

# Privacy Notice for Internal Audit (a joint service with Sevenoaks District Council)

Our primary objective as an Internal Audit function is to provide independent assurance over the Council's systems of internal control, governance and risk management.

Internal Audit is a required service under Regulation 5 of the Accounts and Audit Regulations 2015. We are required to work in accordance with the Public Sector Internal Audit Standards.

**Processing activity** - In general terms, we process personal information relating to:

- referrals made under the Whistleblowing Policy
- the prevention, deterrence and detection of fraud committed against the Council
- the investigation of potential irregularities in the Council's systems and/or processes

**Information requirements** – In the course of providing the service, we collect such evidence necessary for us to form an opinion over the effectiveness of the systems, processes, policies, and procedures we are auditing. This will include any existing personal data held by the Council in carrying out its functions. This may include:

- full name, date of birth, address, email address, telephone number, sex and marital status
- employment information, for example national insurance number, details of employer, salary details, employment dates, next of kin, sickness records
- financial details, for example bank and/or building society account information including transactions & balances, mortgage accounts, insurance policies, pension information, credit history
- health information gathered to assess eligibility for benefits
- financial information regarding appraisal of financial standing of potential contractors
- written statements and recordings of interviews conducted
- other information gathered during the course of an investigation or proactive exercise

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

- our legal obligation(s) under section 151 of the Local Government Act 1972
- our legal obligation(s) under the Police and Criminal Evidence Act 1984
- our legal obligations(s) under the Local Government Finance Act 1992 (as amended)
- our legal obligation(s) under the Social Security Administration Act 1992
- our legal obligation(s) under the Criminal Procedure and Investigations Act 1996
- our legal obligation(s) under the Fraud Act 2006
- our legal obligation(s) under the Bribery Act 2010
- our legal obligation(s) for the administration of council tax under the Local Government Finance Act 2012
- our legal obligation(s) under Part 6 of the Local Audit and Accountability Act 2014
- our legal obligation(s) under the Accounts and Audit Regulations 2015
- where needed for the performance of a task carried out in the public interest (under the above legislation)
- the exercise of official authority vested in us under the Serious Crime Act 2007 (where needed to disclose information to prevent fraud)

**Reasons for processing** - some of the information that is collected and shared is classified as:

- special category personal data;
- criminal convictions and offences (including alleged offences).

This is processed for reasons of substantial public interest under the laws that apply to us where this helps to meet our broader social obligations such as where it is necessary for us to fulfil our legal obligations and regulatory requirements. We have a Data Protection Policy that sets out how this information will be handled.

**Joint Data Controller**- the administration of the internal audit function is undertaken by us jointly with Sevenoaks District Council under a collaborative partnership arrangement. We decide together all the purposes for using the personal information that we share and we decide together the broad ways in which that personal information will be used.

**Data sharing** - we may share and receive information from:

- our department(s) including Electoral Registration
- other local authorities
- government agencies
- courts/tribunals
- Land Registry
- HMRC
- Border Force
- Department for Work and Pensions
- employers
- Cabinet Office (as part of the [National Fraud Initiative](#))
- National Audit Office
- Police
- credit reference agencies
- health and social care organisations

We may also 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 our Asset Information Register. All information will be held securely and disposed of confidentially.

**Anonymisation**- your personal information may be converted ('anonymised') into statistical or aggregated data in such a way that ensures that you cannot be identified from it. Aggregated data cannot, by definition, be linked back to you as an individual and may be used to conduct research and analysis, including the preparation of statistics for use in our reports.

**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.

# INTERNAL AUDIT (SHARED SERVICE WITH SEVENOAKS DISTRICT COUNCIL) - INFORMATION ASSET REGISTER

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	Audit, Risk & Anti-Fraud Manager (Acting Audit Manager)	<a href="#">Audit Working Papers</a>	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)	<a href="#">Audit Reports, including Management Action Plan</a>	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)	<a href="#">Recommendation follow up</a>	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

<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

# INTERNAL AUDIT (SHARED SERVICE WITH SEVENOAKS DISTRICT COUNCIL) - INFORMATION ASSET REGISTER

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)	<b>Fraud and Irregularity working papers and reports</b>	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

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)	<b>Selective Invoice Checks</b>	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)	<b>Customer satisfaction questionnaires</b>	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)	<b>Whistleblowing</b>	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

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)	<b>Annual Planning Process</b>	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)	<b>Audit Board and Audit Committee Reports</b>	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)	<b>Minutes of Team Meetings</b>	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)	<b>Performance Indicators</b>	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)	<b>Operational Risk Registers</b>	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)	<b>Strategic Risk Register (for SDC only)</b>	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)	<b>General correspondence –</b> 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

## 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 - <b>GDPR compliant</b>
Internal Services	Audit, Risk & Anti-Fraud Manager (Acting Audit Manager)	Team Mate- Data input	Yes	Password administration
Internal Services	Policy & Corporate Support Manager	Pentana (previously Covalent) – 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)	Covalent 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

## 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  Covalent - Cloud based – retention only  Secure Waste Disposal - no processing –  Partnership Working Agreement between DBC and SDC <sup>2</sup>	Compliant  Covalent - BS ISO/IEC 27001:2013 compliant  Secure Waste Disposal – confidentiality clause in contract  <b>Partnership Agreement – to be reviewed by SDC</b>	N/A	YES – Medium - 4

<sup>2</sup> 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.