

# Privacy Notice for Bereavement Services

We provide a [supportive and sensitive bereavement service](#) to those who are experiencing the loss of a loved one. In order to provide a bereavement service to you, it is necessary for us to collect and hold personal information.

Most of the personal information we hold about you is provided by you in your application(s) and supporting document(s).

**Processing activity** - we will process personal information relating to:

- burial applications
- memorial applications
- notification of death
- exhumation records
- purchase of grave
- transfer of exclusive rights of burial
- record of payment of fees (excluding bank/credit card details)
- general correspondence between you and us on matters related to the bereavement service

**Information requirements** - our processing activities may include:

- your address, telephone number, email address

**Lawful bases** - our lawful bases for processing your personal information are:

- our legal obligation(s) under the Burial Act 1857
- our legal obligation(s) under the Local Authorities Cemeteries Order 1977
- necessary for the performance of a task in the public interest or in the exercise of official authority vested in us under the above legislation

**Data sharing** – your information may be shared with the relevant service department. We may also share your information with a number of other organisations for example with stone masons, undertakers, courts and the Ombudsman (where you have complained to the Ombudsman and we are asked to investigate your complaint). We may share your information with elected Councillors and/or Member of Parliament where you have asked them to represent you.

We may rely on a number of **exemptions**, which allow us to share information without needing to identify a lawful basis for the sharing and without needing to provide you with information about the sharing. Please refer to the Kent & Medway Information Agreement for further details on our sharing arrangements.

**Retention period** – we keep your personal information for the minimum period necessary. The information outlined in this Privacy Notice will be kept in accordance with the retention periods referred to in the Bereavement Services Information Asset Register. All information will be held securely and disposed of confidentially.

**Right to object** – where processing your personal information is required for the performance of a public interest task (see our lawful bases above), you have the right to object on ‘grounds relating to your particular situation’. We will have to demonstrate why it is appropriate for us to continue to

use your personal data.

**Changes to this Privacy Notice** – we review this Privacy Notice regularly and will place updates on our website.

Please refer to our Corporate Privacy Notice at [www.dartford.gov.uk](http://www.dartford.gov.uk) for further details of how we process your personal information and for details on your additional rights.

# BEREAVEMENT SERVICES - INFORMATION ASSET REGISTER 2018

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIA <sup>1</sup>	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	Waste & Recycling Manager	<b>Procedure/guidance</b> on a range of matters	N/A	Supersedes previous version	Common Practice	Superseded	No	N/A	No	N/A	Electronic	N/A
Internal Services	Waste & Recycling Manager	<b>Cemeteries Rules &amp; Regulations</b>	N/A	Permanent	Common Practice	Archive	No	N/A	No	N/A	Electronic	N/A
Internal Services	Waste & Recycling Manager	<b>Burial Registration</b> – 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
Internal Services	Waste & Recycling Manager	<b>Grave Register</b> – 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
Internal Services	Waste & Recycling Manager	<b>Burial Register</b> - 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

<sup>1</sup> 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

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Internal 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
Internal 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
Internal Services	Waste & Recycling Manager	Cemetery Plans	N/A	Permanent	Common Practice	Archive	No	N/A	No	N/A	Paper copy	N/A
Internal 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
Internal 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

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Internal 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
Internal 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
Internal 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 2018

## TECHNICAL & ORGANISATIONAL SECURITY MEASURES

Strategic Directorate	Information Asset Owner	IT Systems	Security Measures
Internal Services	I.C.T. Manager	<b>Idocs/UNIFORM/ Academy and department computers and laptops/Internet/ Intranet</b> – 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	<b>Pentana</b> – maintenance & administration	BS ISO/IEC 27001:2013 compliant
Internal Services	Waste & Recycling Manager	<b>BACAS/Idocs/ UNIFORM Academy/Pentana and computers and laptops/Internet/ Intranet</b> – input of data – the landlord & tenant function	Use of passwords
Internal Services	Customer Services Manager	<b>On-line payments (hosted by Capita)</b>	PCIDSS compliant
External Services	Waste and Parks Manager	<b>Disaster recovery</b>	See Business Continuity Plan
Internal Services	Waste & Recycling Manager	<b>CCTV</b>	A key part of the Council's security measures

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## 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