2 - Necessary for performance of contract (SLA Resilience Unit, Cumbria County Council)[x]  3 – Compliance with legal obligation (Civil Contingencies Act)[ ]  4 – vital interests[x]  5 – task carried out in public interest or exercise of official authority[ ]  6 – legitimate interests – N/A |
| P1 - consent?Do we ask for consent? Right to withdrawDo we need it? Can we do it anyway?Opt in, not opt out | The consent to hold personal data (Name, personal mobile number, personal email, home telephone) is included in the employee’s terms and conditions/contract and recorded in iTrent). A separate list for the purpose of out of hours or offsite contact is held for Emergency Planning and Business Continuity.The right to withdraw only exists if the participation in an Emergency Planning and Business Continuity is voluntary. In most cases this is a requirement in the job description of officers and managers.In the case of third parties and the voluntary sector, the participation in an Emergency Planning and Business Continuity is voluntary and the opt out is included in the annual review of plans. This is a business to business agreement that requires out of hours contact details to be shared. |
| P1 – transparency – privacy noticesAt time data is obtained:* Identity and contact details
* Purpose of processing and lawful basis
* Any third party recipients
* Details of transfers to third countries
* Retention period
* Right to withdraw consent
* Existence of data subject rights
* Right to lodge a complaint to ICO
* Whether the provision of personal data form part of a statutory requirement and/or obligation and possible consequences of failing to provide the personal data
* Existence of automated decision making including profiling and information about how decisions are made, the significance and the consequences.
 | * Identity and contact details
* Purpose of processing and lawful basis: Compliance/Legal agreement
* Any third party recipients; Cumbria County Council Resilience Unit
* Details of transfers to third countries: None
* Retention period : Personal data records will be deleted when participation in role is withdrawn
* Right to withdraw consent: Dependent on role
* Existence of data subject rights: Link
* Right to lodge a complaint to ICO: Link
* Whether the provision of personal data form part of a statutory requirement and/or obligation and possible consequences of failing to provide the personal data : Yes (Civic Contingencies Act)
* Existence of automated decision making including profiling and information about how decisions are made, the significance and the consequences. : None
 |
| P1 – transparency | [ ] Provide information society services to children?None |
| P2 – collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes. | [ ]  Do we use the data for anything else?No |
| P3 – adequate, relevant and limited to what is necessary | [ ]  Adequate[ ]  Relevant [x]  Limited to what is necessary  |
| P4 – accurate and where necessary kept up to date | [x] Accurate[ ] Kept up to date |
| P5 – permits identification for no longer than necessaryTies in with retention schedules | [ ]  Retention schedules adopted[x]  Retention schedules maintained |
| P6 – appropriate security | [x]  Access restricted to electronic records: Login and password[ ]  Access restricted to paper records [ ]  Paper records stored securely [ ]  Appropriate redaction for website[ ]  Do you know who to report breaches to? Yes |
| Information sharing | [ ]  Do we share information with third parties? No[ ]  Disclosure or sharing? No[ ]  Contract/agreement? No |
| Data processors | [ ]  Do we use third parties to process data? [x] External system providers: SurveyMonkey[ ]  Contract? |
| Data subject rightsRight of accessRight to rectificationRight to erasureRight to restriction of processingRight to data portabilityRight to object to processingRight to object to automated decision making | [ ]  Do systems allow easy retrieval of information to respond to SAR? Yes[ ]  Can you ensure rectification Yes[ ]  Can you ensure erasure Yes[ ]  Can you restrict processing Yes[ ]  Does data portability apply Yes[ ]  Does the right to object apply Yes[ ]  Do you use automated decision making? No |
| Data protection by design and by defaultPolicies and proceduresData protection impact assessment  | [ ]  DPIA required when making decisions that will affect privacy Yes[ ]  Do you have any specific team policies or procedures? Yes, Emergency Plan[ ]  Do you need any specific team policies or procedures? Yes, Emergency Planning Handbook  |

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|  | **5. Information held – Personal Data included in We Transfer** |
| P1 – lawfulness - condition for processing | [x] 1 - Consent[x]  2 - Necessary for performance of contract[ ]  3 – Compliance with legal obligation[ ]  4 – vital interests[ ]  5 – task carried out in public interest or exercise of official authority[ ]  6 – legitimate interests – N/A  |
| P1 - consent?Do we ask for consent? Right to withdrawDo we need it? Can we do it anyway?Opt in, not opt out |  We gain consent for the personal dataThe use of We Transfer is to complete a contract with a third party/partner. |
| P1 – transparency – privacy noticesAt time data is obtained:* Identity and contact details
* Purpose of processing and lawful basis
* Any third party recipients
* Details of transfers to third countries
* Retention period
* Right to withdraw consent
* Existence of data subject rights
* Right to lodge a complaint to ICO
* Whether the provision of personal data form part of a statutory requirement and/or obligation and possible consequences of failing to provide the personal data
* Existence of automated decision making including profiling and information about how decisions are made, the significance and the consequences.
 |  Covered in Image Library Privacy Impact Assessment |
| P1 – transparency | [ ] Provide information society services to children? No |
| P2 – collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes. | [ ]  Do we use the data for anything else? No |
| P3 – adequate, relevant and limited to what is necessary | [ ]  Adequate[ ]  Relevant [x]  Limited to what is necessary  |
| P4 – accurate and where necessary kept up to date | [x] Accurate[ ] Kept up to date |
| P5 – permits identification for no longer than necessaryTies in with retention schedules | [x]  Retention schedules adopted : Retention schedule to be applied, We Transfer is time limited transfer that meets the retention schedule.[ ]  Retention schedules maintained |
| P6 – appropriate security | [x]  Access restricted to electronic records : Restricted by an invitation only email.[ ]  Access restricted to paper records : None[ ]  Paper records stored securely : None[ ]  Appropriate redaction for website : Not required[ ]  Do you know who to report breaches to?: Yes |
| Information sharing | [ ]  Do we share information with third parties? Yes, We Transfer is a third party.[ ]  Disclosure or sharing? No[ ]  Contract/agreement? Yes, Data Processing Agreement in place. |
| Data processors | [x]  Do we use third parties to process data? The transfer of images is often through a file-sharing platform such as ‘We Transfer’.[x] External system providers: The transfer of images is often through a file-sharing platform such as ‘We Transfer’.[x]  Contract? Yes, agreement in place. |
| Data subject rightsRight of accessRight to rectificationRight to erasureRight to restriction of processingRight to data portabilityRight to object to processingRight to object to automated decision making | [x]  Do systems allow easy retrieval of information to respond to SAR? Yes, through forms and database IDs.[x]  Can you ensure rectification: Yes[x]  Can you ensure erasure: Yes[x]  Can you restrict processing: Yes, restrict email link[x]  Does data portability apply: Yes[x]  Does the right to object apply: Yes, managed through consent form[x]  Do you use automated decision making? No |
| Data protection by design and by defaultPolicies and proceduresData protection impact assessment  | [x]  DPIA required when making decisions that will affect privacy: Yes DPIA to be considered prior to commissioning any images.[x]  Do you have any specific team policies or procedures? No[x]  Do you need any specific team policies or procedures? No  |

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|  | 1. **Information held – Personal Data included in application for Community Asset Transfer**
 |
| P1 – lawfulness - condition for processing | [x] 1 – Consent[ ]  2 - Necessary for performance of contract[ ]  3 – Compliance with legal obligation[ ]  4 – vital interests[ ]  5 – task carried out in public interest or exercise of official authority[ ]  6 – legitimate interests – N/A |
| P1 - consent?Do we ask for consent? Right to withdrawDo we need it?  Can we do it anyway?Opt in, not opt out | Need details to contact applicant about the asset transfer application, without these we would be unable to respond to the application. |
| P1 – transparency – privacy noticesAt time data is obtained:* Identity and contact details
* Purpose of processing and lawful basis
* Any third party recipients
* Details of transfers to third countries
* Retention period
* Right to withdraw consent
* Existence of data subject rights
* Right to lodge a complaint to ICO
* Whether the provision of personal data form part of a statutory requirement and/or obligation and possible consequences of failing to provide the personal data
* Existence of automated decision making including profiling and information about how decisions are made, the significance and the consequences.
 |   Privacy notice required for application form |
| P1 – transparency | [ ] Provide information society services to children? No |
| P2 – collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes. | [ ]  Do we use the data for anything else?No |
| P3 – adequate, relevant and limited to what is necessary | [ ]  Adequate[ ]  Relevant [x]  Limited to what is necessary  |
| P4 – accurate and where necessary kept up to date | [x] Accurate[ ] Kept up to date |
| P5 – permits identification for no longer than necessaryTies in with retention schedules | [x]  Retention schedules adopted : Retention schedule to be applied[ ]  Retention schedules maintained |
| P6 – appropriate security | [x]  Access restricted to electronic records : Login required[ ]  Access restricted to paper records : Kept in cabinet within secure office?[ ]  Paper records stored securely : Kept in cabinet within secure office?[ ]  Appropriate redaction for website : Yes[ ]  Do you know who to report breaches to?: Yes |
| Information sharing | [x]  Do we share information with third parties? Council departments to consider application for asset transfer and potential legal agreement– Legal, Property, Finance[ ]  Disclosure or sharing?[x]  Contract/agreement? Contract/agreement in place with supplier who will be viewed as the ‘Data Controller’ Carlisle City Council |
| Data processors | [ ]  Do we use third parties to process data? No[ ] External system providers: No[ ]  Contract? No |
| Data subject rightsRight of accessRight to rectificationRight to erasureRight to restriction of processingRight to data portabilityRight to object to processingRight to object to automated decision making | [x]  Do systems allow easy retrieval of information to respond to SAR? No, can be searched if the through pdf form is OCR.[x]  Can you ensure rectification: Yes[x]  Can you ensure erasure: Yes[x]  Can you restrict processing: Yes[x]  Does data portability apply: Yes[x]  Does the right to object apply: Yes[x]  Do you use automated decision making? No |
| Data protection by design and by defaultPolicies and proceduresData protection impact assessment    | [x]  DPIA required when making decisions that will affect privacy: Not required as the process is initiated by consenting adults.[x]  Do you have any specific team policies or procedures? Yes, CAT policy and procedures[ ]  Do you need any specific team policies or procedures? No   |

# Data Protection Impact Assessments

The Council has decided to adopt the [ICO’s DPIA Template](https://ico.org.uk/media/for-organisations/documents/2258857/dpia-template-v1.docx).

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| **Step 1: Identify the need for a DPIA** |
| Explain broadly what project aims to achieve and what type of processing it involves. You may find it helpful to refer or link to other documents, such as a project proposal. Summarise why you identified the need for a DPIA – refer to screening checklist. |
| We need an online tool to schedule messages in Twitter. Hootsuite has been identified as a tool for this:<https://hootsuite.com/en-gb/plans/free> This is a new technology that may or may not process personal data in a way which involves tracking individuals’ online or offline location or behaviour. |

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| **Step 2: Describe the processing** |
| **Describe the nature of the processing:** How will you collect, use, store and delete data? What is the source of the data? Will you be sharing data with anyone? You might find it useful to refer to a flow diagram or other way of describing data flows. What types of processing identified as likely high risk are involved?Content will be placed in Hootsuite and then Hootsuite will access Tweeter to publish the message. This is a low risk activity. |
| **Describe the scope of the processing:** What is the nature of the data, and does it include special category or criminal offence data? How much data will you be collecting and using? How often? How long will you keep it? How many individuals are affected? What geographical area does it cover? |
|  |
| **Describe the context of the processing:** What is the nature of your relationship with the individuals? How much control will they have? Would they expect you to use their data in this way? Do they include children or other vulnerable groups? Are there prior concerns over this type of processing or security flaws? Is it novel in any way? What is the current state of technology in this area? Are there any current issues of public concern that you should factor in? Are you signed up to any approved code of conduct or certification scheme (once any have been approved)? |
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| **Describe the purposes of the processing:** What do you want to achieve? What is the intended effect on individuals? What are the benefits of the processing – for you, and more broadly?  |
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| **Step 3: Consultation process** |
| **Consider how to consult with relevant stakeholders:** Describe when and how you will seek individuals’ views – or justify why it’s not appropriate to do so. Who else do you need to involve within your organisation? Do you need to ask your processors to assist? Do you plan to consult information security experts, or any other experts? |
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| **Step 5: Identify and assess risks**  |
| **Describe source of risk and nature of potential impact on individuals.** Include associated compliance and corporate risksas necessary.  | **Likelihood of harm** | **Severity of harm** | **Overall risk**  |
|  | Remote, possible or probable | Minimal, significant or severe | Low, medium or high |

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| **Step 4: Assess necessity and proportionality** |
| **Describe compliance and proportionality measures, in particular:** What is your lawful basis for processing? Does the processing actually achieve your purpose? Is there another way to achieve the same outcome? How will you prevent function creep? How will you ensure data quality and data minimisation? What information will you give individuals? How will you help to support their rights? What measures do you take to ensure processors comply? How do you safeguard any international transfers? |
| [https://hootsuite.com/legal/privacy#](https://hootsuite.com/legal/privacy) |

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| **Step 6: Identify measures to reduce risk** |
| **Identify additional measures you could take to reduce or eliminate risks identified as medium or high risk in step 5** |
| **Risk**  | **Options to reduce or eliminate risk** | **Effect on risk** | **Residual risk** | **Measure approved** |
|  |  | Eliminated Reduced Accepted | Low Medium High | Yes/no |
| **Step 7: Sign off and record outcomes** |
| **Item**  | **Name/date** | **Notes** |
| Measures approved by: |  | Integrate actions back into project plan, with date and responsibility for completion |
| Residual risks approved by: |  | If accepting any residual high risk, consult the ICO before going ahead |
| DPO advice provided: |  | DPO should advise on compliance, step 6 measures and whether processing can proceed |
| **Summary of DPO advice:** |
| DPO advice accepted or overruled by: |  | If overruled, you must explain your reasons |
| **Comments:** |
| Consultation responses reviewed by: |  | If your decision departs from individuals’ views, you must explain your reasons |
| **Comments:** |
| This DPIA will kept under review by: |  | The DPO should also review ongoing compliance with DPIA |

# Fair Processing Notices/Privacy Notices

**Fair Processing Notice: Personal Data included in surveys, using Survey Monkey**

Carlisle City Council is committed to protecting and respecting your privacy in terms of how we collect, use, store and destroy your personal information.

We are the data controller of the personal information we will collect from you and under the General Data Protection Regulation, this fair processing notice is designed to provide you with all the information you have a right to be provided with.

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| Why are we collecting your personal information? |
| We are collecting your personal information for the prize draw. |
| What allows us to collect your personal information? |
| Your consent, which you can withdraw at any time |
| What personal information will we collect? |
| The personal information we want to gather from you is a contact name, email address, or telephone number for the prize draw only. |
| What will we do with your personal information? |
| Your personal information will be processed internally by Council staff in accordance with the Council’s Data Protection and Confidentiality Statement and will not be shared out with the Authority.  |
| How long will we keep your personal information? |
| Your personal information and the information held in relation to the prize draw will be kept until the draw is made and winner notified at which point it will be securely destroyed.  |
| Your rights are: |
| * To be informed
* To access your personal information
* To have inaccurate personal information rectified
* To have personal information erased
* To restrict processing of your personal information
* To obtain and reuse your personal information for your own purpose
* To object to the processing of your personal information
* To not be subject to decisions based solely on automated means, including profiling
 |
| Right to lodge a complaint with the UK Information Commissioner’s Office (ICO) |
| Should you be unhappy with the way Carlisle City Council has handled your personal information, we encourage you to let us know so that we can look into this for you and provide a response.Should you then wish to lodge a complaint with ICO you can contact them at:Website: <https://ico.org.uk/>Address: Information Commissioner’s Officer, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AFEmail: Casework@ico.org.uk |
| **Carlisle City Council can be contacted at:** | **Carlisle City Council’s Data Protection Officer can be contacted at:** |
| Address: Civic Centre, Carlisle, Cumbria, CA3 8QGEmail: customerservices@carlisle.gov.ukTelephone: 01228 817200 | Address: Civic Centre, Carlisle, Cumbria, CA3 8QGEmail: dataprotection@carlisle.gov.ukTelephone: 01228 817200 |

**Fair Processing Notice: Personal Data included in surveys, using Survey Monkey (emails to be shared with partners)**

Carlisle City Council is committed to protecting and respecting your privacy in terms of how we collect, use, store and destroy your personal information.

We are the data controller of the personal information we will collect from you and under the General Data Protection Regulation, this fair processing notice is designed to provide you with all the information you have a right to be provided with.

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| Why are we collecting your personal information? |
| We are collecting your personal information for the purposes of recording ‘break-out session’ choices and dietary requirements for lunch. |
| What allows us to collect your personal information? |
| Your consent, which you can withdraw at any time |
| What personal information will we collect? |
| The personal information we want to gather from you is a contact name and email address for the purpose as described in the above section “Why are we collecting your personal information?” only. |
| What will we do with your personal information? |
| Your personal information will be processed internally by Council staff in accordance with the Council’s Data Protection and Confidentiality Statement. It may also be shared with Council staff at Cumbria County Council, Dumfries & Galloway Council, Northumberland County Council and Scottish Borders Council (the Borderlands Partners) for the purposes of the event. |
| How long will we keep your personal information? |
| Your personal information and the information held in relation to the event will be kept until the day of the event and it will be securely destroyed within one calendar month of the event. |
| Your rights are: |
| * To be informed
* To access your personal information
* To have inaccurate personal information rectified
* To have personal information erased
* To restrict processing of your personal information
* To obtain and reuse your personal information for your own purpose
* To object to the processing of your personal information
* To not be subject to decisions based solely on automated means, including profiling
 |
| Right to lodge a complaint with the UK Information Commissioner’s Office (ICO) |
| Should you be unhappy with the way Carlisle City Council has handled your personal information, we encourage you to let us know so that we can look into this for you and provide a response.Should you then wish to lodge a complaint with ICO you can contact them at:Website: <https://ico.org.uk/>Address: Information Commissioner’s Officer, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AFEmail: Casework@ico.org.uk |
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**Fair Processing Notice: Personal Data included in Image Library records**

Carlisle City Council is committed to protecting and respecting your privacy in terms of how we collect, use, store and destroy your personal information.

We are the data controller of the personal information we will collect from you and under the General Data Protection Regulation, this fair processing notice is designed to provide you with all the information you have a right to be provided with.

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| Why are we collecting your personal information? |
| We are collecting your personal information for the purpose of communicating and marketing our services and projects. |
| What allows us to collect your personal information? |
| *Must include the appropriate lawful basis for processing:** *Consent (must advise that consent can be withdrawn at any time)*
* *Legitimate Interests?*

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| What personal information will we collect? |
| The Personal information we are required to gather from is your name and a contact telephone number or email.  |
| What will we do with your personal information? |
| *Include any of the following which apply:** *Shared with partners and media for the purpose(s) stated in the consent form*

Your personal information will be processed internally by Council staff in accordance with the Council’s Data Protection and Confidentiality Statement. Your personal information will be processed externally by third parties to complete contracts. A Data Processing Agreement is in place to protect your data.  |
| How long will we keep your personal information? |
| Your personal information and the information held in relation to your request will be kept for X years in accordance with the Council’s Retention Schedule, at which point it will be securely destroyed.  |
| Your rights are: |
| * To be informed
* To access your personal information
* To have inaccurate personal information rectified
* To have personal information erased
* To restrict processing of your personal information
* To obtain and reuse your personal information for your own purpose
* To object to the processing of your personal information
* To not be subject to decisions based solely on automated means, including profiling
 |
| Right to lodge a complaint with the UK Information Commissioner’s Office (ICO) |
| Should you be unhappy with the way Carlisle City Council has handled your personal information, we encourage you to let us know so that we can look into this for you and provide a response.Should you then wish to lodge a complaint with ICO you can contact them at:Website: <https://ico.org.uk/>Address: Information Commissioner’s Officer, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AFEmail: Casework@ico.org.uk |
| **Carlisle City Council can be contacted at:** | **Carlisle City Council’s Data Protection Officer can be contacted at:** |
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**Fair Processing Notice: Personal Data included in application for Community Right to Bid**

Carlisle City Council is committed to protecting and respecting your privacy in terms of how we collect, use, store and destroy your personal information.

We are the data controller of the personal information we will collect from you and under the General Data Protection Regulation, this fair processing notice is designed to provide you with all the information you have a right to be provided with.

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| Why are we collecting your personal information? |
| We are collecting your personal information for the purpose of dealing with your application which we are legally obliged to process in accordance with the Localism Act. |
| What allows us to collect your personal information? |
| *Must include the appropriate lawful basis for processing:** ***Legal Obligation (Localism Act)***
 |
| What personal information will we collect? |
| The Personal information we are required to gather from you as per the Act is your true applicant name and a contact address for correspondence. Failure to provide this information will result in your request being considered invalid meaning the Council will be unable to provide a response.  |
| What will we do with your personal information? |
| *Include any of the following which apply:** *Shared with internal services for the purpose(s) of validation and compliance with policy*
* *Required under a statutory/ contractual obligation and refusal to provide your information will result in the application being nullified.*

Your personal information will be processed internally by Council staff in accordance with the Council’s Data Protection and Confidentiality Statement and will not be shared out with the Authority.  |
| How long will we keep your personal information? |
| Your personal information and the information held in relation to your request will be kept for 3 years if the asset is not listed or 7 years if it is listed, in accordance with the Council’s Retention Schedule, at which point it will be securely destroyed.  |
| Your rights are: |
| * To be informed
* To access your personal information
* To have inaccurate personal information rectified
* To have personal information erased
* To restrict processing of your personal information
* To obtain and reuse your personal information for your own purpose
* To object to the processing of your personal information
* To not be subject to decisions based solely on automated means, including profiling
 |
| Right to lodge a complaint with the UK Information Commissioner’s Office (ICO) |
| Should you be unhappy with the way Carlisle City Council has handled your personal information, we encourage you to let us know so that we can look into this for you and provide a response.Should you then wish to lodge a complaint with ICO you can contact them at:Website: <https://ico.org.uk/>Address: Information Commissioner’s Officer, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AFEmail: Casework@ico.org.uk |
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**Fair Processing Notice: Personal Data included in Emergency Plans and Business Continuity Plans**

Carlisle City Council is committed to protecting and respecting your privacy in terms of how we collect, use, store and destroy your personal information.

We are the data controller of the personal information we will collect from you and under the General Data Protection Regulation, this fair processing notice is designed to provide you with all the information you have a right to be provided with.

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| Why are we collecting your personal information? |
| We are collecting your personal information for the purpose of emergency planning as set out in the Civic Contingences Act. |
| What allows us to collect your personal information? |
| *Must include the appropriate lawful basis for processing:** *Consent (must advise that consent can be withdrawn at any time)*
* *Performance of a contract*
* ***Legal Obligation (Civil Contingences Act)***
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| What personal information will we collect? |
| The Personal information we are required to gather from you is name and out of hours contact telephone number(s). Failure to provide this information will result in a failure to meet our duties as a category 1 responder. |
| What will we do with your personal information? |
| *Include any of the following which apply:** *Shared with Cumbria County Council Resilience Unit for the purpose(s) of responding to a major incident*
* *Required under a statutory/ contractual obligation and refusal to provide your information will/ may result in a failure to meet our category 1 duties in the Civil Contingency Act. It may also be a breach of your terms and conditions in the contract of employment and a stipulation in your job description.*

Your personal information will be processed internally by Council staff in accordance with the Council’s Data Protection and Confidentiality Statement.  |
| How long will we keep your personal information? |
| Your personal information and the information held in relation to your request will be kept for X years in accordance with the Council’s Retention Schedule, at which point it will be securely destroyed.  |
| Your rights are: |
| * To be informed
* To access your personal information
* To have inaccurate personal information rectified
* To have personal information erased
* To restrict processing of your personal information
* To obtain and reuse your personal information for your own purpose
* To object to the processing of your personal information
* To not be subject to decisions based solely on automated means, including profiling
 |
| Right to lodge a complaint with the UK Information Commissioner’s Office (ICO) |
| Should you be unhappy with the way Carlisle City Council has handled your personal information, we encourage you to let us know so that we can look into this for you and provide a response.Should you then wish to lodge a complaint with ICO you can contact them at:Website: <https://ico.org.uk/>Address: Information Commissioner’s Officer, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AFEmail: Casework@ico.org.uk |
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**Fair Processing Notice: Personal Data included in application for Community Asset Transfer**

Carlisle City Council is committed to protecting and respecting your privacy in terms of how we collect, use, store and destroy your personal information.

We are the data controller of the personal information we will collect from you and under the General Data Protection Regulation, this fair processing notice is designed to provide you with all the information you have a right to be provided with.

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| Why are we collecting your personal information? |
| We are collecting your personal information to deal with your expression of interest/application for a Community Asset Transfer. |
| What allows us to collect your personal information? |
| Your consent, which you can withdraw at any time. |
| What personal information will we collect? |
| The personal information we want to gather from you is a contact name, postal address, email address and telephone number. |
| What will we do with your personal information? |
| It will be shared with internal services for consideration of the application and enable the Council to respond to you.Your personal information will be processed internally by Council staff in accordance with the Council’s Data Protection and Confidentiality Statement and will not be shared out with the Authority.  |
| How long will we keep your personal information? |
| Your personal information and the information held in relation to your request will be kept in accordance with the Council’s Retention Schedule:* 3 years if the asset transfer application is unsuccessful, at which point it will be securely destroyed.
* the duration of any lease agreement if the asset transfer application is successful. Once the lease agreement is terminated, the information will be kept for 3 years, at which point it will be securely destroyed.
 |
| Your rights are: |
| * To be informed
* To access your personal information
* To have inaccurate personal information rectified
* To have personal information erased
* To restrict processing of your personal information
* To obtain and reuse your personal information for your own purpose
* To object to the processing of your personal information
* To not be subject to decisions based solely on automated means, including profiling
 |
| Right to lodge a complaint with the UK Information Commissioner’s Office (ICO) |
| Should you be unhappy with the way Carlisle City Council has handled your personal information, we encourage you to let us know so that we can look into this for you and provide a response.Should you then wish to lodge a complaint with ICO you can contact them at:Website: <https://ico.org.uk/>Address: Information Commissioner’s Officer, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AFEmail: Casework@ico.org.uk |
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