

# DARTFORD BOROUGH COUNCIL – DATA RETENTION & DISPOSAL POLICY & SCHEDULE

For the purposes of this Policy:

**‘Data Protection Legislation’** means the UK GDPR and any national implementing laws, regulations and secondary legislation, as amended or updated from time to time and any successor legislation to the UK 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

**‘UK GDPR’** derived from the General Data Protection Regulation (EU) 2016/679

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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personal data when we no longer need it will reduce the risk that it becomes irrelevant, excessive, inaccurate or out of date.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 (ROPA<sup>1</sup>)** (‘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.

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<sup>1</sup> Article 30 UK 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 data<sup>2</sup> and non-personal data<sup>3</sup>. 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.

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<sup>2</sup>Any 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

<sup>3</sup>Data 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

## 4. Guiding principles

**4.1** Through this Policy and our data retention practices referred to in our IARs/ROPAS, we aim to 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 Chief Officer and Director of Corporate Services 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);
- to advise the Leadership Team and the Audit Board on the information risk aspects of the Council's statement on internal controls/annual governance statement;
- to report to the Audit Board on the effectiveness of the Council's' cyber security management processes;
- to own 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 co-ordinated 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](mailto: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 (SDC) for the delivery of services relating to Business Rates (NNDR), Council Tax, Fraud Prevention & Detection and Internal Audit.

SDC does not publish its retention periods in a single place for Business Rates (NNDR), Council Tax and Fraud Prevention & Detection. See SDC's [Record retention guidelines](#) Requests for retention periods relating to Business Rates (NNDR), Council Tax, and Fraud Prevention & Detection are to be made to [data.protection@sevenoaks.gov.uk](mailto:data.protection@sevenoaks.gov.uk)

Retention periods relating to Internal Audit are published by us.

### **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 (IARs/ROPAs) (see the Annex to this Data Retention & Disposal Policy & Schedule)
- 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)

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
Housing & Public Protection	Waste & Recycling Manager	<a href="#">Procedure/guidance</a> on a range of matters	N/A	Supersedes previous version	Common Practice	Superseded	No	N/A	No	N/A	Electronic	N/A
Housing & Public Protection	Waste & Recycling Manager	<a href="#">Cemeteries Rules &amp; Regulations</a>	N/A	Permanent	Common Practice	Archive	No	N/A	No	N/A	Electronic	N/A
Housing & Public Protection	Waste & Recycling Manager	<a href="#">Burial Registration</a> – 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
Housing & Public Protection	Waste & Recycling Manager	<a href="#">Grave Register</a> – 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
Housing & Public Protection	Waste & Recycling Manager	<a href="#">Burial Register</a> - 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

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

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
Housing & Public Protection	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
Housing & Public Protection	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
Housing & Public Protection	Waste & Recycling Manager	Cemetery Plans	N/A	Permanent	Common Practice	Archive	No	N/A	No	N/A	Paper copy	N/A
Housing & Public Protection	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
Housing & Public Protection	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)

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
Housing & Public Protection	Waste & Recycling Manager	<b>Complaints</b> – 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
Housing & Public Protection	Waste & Recycling Manager	<b>Correspondence (general)</b> – 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
Housing & Public Protection	Waste & Recycling Manager	<b>Performance Indicators</b> - 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

Directorate	Information Asset Owner	IT Systems	Security Measures	
Corporate Services	Head of IT and Transformation	<a href="#">Idocs/UNIFORM/Academy and department computers and laptops/Internet/Intranet</a> – 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	
Growth & Community	Community Development Manager	<a href="#">Pentana</a> – maintenance & administration	BS ISO/IEC 27001:2013 compliant	
Housing & Public Protection	Waste & Recycling Manager	<a href="#">BACAS/Idocs/UNIFORM Academy/Pentana and computers and laptops/Internet/Intranet</a> - – input of data – the landlord & tenant function	Use of passwords	
Housing & Public Protection	Customer Services Manager	<a href="#">On-line payments (hosted by Capita)</a>	PCIDSS compliant	
Housing & Public Protection	Waste and Parks Manager with IT support	<a href="#">Disaster recovery</a>	See Business Continuity Plan	

# 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)

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
Growth & Community	Building Control Manager	<a href="#">Procedure/guidance</a> 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
Growth & Community	Building Control Manager	<a href="#">Competent Persons Register</a>	N/A	Permanent	Statutory	Archive	Yes - identifiable natural persons only) - name, address, contact details	Scheme approved by HCLG	No	N/A	Electronic – Idox	No
Growth & Community	Building Control Manager	<a href="#">Initial Notices Register</a>	N/A	Permanent	Statutory	Archive	Yes - identifiable natural persons only) - name, address, contact details	Scheme approved by HCLG	No	N/A	Electronic – Idox	No
Growth & Community	Building Control Manager	<a href="#">Building Control application process</a> – 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
Growth & Community	Building Control Manager	<a href="#">Building works' inspection</a> – 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

<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

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

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Growth & Community	Building Control Manager	<b>The process of building control enforcement</b> – 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 Electronic – Idox	No
Growth & Community	Building Control Manager	<b>Structural Engineers details &amp; calculations Architects drawings Specialist consultants (e.g. Mechanical engineering etc. Pre-existing underground services etc.</b>	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 – Idox	No
Growth & Community	Building Control Manager	<b>Performance Indicators</b> – 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 – Idox - Pentana	N/A
Growth & Community	Building Control Manager	<b>Fire Safety – 2005 Order consultation with Fire Brigade - case file material</b>	N/A	Permanent	Statutory	Archive	Yes - identifiable natural persons only) - name, address, contact details	Public interest task/legal obligation – Regulatory Reform (Fire Safety) Order 2005	NO	N/A	Electronic – Idox	N/A

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

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
Growth & Community	Building Control Manager	<b>General correspondence</b> – 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 – Idox	No
Growth & Community	Building Control Manager	<b>Dangerous Structures</b> – 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 – Idox	No
Growth & Community	Building Control Manager	<b>Demolitions – counter notices</b> - 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 – Idox	No
Growth & Community	Building Control Manager	<b>Microfiche case records</b> - 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
Growth & Community	Building Control Manager	<b>Means of escape from fire</b> – 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 – Idox	No



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

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) -
Growth & Community	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

Directorate	Information Asset Owner	IT Systems	Security Measures	
Growth & Community	Head of IT & Transformation	<a href="#">Computer systems/laptops/Internet/Intranet/UNIFORM/Idox</a> – 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	
Growth & Community	Customer Services Manager	<a href="#">On-line payments</a>	PCIDSS compliant	
Growth & Community	Community Development Manager	<a href="#">Pentana</a> – maintenance & administration	BS ISO/IEC 27001:2013 compliant	
Growth & Community	Building Control Manager	<a href="#">Pentana/UNIFORM/Idox/Internet/Intranet</a> – input of data – the building control function	Password administration	
Growth & Community	Building Control Manager	<a href="#">Disaster Recovery</a>	In accordance with the Business Continuity Plan	

# 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

# CLIMATE CHANGE - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

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
Housing & Public Protection	Head of Housing  Climate Change Manager	<b>Energy Efficiency</b> – 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
Housing & Public Protection	Climate Change Manager	<b>BEIS LADS 1 External Wall Insulation and Air Source Heat Pump</b>	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 and /or electronic  Alerts on DBC website	N/A
Housing & Public Protection	Climate Change Manager	<b>Collective Switching</b> – 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
Housing & Public Protection	Climate Change Manager	<b>LA Flexible Eligibility Programme</b> - 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
Housing & Public Protection	Climate Change Manager	<b>Winter Warmth</b>	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/A

# CLIMATE CHANGE - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

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
Housing & Public Protection	Climate Change Manager	<b>Interreg 2 Seas Mers Zeeen - Triple – A - adoption of low-carbon technologies by home-owners</b> 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
Housing & Public Protection	Climate Change Manager	<b>Home Energy Conservation Act biannual reports</b>	N/A	5 years	Common Practice	Disposal	No	N/A	No	N/A	Paper copy/electronic	N/A
Housing & Public Protection	Climate Change Manager	<b>Greenhouse Gas Emissions - reporting to Government</b>	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
Housing & Public Protection	Head of Housing	<b>Display Energy Certificates and Energy performance certificates</b>	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
Housing & Public Protection	Climate Change Manager	<b>Fuel Schemes - Poverty - alleviating fuel</b>	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

# CLIMATE CHANGE - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

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) -
Housing & Public Protection	Head of Housing	<b>Safeguarding Referrals&amp; adults at risk)</b>  <b>Childrens lead on referral is Jade Ransley</b>	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

# CLIMATE CHANGE - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

## TECHNICAL & ORGANISATIONAL SECURITY MEASURES

Directorate	Information Asset Owner	IT Systems	Security Measures	
Corporate Services	Head of IT & Transformation	<a href="#">Idox/UNIFORM and department computers and laptops, internet/intranet</a> – 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	
Housing & Public Protection	Head of Housing	<a href="#">Idox/UNIFORM and computers and laptops/Internet/ Intranet</a> - – input of data – PSH functions	Use of passwords	
Growth & Community	Customer Services Manager	<a href="#">On-line payments (hosted by Capita)</a>	PCIDSS compliant	
Growth & Community	Community Development Manager	Pentana – maintenance & administration	BS ISO/IEC 27001:2013 compliant	
Housing & Public Protection	Head of Housing	<a href="#">Disability Facilities Grant</a> – financial assessment using FERRET program	User password	
Corporate Services	Head of IT & Transformation	<a href="#">Stay Connected email alerts (DBC website)</a>	Subscriber own password – unsubscribe at any time	
Growth & Community	head of Housing with IT Support	<a href="#">Disaster recovery</a>	See Business Continuity Plan	
Housing & Public Protection	Climate Change Manager	<a href="#">Collective Switching</a>	Use of passwords	
Housing & Public Protection	Change Manager	<a href="#">Warm Homes</a>	Use of passwords	
Housing & Public Protection	Change Manager	<a href="#">LA Flex</a>	Use of passwords	

# CLIMATE CHANGE - 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.Town & Country 7.Kent & Medway Fire & Rescue Authority 8.KCC 9.NHS 10.Social Services 11.Mortgage providers 12.DFG agents 13.EE installers 14.Energy suppliers (fuel poverty schemes (Digital Economy Act 2017) 15.Darent Valley Hospital 16.IChoosr 17.BRE 18.BEIS 19. Cambridgeshire and Peterborough Combined Authority	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)  Town & Country (Handyperson Scheme)  iChoosr (collective switching scheme)  Kent & Medway Sustainable Energy Partnership – Kent Warm Homes Framework  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  Town & Country compliant  iChoosr – compliant  Kent Warm Homes Framework – compliant  SGN - compliant	N/A	N/A	YES –HIGH – risk score 9



## COMMUNITY DEVELOPMENT- INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

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
Growth & Community	Community Development Manager	<b>Peter Blake Gallery</b> - 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
Growth & Community	Community Development Manager	<b>Corporate Plan</b> – 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
Growth & Community	Community Development Manager	<b>Equality &amp; Diversity Document Framework</b> – 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
Growth & Community	Community Development Manager	<b>Customer Access Reviews</b> – 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
Growth & Community	Community Development Manager	<b>Consultation &amp; Engagement Strategy and Toolkit</b> -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
Growth & Community	Community Development Manager	<b>Consultations &amp; Surveys</b> – 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

## COMMUNITY DEVELOPMENT- INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

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
Growth & Community	Community Development Manager	<b>Performance Indicator - Data Quality Policy</b> – 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
Housing & Public Protection	Director of Housing & Public Protection	<b>Safeguarding Policy</b> – 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
Housing & Public Protection	Director of Housing & Public Protection	<b>Modern Anti-Slavery &amp; Human Trafficking Statement</b> – 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
Growth & Community	Community Development Manager	<b>Social Media Policy</b> – 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
Growth & Community	Community Development Manager	<b>Performance indicators</b> – 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

## COMMUNITY DEVELOPMENT- INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

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
Growth & Community	Community Development Manager	<b>Safeguarding Training Records</b> – 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
Growth & Community	Community Development Manager	<b>Dartford Youth Council</b> - 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
Growth & Community	Community Development Manager	<b>Elders Forum</b> - 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
Growth & Community	Community Development Manager	<b>Events</b> - 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

## COMMUNITY DEVELOPMENT- INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

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
Growth & Community	Community Development Manager	<b>Safeguarding Referrals (children &amp; adults at risk)</b> - emails & schedule of referrals – central log (anonymised)	N/A	Central Log - 2 years from date of entry  Other data destroyed in accordance with the <a href="#">Safeguarding Privacy Notice</a>	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	Electronic	Yes
Growth & Community	Communities & Business Team (SDC)	<b>Family Weight Management Programme</b> - referrals & anonymised statistics and <b>Community Services Data Set</b> Collection & Analysis (CSDS)	N/A	2 years from date registration	Common Practice	Secure disposal	Yes - contact details such as name, title, addresses, telephone numbers & personal email addresses	Pubic interest- Local Government Miscellaneous Provisions Act) 1976 Legal obligation - 251B Health and Social Care Act 2012 (as amended) for CSDS	Yes – medical/ health data	Substantial Public interest (Articles 6(1)(d) and 9(2)(c) GDPR)	Paper copies/ Data entered onto an excel spreadsheet that is password protected	Yes
Growth & Community	Communities & Business Team (SDC)	<b>Health Walks</b> - referrals & anonymised statistics	N/A	2 years from registration	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
Growth & Community	Communities & Business Team (SDC)	<b>Postural Stability Classes</b> - Evaluation forms and anonymised statistics	N/A	2 years from registration	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
Growth & Community	Communities & Business Team (SDC)	<b>Exercise Classes</b> - Evaluation forms and anonymised statistics	N/A	2 years from registration	Common Practice	Secure disposal	Yes - contact details such as name, title, addresses, telephone numbers & personal email addresses	Local Government Miscellaneous Provisions Act) 1976	Yes – medical/ health data	Ditto above	Manual-paper copies Data entered onto an excel spreadsheet that is password protected	No

## COMMUNITY DEVELOPMENT- INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

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
Growth & Community	Museum Curator	<b>Accession records for Museum objects</b> – 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
Growth & Community	Museum Curator	<b>School Loan Service forms (Museum)</b> - 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
Growth & Community	Museum Curator	<b>Object Entry Forms for incoming loans or items left for identification (Museum)</b>	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
Growth & Community	Community Development Manager	<b>Dartford Town Centre Heritage Initiative Grant Scheme</b> – 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

## COMMUNITY DEVELOPMENT- INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

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
Growth & Community	Community Development Manager	<b>Dartford Festival (annual)</b> - 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
Growth & Community	Community Development Manager	<b>Dartford Festival (annual)</b> - 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
Growth & Community	Community Development Manager	<b>Grants</b> – applications and decisions  Community grants  Homes for Ukraine Scheme – Support for Dartford residents bringing their friends and family fleeing the conflict in Ukraine to the UK and to support the new Ukrainian community  Working Household Fund	Yes	2 years from date of grant  2 years from date of Scheme closure  6 months from 31 March 2023	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
Growth & Community	Community Development Manager	<b>Projects, events &amp; heritage</b> – 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

## COMMUNITY DEVELOPMENT- INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

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
Growth & Community	Community Development Manager	<b>Capital Works</b> – 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
Growth & Community	Town Centre & Business Support Manager	<b>Town Centre Liaison</b> - 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
Growth & Community	Town Centre & Business Support Manager	<b>Market Stalls &amp; Street Trading Licensing</b> – 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
Growth & Community	Community Development Manager	<b>Assets of Community Value</b> – 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
Growth & Community	Community Development Manager	<b>Public events – lost children and vulnerable adults</b> - 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

## COMMUNITY DEVELOPMENT- INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

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
Growth & Community	Community Development Manager	<b>Public events</b> – 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
Growth & Community	Community Development Manager	<b>Awards Nominations</b> - 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
Growth & Community	Community Development Manager	<b>Photographs &amp; digital images – photos, digital images</b> , 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



## COMMUNITY DEVELOPMENT- INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

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
Growth & Community	Community Development Manager	<a href="#">Refernet - referrals</a>	Yes	6 months from date of referral	Common Practice	Secure Disposal	Yes - personal contact details such as name, title, addresses, telephone numbers & personal email addresses and reasons for referral	Legal obligation – section 179 Housing Act 1996 (as amended) and section 131 Welfare Reform Act 2012 (as amended), with ancillary powers confirmed by Local Government Act 1972 section 111 and Localism Act 2011 section 1  Public task - in service to the above legislation	Yes- health and ethnic data	Substantial public interest- section 179 Housing Act 1996 (as amended) and section 131 Welfare Reform Act 2012 (as amended), with ancillary powers confirmed by Local Government Act 1972 section 111 and Localism Act 2011	Electronic	N/A
Growth & Community	Community Development Manager	<a href="#">Emergency Planning</a> 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 & electronic	N/A
Growth & Community	Community Development Manager	<a href="#">Emergency Planning Response</a> –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	Electronic	N/A

# COMMUNITY 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	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. KCC Public Health 7.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  ReferKent- Refernet – data sharing agreement	YES – Town Centre Liaison marketing initiative       DSA compliant	N/A	YES – High –Score 9

## COMMUNITY DEVELOPMENT- INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

### TECHNICAL & ORGANISATIONAL SECURITY MEASURES

Directorate	Information Asset Owner	IT Systems	Security Measures
Corporate Services	Head of IT & Transformation	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
Corporate Services	Head of IT & Transformation	On-line payments – maintenance & administration	PCIDSS compliant
Corporate Services	Head of IT & Transformation	Stay Connected (DBC website) – maintenance & administration	Customer password input and unsubscribe
Growth & Community	Community Development Manager	Pentana/Intranet/Internet/ computer systems – input of data related to policy & corporate support	Password administration
Growth & Community	Community Development Manager	Pentana – maintenance & administration	BS ISO/IEC 27001:2013 compliant
Growth & Community	Community Development Manager with IT Services support	Disaster recovery	See Business Continuity Plan

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

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
Growth & Community	Property Services Manager	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
Growth & Community	Property Services Manager	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	
Growth & Community	Property Services Manager	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
Growth & Community	Property Services Manager	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
Growth & Community	Property Services Manager	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
Growth & Community	Property Services Manager	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

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

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
Growth & Community	Property Services Manager	<a href="#">Leased renewals</a>	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
Growth & Community	Property Services Manager	<a href="#">Premises files</a> - 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
Growth & Community	Property Services Manager	<a href="#">Correspondence (general)</a> – 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
Growth & Community	Property Services Manager	<a href="#">Valuations</a> - 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

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

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
Growth & Community	Property Services Manager	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

## TECHNICAL & ORGANISATIONAL SECURITY MEASURES

Directorate	Information Asset Owner	IT Systems	Security Measures	
Growth & Community	Head of IT & Transformation	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	
Growth & Community	Community Development Manager	Pentana - maintenance and administration	BS ISO/IEC 27001:2013 compliant	
Growth & Community	Property Services Manager	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.	
Housing & Public Protection	Community Safety Manager	CCTV – maintenance and administration	A key part of the Council's security setup	
Growth & Community	Property Services Manager	Disaster recovery	See Business Continuity Plan	

# CORPORATE PROPERTY - 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  ACMS UK Limited-property compliance vision platform  PSL Print Management	Pentana - BS ISO/IEC 27001:2013 compliant  Secure Waste Disposal – confidentiality clause in contract  SDC bulk printing SLA –includes confidentiality requirements  K&MISA – compliant  ACMS – compliant  PSL - compliant	N/A	N/A	YES – low - 2

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

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
Growth & Community	Customer Services Manager	<a href="#">Procedure/guidance</a> 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
Growth & Community	Customer Services Manager	<a href="#">Telephone recording</a> – outgoing & incoming calls	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	<a href="#">See Call Recording PN</a>	No	N/A	Audio	No
Growth & Community	Customer Services Manager	<a href="#">CCTV (Reception Area)</a> – for protection of staff, visitors & DBC assets/premises	Yes	31 days from date of recording (unless required for evidential purposes)	Common Practice	Secure disposal	Yes - images	Legal Obligation under health & safety legislation Legitimate Interest Public Interest Task	No	N/A	Digital Recording	No
Growth & Community	Customer Services Manager	<a href="#">CRM</a> - database of contacts and associated phone calls	Yes	15 months	Common Practice	Secure disposal and deletion of electronic records	Yes - identifiable natural persons only) - name, address, contact details	Legal Obligation under health & safety legislation Legitimate Interest Public Interest Task Consent	No	N/A	Electronic	No

<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



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

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
Growth & Community	Customer Services Manager	<a href="#">Customer satisfaction surveys</a>	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	Consent	No	N/A	Paper copy &/or electronically	
Growth & Community	Customer Services Manager	<a href="#">PV List Database</a> - 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	See <a href="#">Managing Customer Contact PN</a>	Yes – alleged offences	Substantial public interest (prevention/ detection of crime)	Electronic	No
Growth & Community	Customer Services Manager	<a href="#">Residents' Parking Scheme Scratch Card Allocation</a> – 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	Contract	No	N/A	Electronic	No

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

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
Growth & Community	Customer Services Manager	<b>Access to Civic Centre Control System</b> – 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	Legitimate Interest	No	N/A	Electronic	No
Growth & Community	Customer Services Manager	<b>Completed Secure Payment Envelopes &amp; Cheque Counterfoils, correspondence</b> – 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	Contract	No	N/A	Paper copy	No
Growth & Community	Customer Services Manager	<b>Performance Indicators</b> – 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
Growth & Community	Customer Services Manager	<b>General correspondence</b> – 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	Legal obligation under health & safety legislation Legitimate Interest Public Interest Task Consent	No	N/A	Paper copy/electronic	No

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

## TECHNICAL & ORGANISATIONAL SECURITY MEASURES

Directorate	Information Asset Owner	IT Systems	Security Measures	
Corporate Services	Head of IT & Transformation	<b>Computer systems/laptops/Internet</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	
Corporate Services	Head of IT & Transformation	<b>CRM</b> – maintenance and administration		
Growth & Community	Customer Services Manager	<b>Payment related sensitive data</b>	Capita - advanced income management	
Growth & Community	Customer Services Manager	<b>Telephone recording</b>	Specialist recording system, integrated with telephone system, providing controlled access to recordings to authorised persons only	
Growth & Community	Customer Services Manager	<b>On-line payments (hosted by Capita)</b>	PCIDSS compliant	
Growth & Community	Community Development Manager	<b>Pentana</b> – maintenance & administration	BS ISO/IEC 27001:2013 compliant	
Growth & Community	Customer Services Manager	<b>Pentana</b> – input of data –	Password administration	
Growth & Community	Customer Services Manager with IT Services support	<b>Disaster recovery</b>	See Business Continuity Plan	
Growth & Community	Customer Services Manager	<b>CCTV – Internal Civic Centre</b>	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) 2.Ombudsmen	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

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

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
Corporate Services	Democratic Services Manager	<b>Agenda and reports for meetings of the GAC, Cabinet, Committees Boards and Panels</b>	N/A	6 years (minimum)	Statutory	Archive electronically	No	N/A	No	N/A	Paper copies and held on Mod.Gov and Council web site and in electronic files	N/A
Corporate Services	Democratic Services Manager	<b>Exempt reports to committees</b>	N/A	6 years (minimum)	Statutory	Archive electronically	Yes – contact details such as name, title, addresses, telephone numbers & personal email addresses	Public interest task/legal obligation	Yes - •racial or ethnic origin/offences /criminal proceedings	Public interest task/legal obligation	Paper master copies and held on Mod.Gov. and in electronic files. Access restricted	N/A
Corporate Services	Democratic Services Manager	<b>Confidential reports to committees</b>	N/A	6 years (minimum)	Statutory	Archive electronically	Yes- contact details such as name, title, addresses, telephone numbers & personal email addresses/ financial details etc.	Public interest task/legal obligation	Yes – racial or ethnic origin/offences /criminal proceedings	Public interest task/legal obligation	Paper master copies and held on Mod.Gov and electronic files. Access restricted.	N/A

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

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 <sup>1</sup>
Corporate Services	Democratic Services Manager	<b>Confirmed Minutes for meetings of the GAC, Cabinet, Committees Boards and Panels</b>  <b>Draft Minutes</b>	N/A	6 years (minimum) Draft minutes will be retained until the minutes have been agreed, at the next following remote or physical meeting of the body concerned  In practice minutes are kept in perpetuity as they form the legal record of decisions taken and may have to be relied upon to justify historic decisions.	Statutory  Discretionary (draft minutes)	Archive	No	N/A	No	N/A	Signed copies held manually; electronic files and in Mod.Gov.	N/A
Corporate Services	Democratic Services Manager	<b>Register of Members' Interests</b>	N/A	Destroy 18 months after ceasing to hold office	Statutory	Secure disposal	Yes	Legal obligation	Yes – as prescribed by law	Legal obligation	Paper copy and electronically/ Published on the Council's website	N/A
Corporate Services	Democratic Services Manager	<b>Members' questionnaires</b> - request for personal information to enable performance of their duties as a Councillor	N/A	Destroy 18 months after ceasing to hold office	Common practice	Secure disposal	Yes - contact details such as name, title, addresses, telephone numbers & personal email addresses/ financial details etc.	Public interest (ancillary task)	No	N/A	Paper copy	N/A
Corporate Services	Democratic Services Manager	<b>Correspondence (general)</b> – emails, letters, memos etc.	N/A	1 year unless considered important for future reference	Common Practice	Secure disposal	No	Public interest (ancillary task)	No	N/A	Electronic	N/A
Corporate Services	Democratic Services Manager	<b>Petitions</b> - ePetitions and paper	N/A	3 months from date of report to committee (if applicable)	Common Practice	Secure destruction (shredding)	Yes	Public interest task	No	N/A	E-petitions hosted on web site  Paper petitions	N/A

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

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/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 <sup>2</sup>
Corporate Services	Democratic Services Manager	<b>Performance Indicators</b>	N/A	1 year from date of entry on Pentana	Common Practice	Disposal	No	N/A	No	N/A	Pentana	N/A
Corporate Services	Democratic Services Manager	<b>Partnerships, Agency &amp; External Meetings</b> – agenda, reports, minutes etc.	N/A	6 years (minimum)	Statutory	Archive electronically	No	N/A	No	N/A	Paper copy and held on Mod.Gov and Council web site and in electronic files	N/A
Corporate Services	Democratic Services Manager	<b>Equalities monitoring questionnaires - complaints process</b>	N/A	2 years	Common Practice	Disposal	No	N/A	Yes - anonymised	Section 149 Equality Act 2010 -Public Sector Equality Duty and Equality Act 2010 (Specific Duties and Public Authorities) Regulations 2017	Held in Pentana and in electronic files	N/A

### TECHNICAL & ORGANISATIONAL SECURITY MEASURES

Strategic Directorate	Information Asset Owner	IT Systems	Security Measures
Corporate Services	Democratic Services Manager	<b>Mod.Gov</b> - data input	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
Corporate Services	Head of IT & Transformation	<b>Computer systems/laptops/ Mod Gov/Internet</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
Corporate Services	Democratic Services Manager	<b>Internet</b> – input of data – the Democratic Services function	Dedicated IP address, up-to-date encryption protocols etc.
Growth & Community	Community Development Manager	<b>Pentana (Covalent)</b> – maintenance & administration	BS ISO/IEC 27001:2013 compliant

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

Corporate Services	Democratic Services Manager	<b>Pentana (Covalent)</b> – input of data – the Democratic Services function	Password administration

## 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	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.Councillors	N/A	NO	Pentana– Cloud based – retention only  Secure Waste Disposal - no processing - when confidential sacks handed over, limited to operatives putting papers in the shredding machine in back of lorry in Council car park  SDC bulk printing – no processing	Pentana - BS ISO/IEC 27001:2013 compliant  Secure Waste Disposal – confidentiality clause in contract  SDC bulk printing SLA	N/A	YES - MEDIUM



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	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	Electronic	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	Electronic	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	Electronic	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, disability	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	Yes -nationality, disability	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	11 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
		<b>Voter ID Certificates</b>												
		Scanned Applications	28 working days	Statutory	Secure disposal	Yes -name, DOB, Address, National Insurance Number, Photograph, Phone number, email address	Public interest task - Representation of the People Act 1983 - Representation of the People Regulations 2001- Legal obligation	No	N/A	No	ERO Portal	Digital Service/Department for Work & Pensions	Digital Service (DLUHC)	Data Sharing Agreement
		Online Applications	28 working days	Statutory	Archived	Yes -name, DOB, Address, National Insurance Number, Photograph, Phone number, email address	Public interest task - Representation of the People Act 1983 - Representation of the People Regulations 2001 - Legal obligation	No	N/A	No	ERO Portal	Digital Service/Department for Work & Pensions	Digital Service (DLUHC)	Data Sharing Agreement
		Refused applications (paper)	12 Months	Statutory	Secure disposal	Yes -name, DOB, Address, National Insurance Number, Photograph, Phone number, email address	Public interest task - Representation of the People Act 1983 - Representation of the People Regulations 2001- Legal obligation	No	N/A	No	Paper	N/A	N/A	N/A
		Original documents	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	Yes -nationality, disability	Substantial public interest -Representation of the People Act 1983 - Representation of the People Regulations 2001 - Legal obligation	No		N/A	N/A	N/A
		Electronic documents	Email for 12 months and copies taken and retained for 1 year form 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, disability	Substantial public interest -Representation of the People Act 1983 - Representation of the People Regulations 2001 - Legal obligation	No	Electronic	N/A	N/A	N/A
<b>ANNUAL CANVASS</b>														
Electoral Registration Officer		<b>Canvass Communication (CCA / CCB / Canvass Forms)</b>												
		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
		<b>Canvassers</b>												
		Communication 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	Paper copy secure disposal / Electronic version 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	Manually & Electronically (Eros)	N/A	N/A	N/A
		Proxy Applications	Until no longer an elector at registered address	Common Practice	Paper copy secure disposal / Electronic version 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- 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	Paper copy secure disposal / Electronic version 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- 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, <del>Neighbourhood Planning</del>	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)

## Information Asset Owner – Head of Environmental Health and Regulatory Services

Directorate	Information Asset Owner	Record/Information Description	DPIAs <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 Paper copy and/or on electronic systems (including mobile devices)	Children (under 13) – parental consent normally required
Housing & Public Protection	Head of Environmental Health & Regulatory Services	<b>Emergency Planning</b> 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
Housing & Public Protection	Licensing and Emergency Planning Officer	<b>Emergency Planning Response</b> –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
Housing & Public Protection	Community Safety Manager	<b>CCTV (installed in the Borough of Dartford and outside Council premises) and processing of images</b>	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

<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

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

## Information Asset Owner – Head of Environmental Health and Regulatory Services

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
Housing & Public Protection	Community Safety Manager	<a href="#">CCTV Activity Log</a>	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
Enforcement & Regulatory Services	Head of Environmental Health & Regulatory Services	<a href="#">Local Government &amp; Social Care Ombudsman</a> – 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
Housing & Public Protection	Community Safety Manager	<a href="#">RIPA - authorisations database</a>	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)

## Information Asset Owner – Head of Environmental Health and Regulatory Services

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
Housing & Public Protection	Community Safety Manager	<b>Community Safety</b> - 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
Housing & Public Protection	Community Safety Manager	<b>Public Spaces Protection Order offences</b> - 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
Housing & Public Protection	Licensing Manager	<b>Charity Street Collections</b> – 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)

## Information Asset Owner – Head of Environmental Health and Regulatory Services

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
Housing & Public Protection	Licensing Manager	<a href="#">Licensing (Hackney Carriage &amp; Private Hire)</a> – 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
Housing & Public Protection	Licensing Manager	<a href="#">Licensing (Hackney Carriage &amp; Private Hire)</a> – 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

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

Information Asset Owner – Head of Environmental Health and Regulatory Services

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
Housing & Public Protection	Licensing Manager	<b>Licensing (Hackney Carriage &amp; Private Hire) – TMBC and NAFN (NR3 and NR3S databases)</b> - information received relating to licensed Hackney Carriage and Private Hire Drivers	N/A	Written record of:  NR3 Register search - 25 years;  Requests made to us, by another licensing authority - 25 years;  Requests made by us to another licensing authority, following discovery of a 'match' by us in the NR3 Register -25 years;  Any information that is received by us from any other licensing authority in relation to an application - 35 days (calculated from the date of the service of the written notification of the application by us)  Litigation proceedings, for 35 days after the date of determination or withdrawal of the proceedings.	Common Practice	Secure disposal	Yes (identifiable natural persons only) - name, address, contact details,	Public interest task - Town and Police Clauses Act 1847 Local Government (Miscellaneous Provisions) Act 1976	Yes – offences (including alleged offences) criminal proceedings outcomes and sentences (as applicable) Revocation of licences by other Licensing Authorities	Substantial public interest Town and Police Clauses Act 1847 Local Government (Miscellaneous Provisions) Act 1976-	Electronically	N/A



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

## Information Asset Owner – Head of Environmental Health and Regulatory Services

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
Housing & Public Protection	Licensing Manager	<b>Licensing Act 2003 (Alcohol) (Late night refreshment) &amp; (Regulated Entertainment)</b> – 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
Housing & Public Protection	Licensing Manager	<b>Gambling Act 2005</b> - 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
Housing & Public Protection	Licensing Manager	<b>Scrap Metal Dealers Act 2013</b> - 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
Housing & Public Protection	Licensing Manager	<b>Licensing Fees</b> – schedule of	N/A	Supersedes preceding version	Common Practice	Archive	No	N/A	No	N/A	Paper copy & Electronically	N/A

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

## Information Asset Owner – Head of Environmental Health and Regulatory Services

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
Housing & Public Protection	Licensing Manager	<a href="#">Statements' of Licensing Policy</a>	N/A	Supersedes preceding version	Common Practice	Archive	No	N/A	No	N/A	Paper copy & Electronically	N/A
Housing & Public Protection	Community Safety Manager	<a href="#">Dartford Town Against Crime (DTAC) Scheme</a> - 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
Housing & Public Protection	Community Safety Manager	<a href="#">ShopSafe ID Scheme</a>	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
Housing & Public Protection	Enforcement Manager	<a href="#">Litter Enforcement</a> – 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

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

## Information Asset Owner – Head of Environmental Health and Regulatory Services

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
Housing & Public Protection	Enforcement Manager	<b>Environmental Crime Enforcement</b> - 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
Housing & Public Protection	Parking Services Manager	<b>Car Parking Enforcement</b> – case file material – instructions, court orders, Penalty Charge Notices etc. PCN Schedule  <b>Body Camera Footage and Vehicle Dashcam</b> – images and audio	N/A	4 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 – Traffic Management Act 2004 & The Civil Enforcement of Road Traffic Contraventions (Approved devices, Charging Guidelines and General Provisions) (England) Regulations 2022	Electronically in 3Sixty	N/A

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

Information Asset Owner – Head of Environmental Health and Regulatory Services

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
Housing & Public Protection	Parking Services Manager	<b>Resident permits, Business permits, dispensations, resident exceptions, season permits.</b>  <b>Car Parking Visitors Scratch Cards</b>	N/A	All these permits and associated details will be retained for <b>4 Years</b>  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	Electronically in 3Sixty  N/A for Parking Services. Finance and Customer Services keep their information	N/A
Housing & Public Protection	Head of Environmental Health & Regulatory Services	<b>Correspondence (general)</b> – 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
Housing & Public Protection	Community Safety Manager	<b>CSU Daily Tasking</b> – 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)

Information Asset Owner – Head of Environmental Health and Regulatory Services

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
Housing & Public Protection	Head of Environmental Health & Regulatory Services	<b>Events' Notifications-</b> 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)

Information Asset Owner – Head of Environmental Health and Regulatory Services

Housing & 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) -
Housing & Public Protection	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)

Information Asset Owner – Head of Environmental Health and Regulatory Services

## TECHNICAL & ORGANISATIONAL SECURITY MEASURES

Directorate	Information Asset Owner	IT Systems	Security Measures	
Corporate Services	Head of IT & Transformation	<a href="#">Idox/UNIFORM and department computers and laptops/on-line/telephone payment systems</a> – 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	
Growth & Community	Community Development Manager	<a href="#">Pentana</a> – maintenance & administration	BS ISO/IEC 27001:2013 compliant	
Housing & Public Protection	Head of Environmental Health & Regulatory Services	<a href="#">Idox/UNIFORM/ /Pentana and computers and laptops/Internet/ Intranet</a> - – input of data – the enforcement & regulatory function	Use of passwords	
Growth & Community	Customer Services Manager	<a href="#">On-line payments (hosted by Capita</a>	PCIDSS compliant	
Housing & Public Protection	Head of IT & Transformation	<a href="#">Disaster recovery</a>	See Business Continuity Plan	
Housing & Public Protection	Community Safety Manager	<a href="#">External CCTV</a> - maintenance & administration	A key part of the Council's security setup	

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

Information Asset Owner – Head of Environmental Health and Regulatory Services

## AUTOMATED DECISION MAKING

Directorate	Information Asset Owner	DPIA	Record/Information/ description	DPA requirements
Housing & Public Protection	Licensing Manager	Yes	<a href="#">Taxi/private hire drivers' English tests (Varsent)</a>	The legitimate interests of the individual are safeguarded by allowing the individual to appeal the decision

## 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 12 Tameside Metropolitan Borough Council and NAFN (for NR3 and NR3 databases' processing)	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  Body Worn Cameras  LA Support Ltd (Fixed Penalty Notices - littering& dog control)	Pentana - BS ISO/IEC 27001:2013 compliant  Secure Waste Disposal – confidentiality clause in contract  K&MISA- - compliant  Dartford CCTV Code of Practice - compliant  CCTV Code of Practice - compliant  LA Support Ltd - compliant	N/A	N/A	Enforcement, Parking Services, Licensing & Community Safety – Medium – risk score - 4  Town Centre Management – Low - risk score - 2



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

Information Asset Owner – Head of Environmental Health and Regulatory Services

				Stanford & Green Ltd (Bailiffs) –parking contravention enforcement	Stanford & Green Ltd (Bailiffs) – compliant			
				Newlyn PLC (Debt Recovery))	Newlyn PLC - compliant			
				Park- Mobile UK Ltd (cashless parking)	Park-Mobile UK Ltd compliant			

# ENVIRONMENTAL HEALTH - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

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
Housing & Public Protection	Head of EH&RS	<b>Procedure/guidance</b> on a range of environmental health related matters Use of RIAMS as an up to date procedural library	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
Housing & Public Protection	EH Team Manager - Commercial	<b>Food Premises Inspections</b> - 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
Housing & Public Protection	EH Team Manager - Commercial	<b>Approved food premises inspections</b> – 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
Housing & Public Protection	Head of EH&RS <sup>2</sup>	<b>Service Requests</b> –all, commercial, ancillary investigation enquiries	N/A	5 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
Housing & Public Protection	EH Team Manager - Commercial	<b>Notifications from Public Health England</b> - food poisoning food borne infections, infectious diseases, notifiable diseases etc.	N/A	1 year	Set by UK Health Security Agency 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) and 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	Electronic	Yes – with parental consent

<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

<sup>2</sup> Head of Environmental Health and Regulatory Services

# ENVIRONMENTAL HEALTH - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

										Hygiene (England) Regulations 2013		
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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
Housing & Public Protection	EH Team Manager - Commercial	<a href="#">Outbreak Notifications from UKHSA</a>	N/A	8 years if no children involved  25 years if children involved	Set by UKHSA 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
Housing & Public Protection	EH Team Manager - Commercial	<a href="#">Food hygiene training</a> – qualification- food business employees	N/A	5 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
Housing & Public Protection	EH Team Manager - Commercial	<a href="#">RIDDOR</a> – 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
Housing & Public Protection	EH Team Manager - Commercial	<a href="#">LOLERS (Lifting Operations &amp; Lifting Equipment Regulations 1998</a> - (defect notifications)	N/A	7years	Statutory	Secure Disposal	No	N/A	No	N/A	Electronic	N/A
Housing & Public Protection	EH Team Manager - Commercial	<a href="#">Cooling Towers' Register</a>	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	No	N/A	Electronic- public record on request	N/A

# ENVIRONMENTAL HEALTH - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

								Regulations 1992				
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
Housing & Public Protection	EH Team Manager - Commercial	<b>Childminders</b> - 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
Housing & Public Protection	EH Team Manager - Commercial	<b>Health &amp; Safety at Work</b> - 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
Housing & Public Protection	EH Team Manager - Commercial	<b>Skin piercing activities</b> - 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
Housing & Public Protection	EH Team Manager – Environmental Protection	<b>Contaminated Land</b> <ul style="list-style-type: none"> <li>• Site Surveys</li> <li>• Sample results</li> <li>• Consultant advice</li> <li>• Records of works</li> <li>• Records of legal actions</li> <li>• Correspondence</li> </ul>	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
Housing & Public Protection	EH Team Manager – Environmental Protection	<b>Animal Licences</b> - <ul style="list-style-type: none"> <li>• Boarding Kennels</li> <li>• Catteries</li> <li>• Dangerous Wild Animals</li> <li>• Riding Establishments</li> <li>• Zoo</li> </ul>	N/A	Superseded by current version	Statutory	To be kept indefinitely	Yes - (identifiable natural persons only) – name, address, contact details	Public interest task – The Animal Welfare Act 2006, The Animal Welfare (Licensing of Activities involving animals) (England) Regulations 2018	No	N/A	Electronic (uniform/s:\)	N/A

# ENVIRONMENTAL HEALTH - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

								Dangerous Wild Animals Act 1976 Zoo Licensing Act 1981				
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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
Housing & Public Protection	EH Team Manager – Environmental Protection	<b>Stray Dog Register</b> - data collected by 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
Housing & Public Protection	EH Team Manager - Commercial	<b>Primary Authority</b> - 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
Housing & Public Protection	Head of EH&RS	<b>Legal Notices –</b> 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
Housing & Public Protection	Head of EH&RS	<b>Customer Surveys</b>	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
Housing & Public Protection	EH Team Manager – Environmental Protection	<b>Audio Recordings –</b> noise, disclosure forms etc.	N/A	Whilst relevant to ongoing enforcement action then 2 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
Housing & Public Protection	Head of EH&RS	<b>Local Government &amp; Social Care Ombudsman</b> – case file material -	N/A	1 year from date of case closure unless exceptional circumstances	Common Practice	Secure Disposal	Yes - (identifiable natural persons only) - name ,	Public interest task/legal obligation – Local Government Act 1974	Yes- health data, offences (including	Substantial public interest – Section 26(5) Local Government Act 1974	Paper copy &/or electronic - ldox	N/A

# ENVIRONMENTAL HEALTH - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

		complaints received and outcomes		require longer retention e.g. pending court case			address, contact details		alleged offences) etc.			
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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
Housing & Public Protection	Head of EH&RS	<b>Photographic Evidence of condition of premises</b> – case file – correspondence etc.	N/A	Whilst relevant to ongoing enforcement action then 2 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:\)	N/A
Housing & Public Protection	EH Team Manager – Environmental Protection	<b>EARS Daily Tasking</b> – notes of meeting MARAC – Multi agency risk assessment conference	N/A	Reviewed and then destroyed Deleted from emails immediately.	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
Housing & Public Protection	Head of EH&RS	<b>Events' Notifications-</b> 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 - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

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
Housing & Public Protection	Head of EH&RS <sup>3</sup>	<b>General correspondence</b> – emails, memos, letters etc. not associated with service requests	N/A	18 months – must be filed on Idox if considered important for future reference	Common Practice	Disposal/ permanent deletion	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
Housing & Public Protection	EH Team Manager - Commercial	<b>Food Registration – business premises</b>	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
Housing & Public Protection	Head of EH&RS	<b>Performance Indicators</b>	N/A	1 year from date of entry on Pentana	Common Practice	Disposal	No	N/A	No	N/A	Electronic - on Pentana	N/A
Housing & Public Protection	Head of EH&RS	<b>Note Books</b> – site visit inspections	N/A	2 years from date of last inspection noted in the book. (unless being used in court proceedings)	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

<sup>3</sup> Head of Environmental Health and Regulatory Services

# ENVIRONMENTAL HEALTH - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

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) -
Housing & Public Protection	Head of EH&RS	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 - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

## TECHNICAL & ORGANISATIONAL SECURITY MEASURES

Strategic Directorate	Information Asset Owner	IT Systems	Security Measures	
Corporate Services	Head of IT and Transformation	<a href="#">Idox/UNIFORM Academy and department computers and laptops/internet /intranet</a> – 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	
Growth & Community	Community Development Manager	<a href="#">Pentana</a> – maintenance & administration	BS ISO/IEC 27001:2013 compliant	
Corporate Services	Customer Services Manager	<a href="#">On-line payments (hosted by Capita)</a>	PCIDSS compliant	
Corporate Services	Head of IT and Transformation	<a href="#">Stay Connected email alerts (DBC website)</a>	Subscriber own password – unsubscribe at any time	
Housing & Public Protection	Head of EH&RS	<a href="#">Idox/UNIFORM Academy/Pentana and computers and laptops/internet/ /intranet</a> – input of data – the environmental health function	Use of passwords	
Housing & Public Protection	EH Team Manager – Environmental Protection	<a href="#">ERG</a>	Public access through secure website – password protected –ERG controlled	
Housing & Public Protection	Head of EH&RS	<a href="#">Disaster recovery</a>	See Business Continuity Plan	

# ENVIRONMENTAL HEALTH - 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 UKHSA 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 14. BEIS 15. DEFRA	N/A	N/A	Pentana – Cloud based – retention only  Secure Waste Disposal - no processing –  SDC/DBC Partnership Agreement  Kent & Medway Information Sharing Agreement  Pest Control - pest inspection, exterminator, animal control  Davenden Kennelling Contract  RIAMS and Noise App Contract	Pentana - BS ISO/IEC 27001:2013 compliant – not managed by EH  Secure Waste Disposal – confidentiality clause in contract –not managed by EH  Partnership Agreement  KMISA -compliant  Compliant  Davenden Kennelling – Compliant  RIAMS and Noise App contract - compliant	N/A  N/A  N/A  N/A  N/A  N/A	N/A  N/A  N/A  N/A  N/A	Yes (corporate)  Yes (corporate)  Yes(corporate)  Yes(corporate)  Yes -10  Yes- 10  Yes- 5

# FINANCIAL SERVICES - INFORMATION ASSET REGISTER

Directorate	Information Asset Owner	Record/Information Description	DPIAs <sup>1</sup>	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
<b>Budget</b>												
Corporate Services	Head of Finance	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
Corporate Services	Head of Finance	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
Corporate Services	Head of Finance	Annual Budget Plan	N/A	3 years	Common Practice	Secure Disposal	No	N/A	No	N/A	Electronic	No
Corporate Services	Head of Finance	Budget Preparation	N/A	3 years	Common Practice	Secure Disposal	No	N/A	No	N/A	Electronic	No
Corporate Services	Head of Finance	Budget Planning documents	N/A	4 years	Common Practice	Secure Disposal	No	N/A	No	N/A	Electronic	No
Corporate Services	Head of Finance	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

<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

# FINANCIAL SERVICES - INFORMATION ASSET REGISTER

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												
Corporate Services	Head of Finance	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
Corporate Services	Head of Finance	Revenue Budget Files	N/A	4-Current year plus 6 years	Common Practice	Secure Disposal	No	N/A	No	N/A	Electronic	No
Corporate Services	Head of Finance	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
Corporate Services	Head of Finance	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
Corporate Services	Head of Finance	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
Corporate Services	Head of Finance	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
Corporate Services	Head of Finance	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
Corporate Services	Head of Finance	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

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												
Corporate Services	Head of Finance	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
Corporate Services	Head of Finance	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
Corporate Services	Head of Finance	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
Corporate Services	Head of Finance	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
Corporate Services	Head of Finance	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
Corporate Services	Head of Finance	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
Corporate Services	Head of Finance	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

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												
Corporate Services	Head of Finance	MTFP		Current year plus 6 years	Common Practice	Secure Disposal	No	N/A	No	N/A	Electronic	No
Corporate Services	Head of Finance	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												
Corporate Services	Head of Finance	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
Corporate Services	Head of Finance	Delivery notes, confirmations of orders	N/A	Current year + 1 year	Common Practice	Secure Disposal	No	N/A	No	N/A	Manual/Electronic	No
Corporate Services	Head of Finance	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
Corporate Services	Head of Finance	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
Corporate Services	Head of Finance	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

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												
Corporate Services	Head of Finance	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
Corporate Services	Head of Finance	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
Corporate Services	Head of Finance	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
Corporate Services	Head of Finance	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
Corporate Services	Head of Finance	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

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												
Corporate Services	Head of Finance	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
Corporate Services	Head of Finance	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
Corporate Services	Head of Finance	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
Corporate Services	Head of Finance	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
Corporate Services	Head of Finance	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
Corporate Services	Head of Finance	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
Corporate Services	Head of Finance	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
Corporate Services	Head of Finance	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
Corporate Services	Head of Finance	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

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
<b>Financial Records</b>												
Corporate Services	Head of Finance	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
Corporate Services	Head of Finance	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
<b>Financial Strategy</b>												
Corporate Services	Head of Finance	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
<b>Governance</b>												
Corporate Services	Head of Finance	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
Corporate Services	Head of Finance	External Audit inspection reports	N/A	Closure + 5 years	Common Practice	Secure Disposal	No	N/A	No	N/A	Electronic	No
Corporate Services	Head of Finance	External Audit Letters	N/A	Closure + 5 years	Common Practice	Secure Disposal	No	N/A	No	N/A	Electronic	No
<b>Grants</b>												
Corporate Services	Head of Finance	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
Corporate Services	Head of Finance	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

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
<b>Insurance</b>												
Corporate Services	Head of Finance	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
Corporate Services	Head of Finance	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
Corporate Services	Head of Finance	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
Corporate Services	Head of Finance	Insurance policies relating to insurance purchased by DBC to cover its activities		Date of expiry of policy + 6 years	Employers Liability/ Financial Regulations	Secure Disposal	No	N/A	No	N/A	Electronic	No
Corporate Services	Head of Finance	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
Corporate Services	Head of Finance	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

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
<b>Insurance</b>												
Corporate Services	Head of Finance	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
Corporate Services	Head of Finance	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
<b>Monitoring</b>												
Corporate Services	Head of Finance	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
Corporate Services	Head of Finance	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
Corporate Services	Head of Finance	Budget Monitoring Reports	N/A	Current year plus 6 years	Common Practice	Secure Disposal	No	N/A	No	N/A	Manual/Electronic	No
Corporate Services	Head of Finance	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
Corporate Services	Head of Finance	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
<b>Payroll</b>												
Corporate Services	Head of Finance	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
Corporate Services	Head of Finance	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

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												
Corporate Services	Head of Finance	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
Corporate Services	Head of Finance	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
Corporate Services	Head of Finance	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
Corporate Services	Head of Finance	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

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
Corporate Services	Head of Finance	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
Corporate Services	Head of Finance	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
Corporate Services	Head of Finance	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
Corporate Services	Head of Finance	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
Corporate Services	Head of Finance	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

Procurement												
Corporate Services	Head of Finance	Financial vetting of companies	N/A	Life of contract	Common Practice	Secure Disposal	No	N/A	No	N/A	Electronic	No
Corporate Services	Head of Finance	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
Corporate Services	Head of Finance	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
Corporate Services	Head of Finance	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
Corporate Services	Head of Finance	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
Corporate Services	Head of Finance	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
Corporate Services	Head of Finance	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

Directorate	Information Asset Owner	Record/Information Description	DPIAs <sup>2</sup>	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												
Corporate Services	Head of Finance	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
Corporate Services	Head of Finance	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
Corporate Services	Head of Finance	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
Corporate Services	Head of Finance	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
Corporate Services	Head of Finance	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
Corporate Services	Head of Finance	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

<sup>2</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

# FINANCIAL SERVICES - INFORMATION ASSET REGISTER

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
<b>Treasury</b>												
Corporate Services	Head of Finance	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
Corporate Services	Head of Finance	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
Corporate Services	Head of Finance	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
Corporate Services	Head of Finance	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
<b>Misc.</b>												
Corporate Services	Head of Finance	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
Corporate Services	Head of Finance	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

## TECHNICAL & ORGANISATIONAL SECURITY MEASURES

Directorate	Information Asset Owner	IT Systems	Security Measures
Corporate Services	Head of IT & Transformation	<a href="#">Idox and department computers and laptops/internet /intranet</a> – 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
Corporate Services	Head of Finance	<a href="#">Idox/Pentana/Intranet/Internet and computers and laptops</a> - 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.
Growth & Community	Customer Services Manager	<a href="#">On-line payments (hosted by Capita)</a>	PCIDSS compliant
Growth & Community	Customer Services Manager	<a href="#">AIMS – income management system</a> – 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
Growth & Community	Community Development Manager	<a href="#">Pentana</a> – maintenance & administration	BS ISO/IEC 27001:2013 compliant
Corporate Services	Head of Finance	<a href="#">ProContract</a>	
Corporate Services	Head of Finance with IT Services support	<a href="#">eFinancials</a> - 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
Corporate Services	Head of Finance with IT Services support	<a href="#">eProcurement</a> - 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
Corporate Services	Head of Finance with IT Services support	<a href="#">Logotec</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, DPA contract provisions
Corporate Services	Head of Finance with IT Services support	<a href="#">Systems Link</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, DPA contract provisions

## FINANCIAL SERVICES - INFORMATION ASSET REGISTER

Directorate	Information Asset Owner	IT Systems	Security Measures
Growth & Community	Customer Services Manager with IT Services support	Disaster recovery	See Business Continuity Plan

### 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/DSAs	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 11. BEIS	Analyse LOCAL – analysis of property & historical rating information to prepare estimate of business rate income for the forthcoming financial year	N/A	N/A	Pentana – Cloud based – retention only  Secure Waste disposal  Analyse LOCAI – 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)

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 <sup>1</sup>	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
Housing & Public Protection	Housing Maintenance Manager	<a href="#">Procedure/guidance</a> 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/ Housing & Public Protection	Housing Maintenance Manager	<a href="#">Planned/responsive maintenance procurement</a> – 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
Housing & Public Protection	Housing Maintenance Manager	<a href="#">Surveys</a> - 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
Housing & Public Protection	Housing Maintenance Manager	<a href="#">Asbestos Register and Management Plans</a> - 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/ Housing & Public Protection	Asset Holding Managers	<a href="#">Fire Certificates</a> - 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/ Housing & Public Protection	Asset Holding Managers	<a href="#">Electrical installation Certificates</a> – 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/ Housing & Public Protection	Asset Holding Managers	<a href="#">Energy Management</a> – 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/ Housing & Public Protection	Asset Holding Managers	<a href="#">Equipment Testing</a> – 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)

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
Housing & Public Protection	Housing Maintenance Manager	<b>Repairs &amp; maintenance of Council housing stock</b> – 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
Housing & Public Protection	Housing Maintenance Manager	<b>Waiting lists for sensitive planned works</b> - 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
Housing & Public Protection	Housing Maintenance Manager	<b>Planned/responsive maintenance repair - requests to</b> 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
Housing & Public Protection	Housing Maintenance Manager	<b>Gas Safety Checks' Certificates</b>	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
Housing & Public Protection	Housing Maintenance Manager	<b>Fire Risk Assessments</b>	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
Housing & Public Protection	Housing Maintenance Manager	<b>Legionella Risk Assessments</b>	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)

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
Housing & Public Protection	Housing Maintenance Manager	<b>Performance Indicators</b>	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
Housing & Public Protection	Housing Maintenance Manager	<b>Correspondence (general)</b> - 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
Housing & Public Protection	Housing Maintenance Manager	<b>Disabled Adaptation recommendations</b>	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
Housing & Public Protection	Housing Maintenance Manager	<b>Safeguarding Referrals</b> - 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
Housing & Public Protection	Housing Maintenance Manager	<b>PV Register notifications</b>	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)

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 <sup>ii</sup>	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
Housing & Public Protection	Head of Housing	<b>Councillor &amp; MP Enquiries</b>	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 & Public Protection	Head of Housing	<b>Housing Ombudsman &amp; Local Government &amp; Social Care Ombudsman</b> - 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
Housing & Public Protection	Head of Housing	<b>Complaints</b> – 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
Housing & Public Protection	Head of Housing	<b>Telephone recording – outgoing &amp; incoming calls to DBC Housing staff for quality and training purposes</b>	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

Directorate	Information Asset Owner	IT Systems	Security Measures
Corporate Services	Head of IT & Transformation	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
Corporate Services	Head of IT & Transformation	Secure transfer of data between DBC & Contractors	Data encryption, crypto cards
Housing & Public Protection	Housing Maintenance Manager	Idox/UNIFORM/Academy and computers and laptops/Internet/Intranet/Pentana - – input of data – corporate property maintenance functions	Use of passwords
Growth & Community	Community Development Manager	Pentana – maintenance & administration	BS ISO/IEC 27001:2013 compliant
Growth & Community	Customer Services Manager	On-line payments (hosted by Capita)	PCIDSS compliant
Housing & Public Protection	Housing Maintenance Manager	Disaster recovery	See Business Continuity Plan

# 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  Secure Parking and Storage (SPS)  Sureserve Fire and Electrical  Riverside Environmental  Clifford Devlin	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  SPS compliant  Sureserve compliant  Riverside Compliant  Clifford Devlin Compliant	N/A	YES –High - Score - 9



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

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
Housing and Public Protection	Head of Housing	<a href="#">First Homes applications, Authority to Exchange and Compliance Certificates</a>	N/A	Until the First Home is sold to another qualifying purchaser	Common Practice	Secure disposal	Yes (identifiable natural persons only) - name, address, contact details	Public interest task/legal obligation to process First Homes applications/re sales	Yes - – racial or Ethnic origin, bank statements/ proof of earnings	Legal obligation under Government Planning policy dated 28.6.21.	Held electronically on personal drive	N/A
Housing & Public Protection	Head of Housing	<a href="#">Policy and guidance</a> - 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
Housing & Public Protection	Head of Housing	<a href="#">Appeals against banding assessment/access to housing register</a> – 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
Housing & Public Protection	Head of Housing	<a href="#">Request for a review of suitability of accommodation</a> – 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

<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

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

Directorate	Information Asset Owner	Record/Information Description	DPIA <sup>2</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
Housing & Public Protection	Head of Housing	<b>Performance Indicators</b> - for the Housing Service	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
Housing & Public Protection	Head of Housing	Government statistical returns covering the whole of housing service	N/A	1 year from date of entry on DLUHC website	Statutory	Disposal	No	N/A	No	N/A	Electronic – anonymised data on DLUHC website	N/A
Housing & Public Protection	Head of Housing	<b>Registration of individuals' housing applications</b> – 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
Housing & Public Protection	Head of Housing	<b>Correspondence (general)</b> – 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

<sup>2</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

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

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
Housing and Public Protection	Head of Housing	Responses from public on housing policy consultations	N/A	Until Policy is approved by Cabinet	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
Housing & Public Protection	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 & Public Protection	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 & Public Protection	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
Housing & Public Protection	Head of Housing	Custom and Self Build Register – Application form and supporting information	N/A	Up to 10 years or earlier if land for self build is secured by applicant	Common Practice	Secure Disposal	Yes, name address, contact details. Proof of address and ID	Public interest task pursuant to the Self-build and Custom Housebuilding (Register) Regulations 2016	No	N/A	Electronic	N/A

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

## TECHNICAL & ORGANISATIONAL SECURITY MEASURES

Directorate	Information Asset Owner	IT Systems	Security Measures
Corporate Services	Head of IT & Transformation	<a href="#">Idox/Academy and department computers and laptops/internet/intranet</a> –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
Growth & Community	Community Development Manager	<a href="#">Pentana</a> – maintenance & administration	BS ISO/IEC 27001:2013 compliant
Housing & Public Protection	Head of Housing	<a href="#">Idox/UNIFORM Academy/Pentana and computers and laptops/internet/intranet</a> – the housing policy & development function	Use of passwords
Housing & Public Protection	Head of Housing	<a href="#">Locata</a> <sup>3</sup> - available Council properties advertised on Locata website	ISA - use of passwords by applicants - no access to data by other Kent authorities - authorised users only
Housing & Public Protection	Head of Housing	<a href="#">BPHA</a> - home ownership and rental options	Use of password by applicants and BPHA only
Housing & Public Protection	Head of Housing	<a href="#">Disaster recovery</a>	See Business Continuity Plan

<sup>3</sup> From 2 July 2023 - Huume

# 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  Kenthorne Choice Partnership Protocol (for Locata)	Pentana - BS ISO/IEC 27001:2013 compliant  Secure Waste Disposal – confidentiality clause in contract  KMISA - compliant  Kenthorne Choice Partnership Protocol) – reviewed - compliant	N/A	YES – High – Score 9

# HOUSING SCHEMES & LEASEHOLD FINANCE - INFORMATION ASSET REGISTER (ROPA)

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
Housing & Public Protection	Head of Housing	<b>Policies/Strategies</b> 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
Housing & Public Protection	Head of Housing	<b>The process for applying for specialist accommodation in housing schemes. (successful &amp; unsuccessful applications)</b> - 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
Housing & Public Protection	Head of Housing	<b>The process for managing the tenancy of an individual</b> - 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

<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

# HOUSING SCHEMES & LEASEHOLD FINANCE - INFORMATION ASSET REGISTER (ROPA)

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
Housing & Public Protection	Head of Housing	<b>Garage rental applications</b> - 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 task pursuant to: Housing Act 1985 Housing Act 1996	No	N/A	Paper copy &/or electronic in Idox	N/A
Housing & Public Protection	Head of Housing	<b>Court Orders</b> – leaseholders case files	N/A	Life of tenancy	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 - offences	Substantial public interest pursuant to Housing Act 1985 Housing Act 1996 Legal claims	Paper copy &/or electronic in Idox	N/A
Housing & Public Protection	Head of Housing	<b>Procurement</b> - 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 task pursuant to: Housing Act 1985 Housing Act 1996	No	N/A	Paper copy and/or electronic	N/A
Housing & Public Protection	Head of Housing	<b>Resident meetings</b> - minutes	N/A	1 year from date of meeting	Common Practice	Secure Disposal	No	N/A	No	N/A	Paper copy & electronic	N/A
Housing & Public Protection	Head of Housing	<b>Leasehold tenancies</b> - – 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 task pursuant to: Housing Act 1985 Housing Act 1996	Yes – possibly health data etc. although sensitive data is not collected routinely	Substantial public interest pursuant to Housing Act 1985 Housing Act 1996	Paper copy &/or electronic in Idox	N/A

# HOUSING SCHEMES & LEASEHOLD FINANCE - INFORMATION ASSET REGISTER (ROPA)

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
Housing & Public Protection	Head of Housing	<b>Age-specific Care &amp; Welfare Referrals</b> - 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
Housing & Public Protection	Head of Housing	<b>Correspondence (general)</b> – 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
Housing & Public Protection	Head of Housing	<b>Councillor &amp; MP Enquiries</b>	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 & Public Protection	Head of Housing	<b>Right-to Buys</b> - 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 & LEASEHOLD FINANCE - INFORMATION ASSET REGISTER (ROPA)

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
Housing & Public Protection	Head of Housing	<b>Housing Ombudsman &amp; Local Government &amp; Social Care Ombudsman</b> - 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
Housing & Public Protection	Head of Housing	<b>Dartford Private Leasing Scheme Lease Agreements</b> – 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
Housing & Public Protection	Head of Housing	<b>Community Centres Bookings</b> – 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
Housing & Public Protection	Head of Housing	<b>Performance Indicators</b> –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 & LEASEHOLD FINANCE - INFORMATION ASSET REGISTER (ROPA)

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) -
Housing & Public Protection	Head of Housing	<b>MAPPA<sup>2</sup>/MARAC<sup>3</sup> and Safeguarding Referrals (children &amp; adults at risk)</b> - 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 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
Housing & Public Protection	Head of Housing	<b>Complaints</b> – 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

<sup>2</sup> Multi-Agency Public Protection Arrangements

<sup>3</sup> Multi- Agency Risk Assessment Conference

# HOUSING SCHEMES & LEASEHOLD FINANCE - INFORMATION ASSET REGISTER (ROPA)

## TECHNICAL & ORGANISATIONAL SECURITY MEASURES

Directorate	Information Asset Owner	IT Systems	Security Measures
Corporate Services	Head of IT & Transformation	<b>Idox/UNIFORM/ Capita Housing 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 & DPA contract provisions.
Growth & Community	Community Development Manager	<b>Pentana</b> – maintenance & administration	BS ISO/IEC 27001:2013 compliant
Housing & Public Protection	Head of Housing	<b>Idox/UNIFORM Capita Housing/ Pentana and computers and laptops /internet/intranet-</b> – input of data – the housing schemes & finance function	Use of passwords
Housing & Public Protection	Head of Housing	<b>Business &amp; Disaster recovery</b>	See Business Plan

# HOUSING SCHEMES & LEASEHOLD FINANCE - INFORMATION ASSET REGISTER (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 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.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	Pentana – Cloud based – retention only  Secure Waste Disposal - no processing  SDC bulk printing – no processing  Tunstall Healthcare Ltd (out of hours call centre)r  Pinnacle PSG  Kent & Medway Information Sharing Agreement	Pentana - BS ISO/IEC 27001:2013 compliant  Secure Waste Disposal – confidentiality clause in contract  SDC bulk printing SLA –includes confidentiality requirements  Tunstall Healthcare Ltd - compliant  Pinnacle PSG - compliant  Compliant	NO	N/A	Yes – high-score 9

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

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
Housing & Public Protection	Head of Housing	<b>Procedure/guidance</b> - 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
Housing & Public Protection	Head of Housing	<b>The process for applying for council housing (successful &amp; unsuccessful applications)</b> - 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
Housing & Public Protection	Head of Housing	<b>Downsize for Cash Scheme</b> - 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

<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

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

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
Housing & Public Protection	Head of Housing	<b>The process of awarding tenancies in council housing</b> – 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
Housing & Public Protection	Head of Housing	<b>Homelessness</b> – case file material including decisions <b>Temporary Accommodation</b> and relevant documentation <b>Homeless Prevention activity</b> 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
Housing & Public Protection	Head of Housing	<b>Dartford Private Sector Leasing Scheme</b> - 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)

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
Housing & Public Protection	Head of Housing	<b>Housing Ombudsman &amp; Local Government &amp; Social Care Ombudsman</b> - 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
Housing & Public Protection	Head of Housing	<b>Complaints</b> – 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
Housing & Public Protection	Head of Housing	<b>Performance Indicators</b> – 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
Housing & Public Protection	Head of Housing	<b>General Correspondence</b> – 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
Housing & Public Protection	Head of Housing	<b>Councillor &amp; MP Enquiries</b>	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)

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) -
Housing & Public Protection	Head of Housing	<b>MAPP<sup>2</sup>/MARAC<sup>3</sup> and Safeguarding Referrals (children &amp; adults at risk)</b> - 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 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
Housing & Public Protection	Head of Housing	<b>Multi-disciplinary team referrals –</b> 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
Housing & Public Protection	Head of Housing	<b>Telephone recording – outgoing &amp; incoming calls to DBC Housing staff for quality and training purposes</b>	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

<sup>2</sup> Multi-Agency Public Protection Arrangements

<sup>3</sup> Multi- Agency Risk Assessment Conference



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

## TECHNICAL & ORGANISATIONAL SECURITY MEASURES

Directorate	Information Asset Owner	IT Systems	Security Measures
Corporate Services	Head of IT & Transformation	<a href="#">Idox/UNIFORM/ Academy and department computers and laptops/internet /intranet</a> –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
Growth & Community	Community Development Manager	<a href="#">Pentana</a> – maintenance & administration	BS ISO/IEC 27001:2013 compliant
Housing & Public Protection	Head of Housing	<a href="#">Idox/UNIFORM Academy/Pentana and computers and laptops/ Internet/intranet</a> - – input of data – the landlord & tenant function	Use of passwords
Housing & Public Protection	Head of Housing	<a href="#">Kent Home Choice/Locata</a>	Data Sharing Protocol operated by the KHC Partnership
Corporate Services	Head of IT & Transformation	<a href="#">Stay Connected email alerts (DBC website)</a>	Subscriber own password – unsubscribe at any time
Housing & Public Protection	Head of Housing	<a href="#">Disaster recovery</a>	See Business Continuity Plan

# 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.	1.Council department(s) 2. Courts/tribunals etc. 3.Housing Associations 4.Contractors 5.Ombudsmen 6.Kent Homechoice Partnership 7.Police 8.Social Services 9.KCC 10.Porchlight 11.YMCA 12.MP 13.Councillors 14.Independent Domestic Violence Advocate 15. Now Medical 16. Hub Agencies 17. Multi-disciplinary teams 18. DLUHC	N/A	NO	Pentana – Cloud based – retention only  Secure Waste Disposal - no processing  SDC bulk printing – no processing  Kent Homechoice Partnership (KHCP)  Kent & Medway ISA  Porchlight  Independent Reviews Ltd  H-CLIC  Next Steps	Pentana - BS ISO/IEC 27001:2013 compliant  Secure Waste Disposal – confidentiality clause in contract  SDC bulk printing SLA  KHCP - compliant  KMISA - compliant  Porchlight – compliant  Independent Reviews - compliant  H-CLIC – compliant  Next Steps - compliant	N/A	N/A	YES – High – Score 9

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

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. 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
Corporate Services	HR Manager	<a href="#">Job Profiles</a>	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
Corporate Services	HR Manager	<a href="#">Recruitment and Selection</a> – 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
Corporate Services	HR Manager	<a href="#">Recruitment and Selection</a> – 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
Corporate Services	HR Manager	<a href="#">Right to Work</a> – 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
Corporate Services	HR Manager	<a href="#">Induction</a> – 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

<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"

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

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
Corporate Services	HR Manager	<a href="#">Disclosure Scotland Checks</a>	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
Corporate Services	HR Manager	<a href="#">Personnel Files</a> – 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
Corporate Services	HR Manager	<a href="#">Job Evaluations</a> – records relating to 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
Corporate Services	HR Manager	<a href="#">Job Evaluations</a> – 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
Corporate Services	HR Manager	<a href="#">Pre-Employment Health Questionnaires</a>	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
Corporate Services	HR Manager	<a href="#">Occupational Health Management &amp; Referrals</a> – 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
Corporate Services	HR Manager	<a href="#">Employee Absence</a> - 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
Corporate Services	HR Manager	<a href="#">Employee Absence</a> – 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)

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
Corporate Services	HR Manager	<b>Disciplinary Records where there is a case to answer</b> – 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
Corporate Services	HR Manager	<b>Disciplinary Records where there is no case to answer</b> – 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
Corporate Services	HR Manager	<b>Employment Tribunal</b> – 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
Corporate Services	HR Manager	<b>Grievance Records</b> – 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
Corporate Services	HR Manager	<b>Performance Capability</b> - 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
Corporate Services	HR Manager	<b>Ill Health Capability</b> - 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
Corporate Services	HR Manager	<b>Ill Health Retirement</b> - 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)

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 <sup>2</sup>
Corporate Services	HR Manager	<a href="#">Risk Assessments</a> - 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
Corporate Services	HR Manager	<a href="#">Training</a> – 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
Corporate Services	HR Manager	<a href="#">Training</a> – Training Course Materials	N/A	Dynamic materials – supersedes previous version	Common Practice	Archive	No	N/A	No	N/A	Electronic – Council computer	N/A
Corporate Services	HR Manager	<a href="#">HR Policies and Procedures</a> – 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
Corporate Services	HR Manager	<a href="#">Corporate Training Plan</a>	N/A	Dynamic document – supersedes previous version	Common Practice	Archive	No	N/A	No	N/A	Electronic – Council computer/ intranet	N/A
Corporate Services	HR Manager	<a href="#">Employee Corporate Training Records</a> – 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
Corporate Services	HR Manager	<a href="#">Training</a> – 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
Corporate Services	HR Manager	<a href="#">Training</a> - 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
Corporate Services	HR Manager	<a href="#">Workforce Strategies</a> – 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
Corporate Services	HR Manager	<a href="#">Restructures</a> – 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)

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
Corporate 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
Corporate 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
Corporate 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
Corporate Services	HR Manager	Yoti and Post Office - our government-certified identity service providers (Right to Work in the UK checks)	N/A	Date of Termination + 6 years	Statutory	Secure disposal	Yes - name, email address, contact details	Performance of a contract/taking steps preparatory to such a contract	Yes – racial and ethnic origin	Legal obligation compliance	Electronic – Council computer/ HR and Payroll System	N/A

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

## TECHNICAL & ORGANISATIONAL SECURITY MEASURES

Directorate	Information Asset Owner	IT Systems	DPIA	Security Measures
Corporate Services	Head of IT & Transformation	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
Corporate 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
Corporate Services	Head of IT & Transformation	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
Corporate Services	HR Manager	Health Management	N/A	Data Processor Agreement
Corporate Services	HR Manager	UCheck – DBS checks	N/A	
Corporate Services	HR Manager with IT Services support	Disaster recovery	N/A	See Business Continuity Plan



# 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) 9. Yoti and Post Office	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  Service providers' contracts	Pentana - BS ISO/IEC 27001:2013 compliant  Secure Waste Secure disposal – confidentiality clause in contract  Mid Kent Services - compliant  K&MISA – compliant  Compliant	NO	Yes- automated personal data. knowingly and actively provided by the data subject	YES - High – 9

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

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
Corporate Services	Head of IT & Transformation	Voice recordings of calls(outgoing and incoming) - via the ACD (Automatic Call Distribution) system – primarily the Customer Contact Centre and Housing	N/A	3 months from date of recording unless exceptional circumstances require a longer retention	Common Practice	Full deletion of electronic records	<a href="#">See Call Recording PN</a>				Electronic only	No
Corporate Services	Head of IT & Transformation	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
Corporate Services	Head of IT & Transformation	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
Corporate Services	Head of IT & Transformation	CCTV – interview Rooms -	N/A	5 weeks from date of recording	Common Practice	Deletion	Yes - (identifiable natural persons only) – images, voice recording	Legitimate Interest – Article 6(1)(f) UK GDPR	Yes – as recorded or viewed e.g. disability	Legitimate Interest – Article 6(1)(f) UK GDPR	Electronic	N/A
Corporate Services	Head of IT & Transformation	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

<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”

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

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
Corporate Services	Head of IT & Transformation	<b>IT procurement</b> – 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
Corporate Services	Head of IT & Transformation	<b>IT Contracts</b>	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
Corporate Services	Head of IT & Transformation	<b>IT Service plans, strategies, performance and management records</b>	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
Corporate Services	Head of IT & Transformation	<b>Performance Indicators</b>	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
Corporate Services	Head of IT & Transformation	<b>System backups</b>	Applicable if policy or strategies have privacy implications	Daily backups – retained for 35 days  Monthly backups – retained for 3 months	Common Practice	Deletion	Yes	As detailed in service specific IARs	Yes	As detailed in service specific IARs	Electronic	No
Corporate Services	Head of IT & Transformation	<b>Website – analytics data, traffic data</b>	N/A	Analytics - 14 months Traffic data – 12 months	Common Practice	Deletion	No	No	No	N/A	Electronic	No
Corporate Services	Head of IT & Transformation	<b>Emails – Officers and Members</b>	N/A	Officer emails - 18 months Member emails – 18 months from ceasing to be a Councillor - Permanent deletion with no recovery	Common Practice	Deletion	Yes	As detailed in service specific IARs	Yes	As detailed in service specific IARs	Electronic	No

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

## (IT) INFORMATION TECHNOLOGY SYSTEMS – DATA PROCESSOR AND RISKS

Directorate	Information Asset Owner	Administration/ maintenance	UK 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)
Corporate Services	Head of IT & Transformation	<p><b>Pentana</b> - Cloud based – retention only</p> <p><b>Idocs/Internet/ Intranet and department computers and laptops/Mod Gov Systems listed on other IARs (as applicable)</b></p> <p><b>Capita Advances Income Management system</b></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
Corporate Services	Head of IT & Transformation	<b>Business recovery</b>	See Business Plan			
Growth & Community	Community Development Manager	<b>Pentana</b> – maintenance & administration	BS ISO/IEC 27001:2013 compliant			

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

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
Corporate Services	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
Corporate Services	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
Corporate Services	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& RECORD OF PROCESSING ACTIVITY (ROPA)

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
Corporate Services	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& RECORD OF PROCESSING ACTIVITY (ROPA)

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
Corporate Services	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
Corporate Services	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
Corporate Services	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)

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
Corporate Services	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
Corporate Services	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
Corporate Services	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
Corporate Services	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
Corporate Services	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
Corporate Services	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
Corporate Services	Audit Manager	<b>General correspondence – emails, letters, memos etc.</b>	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

Directorate	Information Asset Owner	IT Systems	DPIA	Security Measures
Corporate Services	Wolters Kluwer	Team Mate – Maintenance and administration		Password administration - UK GDPR compliant
Corporate Services	Audit Manager	Team Mate- Data input	Yes	Password administration
Growth & Community	Community Development Manager	Pentana – maintenance & administration		BS ISO/IEC 27001:2013 compliant
Corporate Services	Head of IT & Transformation	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
Corporate Services	Audi Manager	Pentana and computers and laptops/Internet/ intranet – testing of data for the purpose of auditing		Use of passwords
Corporate Services	Audit Manager	Business recovery		See Business Continuity Plan

# 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 4.External Auditor	N/A	No	Team Mate – Cloud based – retention only  Pentana - Cloud based – retention only  Secure Waste Disposal - no processing –  Partnership Agreement between DBC and SDC <sup>2</sup>	Compliant  Pentana - BS ISO/IEC 27001:2013 compliant  Secure Waste Disposal – confidentiality clause in contract  Compliant	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.

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

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
Corporate Services	Property Information Consultant	<a href="#">Procedure/guidance</a> 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
Corporate Services	Property Information Consultant	<a href="#">Local Land Charges Register</a> - 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
Corporate Services	Property Information Consultant	<a href="#">Requisitions for Searches and Enquiries</a>	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
Corporate Services	Property Information Consultant	<a href="#">Performance Indicators</a> – for that land charges function	N/A	3 years from date of entry on Pentana	Common Practice	Disposal	No	N/A	No	N/A	Electronically on Pentana	N/A
Corporate Services	Property Information Consultant	<a href="#">Correspondence (general)</a> – 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

<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"

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

## TECHNICAL & ORGANISATIONAL SECURITY MEASURES

Directorate	Information Asset Owner	IT Systems	Security Measures	
Corporate Services	Head of IT & Transformation	<b>Computer systems/laptops/Internet</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	
Growth & Community	Community Development Manager	<b>Pentana</b> – maintenance & administration	BS ISO/IEC 27001:2013 compliant	
Corporate Services	Property Information Consultant	<b>Pentana</b> – input of land charges data	Password administration	
Corporate Services	Property Information Consultant in consultation with IT Services support	<b>Disaster recovery</b>	See Business Continuity Plan	

## 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	

## LEADERSHIP TEAM (and MPAs) – 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
All Directors	<b>Directors' General Correspondence</b> – letters, 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
All Directors -	<b>Minutes of Leadership Team meetings</b>	N/A	1 year	Common Practice	Secure disposal	No	N/A	No	N/A	Electronic and paper copy	No
All Directors	<b>Minutes of Senior Managers/Directors meetings</b>	N/A	1 year	Common Practice	Secure disposal	No	N/A	No	N/A	Electronic	No
Relevant Director – to MPA for logging purposes	<b>Ukrainian Officer Working Group</b> – Minutes of meetings	N/A	2 years	Common Practice	Secure disposal	No	N/A	No	N/A	Electronic	No
Relevant Heads of Service - to MPAs for logging & monitoring purposes)	<b>MP's Enquiries</b> – 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 2018-2019	Electronic and paper copy	No
Relevant Director -to MPAs (for logging purposes)r	<b>Grants</b> – 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

## LEADERSHIP TEAM (and MPAs) – 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
Chief Officer & Director of Corporate Services and Monitoring Officer -to MPAs (for logging purposes)	<b>Hospitality Register</b> – 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
Chief Officer & Director of Corporate services	<b>Minutes of Corporate Wellbeing Group meetings</b>	N/A	1 year	Common Practice	Secure disposal	No	N/A	No	N/A	Electronic	No
Democratic Services Manager to MPAs (for administration purposes)	<b>Remembrance Sunday</b> – 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

## LEADERSHIP TEAM (and MPAs) – 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
Chief Officer & Director of Corporate Services	<b>Strategic Risk Register</b>	N/A	Supersedes previous version	Common Practice	Secure disposal	No	N/A	No	N/A	Electronic	No
Monitoring Officer -to MPAs (for logging entries electronically)	<b>Disclosable Pecuniary Interests' Register – Members' (borough &amp; parishes) declaration of interests</b>	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 -to MPAs (for logging entries electronically)	<b>Gifts and Hospitality Register (Councillors) – declarations – emails, letters etc.</b>	N/A	Permanent for all current members – destroy 18 months after ceasing to be a councillor/co-opted member	Common Practice	Secure Disposal	Yes	Legal obligation to promote high standards of conduct- Section 27 Localism Act 2011	No	N/A	Electronic	No
Monitoring Officer & MPAs (for logging entries electronically)	<b>Voluntary Interests' Register -Members' declaration of interests</b>	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	ditto	No	N/A	Electronic and paper copies	No
MPAs (for administrative support)	<b>Civic Ceremonies &amp; VIP visits – invitations. labels etc.(Council related matters e.g. hosting and event)</b>	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
MPAs (for administrative support)	<b>Events &amp; VIP visits – invitations. labels etc.(Council related matters e.g. hosting and event)</b>	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

## LEADERSHIP TEAM (and MPAs) – 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 Service Managers - to MPAs (for administrative support)	<b>Complaints</b> - Record of complaints received - - emails letters etc.	N/A	6 months	Common Practice	Secure disposal	Yes – (identifiable natural persons only) - contact details such as name, title, address, telephone number & email address etc.	N/A	No	N/A	Electronic	No
Relevant Director- to MPAs (for administrative support)	<b>Dartfordian Awards</b> – 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
Relevant Director – to MPAs (for administrative support)	<b>The conduct of Mayoral business by the incumbent Mayor - general</b> 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
Relevant Director and HoS or Manager – to MPAs ( for administrative support)	<b>Environmental Information (EIR) – Pentana</b> - emails, letters decisions	N/A	2 years from the log-in date	Common Practice	Secure Disposal	Yes - (identifiable natural persons only) - contact details such as name, title etc.	Legal obligation – Environment Information Regulations 2004	No	N/A	Electronic - Pentana	No



## LEADERSHIP TEAM (and MPAs) – 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 and HoS or Manager – to MPAs ( for administrative support)	Freedom of Information (FOI) – Pentana- emails, letters, decisions	N/A	2years from the log-in date	Common Practice	Secure Disposal	Yes - (identifiable natural persons only) - contact details such as name, title etc.	Legal obligation- Freedom of Information Act 2000	No	N/A	Electronic - Pentana	No

### TECHNICAL & ORGANISATIONAL SECURITY MEASURES

Directorate	Information Asset Owner	IT Systems	Security Measures	
Corporate Services	Head of IT & Transformation	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	
Leadership Team	Directors & Leadership Team PAs	Computer systems/Intranet/ Internet –input of data	Password administration	
Leadership Team	PA to Director of Housing & Public Protection	Pentana – input of MPs enquiries	Password administration	
Growth and Community	Community Development Manager	Pentana – maintenance & administration	BS ISO/IEC 27001:2013 compliant	

# LEADERSHIP TEAM (and MPAs) – 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.Ombudsmen (LGO and HO) 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

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

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
Corporate Services	Head of Legal Services	<a href="#">Procedure/guidance</a> 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
Corporate Services	Head of Legal Services	<a href="#">Property matters</a> – 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
Corporate Services	Head of Legal Services	<a href="#">Deeds</a> – 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
Corporate Services	Head of Legal Services	<a href="#">Contract files</a> - 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)

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
Corporate Services	Head of Legal Services	<a href="#">Court/Tribunals judgments/orders</a>	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
Corporate Services	Head of Legal Services	<a href="#">Orders</a> - 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
Corporate Services	Head of Legal Services	<a href="#">Correspondence (general)</a> – 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
Corporate Services	Head of Legal Services	<a href="#">Town &amp; Country Planning</a> - 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)

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
Corporate 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
Corporate 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  Or Incoming emails, responses and related correspondence filed in Outlook – 2 years	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 or Outlook  Anonymised - electronically on SAR Schedule on intranet	N/A
Corporate 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, responses and related correspondence filed in Legal Services FOI Outlook folder – 2 years	Common Practice	Secure disposal	Yes – name, address, contact details-	Legal obligation compliance – FOIA 2000	No	N/A	Paper copy &/or electronically in Pentana or Outlook	N/A
Corporate 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 2 years	Common Practice	Disposal	No	N/A	No	N/A	(Anonymised) Electronically in Pentana	N/A

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

Corporate 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
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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
Corporate 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
Corporate 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
All Directorates	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 - intranet	N/A

## TECHNICAL & ORGANISATIONAL SECURITY MEASURES

Directorate	Information Asset Owner	IT Systems	Security Measures
Corporate Services	Head of IT & Transformation	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
Growth & Community	Community Development Manager	Pentana - – maintenance and administration	BS ISO/IEC 27001:2013 compliant
Corporate 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
Corporate Services	Head of Legal Services	Disaster recovery	Dedicated IP address, up-to-date encryption protocols etc. 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.Ombudsmen 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

# MEMBER CODE OF CONDUCT COMPLAINTS & INTERESTS/GIFTS & HOSPITALITY REGISTERS (MONITORING OFFICER) - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

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
Corporate Services	Monitoring Officer	Arrangements for dealing with Code of Conduct Complaints under Localism Act 2011	N/A	Supersedes preceding version – archive for	Common Practice	Archive	No	N/A	No	N/A	Electronic and Internet/Intranet	No
Corporate Services	Monitoring Officer	Member Code of Conduct	N/A	Supersedes preceding version	Common Practice	Archive	No	N/A	No	N/A	Electronic and Internet/Intranet	No
Corporate Services	Monitoring Officer	Initial assessment – case file material	N/A	Permanent for all current members – destroy after ceasing to be a councillor/co-opted member but retain decisions (see below)	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
Corporate Services	Monitoring Officer	Informal resolution/mediation – case file material	N/A	Permanent for all current members – destroy after ceasing to be a councillor/co-opted member but retain decisions (see below)	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
Corporate Services	Monitoring Officer	Investigations- case file material	N/A	Permanent for all current members – destroy after ceasing to be a councillor/co-opted member but retain decisions (see below)	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
Corporate Services	Monitoring Officer	DPI referrals to Kent Police – case file material	N/A	Permanent for all current members – destroy after ceasing to be a councillor/co-opted member but retain decisions (see below)	Common Practice	Secure disposal	ditto	Legal obligation compliance - Localism Act 2011	Yes- alleged offence(s)	Legal compliance obligation – Localism Act 2011	Paper copy &/or electronically	No



# MEMBER CODE OF CONDUCT COMPLAINTS & INTERESTS/GIFTS & HOSPITALITY REGISTERS (MONITORING OFFICER) - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

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
Corporate Services	Monitoring Officer	<b>Decisions – Monitoring Officer/ Court/Ombudsman/ Hearing Panel/DPI Kent Police Referrals</b>	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 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
Corporate Services	Democratic Services Manager	<b>Hearing Panel</b> – report and investigation material etc. and minutes	N/A	Date reported + 6 years	Statutory (for minutes & background information)	Secure disposal of paper records  Archive electronically (minutes & background information )	Yes	Legal obligation - Localism Act 2011 (ethical standards provisions)	No	N/A	Electronically on Mod Gov	N/A
Corporate Services	Democratic Services Manager	<b>Anonymised statistical information</b> 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
Corporate Services	Democratic Services Manager	<b>Collection of anonymised data of complainants' diversity information</b> - 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
Corporate Services	Monitoring Officer	<b>Disclosable Pecuniary Interests' Register</b> – 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 & INTERESTS/GIFTS & HOSPITALITY REGISTERS (MONITORING OFFICER) - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

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
Corporate Services	Monitoring Officer	<b>Gifts and Hospitality Register (Councillors)</b> – declarations – emails, letters etc.	N/A	Permanent for all current members – destroy 18 months after ceasing to be a councillor/co-opted member	Common Practice	Secure disposal	Yes -	Legal obligation to promote high standards of conduct- Section 27 Localism Act 2011	No	N/A	Electronic	N/A
Corporate Services	Monitoring Officer	<b>Voluntary Interests' Register -Members' declaration of interests</b>	N/A	Permanent for all current members – destroy 18 months after ceasing to be a councillor/co-opted member	Common Practice	Secure disposal	Yes	ditto	No	N/A	Electronic	N/A
Corporate Services	Monitoring Officer	<b>General correspondence between MO and members – emails, letters etc.</b>	N/A	Permanent for all current members – destroy after ceasing to be a councillor/co-opted member	Common Practice	Secure disposal	Yes	N/A	N/A generally	N/A	Electronic	N/A

## TECHNICAL & ORGANISATIONAL SECURITY MEASURES

Directorate	Information Asset Owner	IT Systems	Security Measures	
Corporate Services	Head of IT & Transformation	<b>Computer systems/Intranet/ Internet</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	
All Directorates	Heads of Service	<b>Computer systems/Intranet/ Internet</b> –input of data	Password administration	
Growth & Community	Community Development Manager	<b>Pentana</b> – maintenance & administration	BS ISO/IEC 27001:2013 compliant	

# MEMBER CODE OF CONDUCT COMPLAINTS & INTERESTS/GIFTS & HOSPITALITY REGISTERS (MONITORING OFFICER) - 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 UK 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 councillors, complainants etc.	1.Independent Person 2.Kent Police (where applicable) 3.Investigator (where applicable) 4.Courts/tribunals 5.Audit Board 6.Ombudsman (where applicable)	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)

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
Housing and Public Protection	Head of Waste, Public Realm & Enforcement Services	<b>Procedure/guidance</b> - on a range of matters		Supersedes previous version	Common Practice	Superseded	No	N/A	No	N/A	Electronic	N/A
Housing and Public Protection	Head of Waste, Public Realm & Enforcement Services	<b>Allotments</b> - 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
Housing and Public Protection	Head of Waste, Public Realm & Enforcement Services	<b>Grounds Maintenance successful tender</b> - 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
Housing and Public Protection	Head of Waste, Public Realm & Enforcement Services	<b>Grounds Maintenance contract management</b> – 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

<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

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

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
Housing and Public Protection	Head of Waste, Public Realm & Enforcement Services	<b>Playgrounds - successful tender</b> - 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
Housing and Public Protection	Head of Waste, Public Realm & Enforcement Services	<b>Friends of Groups (chaired by Councillors)</b> - 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
Housing and Public Protection	Head of Waste, Public Realm & Enforcement Services	<b>Football Pitches</b> - 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
Housing and Public Protection	Head of Waste, Public Realm & Enforcement Services	<b>Security successful tender</b> - 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
Housing and Public Protection	Head of Waste, Public Realm & Enforcement Services	<b>Graffiti - successful tender</b> - 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)

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
Housing and Public Protection	Head of Waste, Public Realm & Enforcement Services	<b>Public Conveniences - successful tender</b> - 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
Housing and Public Protection	Head of Waste, Public Realm & Enforcement Services	<b>Trees' Maintenance</b> – 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 Section 23 Local Government (Miscellaneous Provisions) Act 1976	No	N/A	Electronic	N/A
Housing and Public Protection	Head of Waste, Public Realm & Enforcement Services	<b>Bedding Plants - successful tender</b> - 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
Housing and Public Protection	Head of Waste, Public Realm & Enforcement Services	<b>Hanging Baskets - successful tender</b> - 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)

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
Housing and Public Protection	Head of Waste, Public Realm & Enforcement Services	<b>Café in the Park-successful tender</b> - 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
Housing and Public Protection	Head of Waste, Public Realm & Enforcement Services	<b>Complaints</b> – 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
Housing and Public Protection	Head of Waste, Public Realm & Enforcement Services	<b>Performance Indicators</b> - 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
Housing and Public Protection	Head of Waste, Public Realm & Enforcement Services	<b>Correspondence - (general)</b> – 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
Housing and Public Protection	Head of Waste, Public Realm & Enforcement Services	<b>Routine Service Requests</b> – 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)

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)
Housing and Public Protection	Head of Waste, Public Realm & Enforcement Services	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

Directorate -	Information Asset Owner	IT Systems	Security Measures
Corporate Services	Head of IT & Transformation	<a href="#">Idox/UNIFORM/Academy and department computers and laptops/Internet/Intranet</a> – 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
Growth & Community	Community Development Manager	<a href="#">Pentana</a> – maintenance & administration	BS ISO/IEC 27001:2013 compliant
Housing and Public Protection	Head of Waste, Public Realm & Enforcement Services	<a href="#">Idox/UNIFORM/Pentana and computers and laptops/Internet/Intranet</a> - – input of data – the parks and open spaces function	Use of passwords
Growth & Community	Customer Services Manager	<a href="#">On-line payments (hosted by Capita)</a>	PCIDSS compliant
Housing and Public Protection	Head of Waste, Public Realm & Enforcement Services	<a href="#">Disaster recovery</a>	See Business Continuity Plan

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

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
Growth and Community	Head of Planning Services	<b>Production of Planning Policy documents and topic evidence</b>	Applicable if policy or strategies have privacy implications	10 years after superseded by previous version	Common Practice	Disposal	No	N/A	No	N/A	Electronic	N/A
Growth and Community	Head of Planning Services	<b>Strategic Development Monitoring Data</b>	N/A	10 years after superseded by previous version	Common Practice	Secure Disposal	No	N/A	No	N/A	Electronic	N/A
Growth and Community	Head of Planning Services	<b>Forward Planning of sites, including Brownfield Land Register, 5 year housing land supply etc.</b>	N/A	10 years after superseded by 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
Growth and Community	Head of Planning Services	<b>Planning Strategy/Consultations -correspondence etc.</b>	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 Planning Policy Framework	No	N/A	Paper copy &/or electronically in Idox/Planning Portal	N/A
Growth and Community	Head of Planning Services	<b>Traffic Regulation Order Consultations – letters, emails, memos, spreadsheets etc.</b>	N/A	2 years from scheme installation date Or where informal consultation not progress, 2 years from the consultation close 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 electronically	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

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

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
Growth and Community	Head of Planning Services	<b>Planning application process</b> – case file material including reports, and decisions, applications, approvals, and consultations, background information, consultation responses, site photos, reports, S106s/Unilateral, 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
Growth and Community	Head of Planning Services	<b>Pre-application enquiries</b> – 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
Growth and Community	Head of Planning Services	<b>The process of planning enforcement</b> –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 SERVICES (INCLUDING FORWARD PLANNING & TROs) - INFORMATION ASSET REGISTER& RECORD OF PROCESSING ACTIVITY (ROPA)

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
Growth and Community	Head of Planning Services	<b>National Strategic Infrastructure Projects</b> – 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	Growth and Community
Growth and Community	Head of Planning Services	<b>Tree Preservation Orders</b> – 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
Growth and Community	Head of Planning Services	<b>Hedgerow Regulations</b> - 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
Growth and Community	Head of Planning Services	<b>Section 106 Agreements/Unilateral Undertakings</b> – 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/Public Access Paper copies retained as appropriate for larger developments, appeals and judicial review period	N/A
Growth and Community	Head of Planning Services	<b>CIL Process</b> – 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 unless related to on-going enforcement for payment	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 SERVICES (INCLUDING FORWARD PLANNING & TROs) - INFORMATION ASSET REGISTER& RECORD OF PROCESSING ACTIVITY (ROPA)

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
Growth and Community	Head of Planning Services	<b>CIL Funding</b> – personal information relating to the application for CIL funding	N/A	10 year from grant payment	Common practice	Secure disposal	Yes (identifiable natural persons only) - name, address, contact details	Public interest task - Community Infrastructure Levy Regulations 2010	No	No	Electronically	N/A
Growth and Community	Head of Planning Services	<b>High Hedges</b>	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 - Anti-social Behaviour Act 2003	Yes - offences	Substantial public interest - Anti-social Behaviour Act 2003	Electronic  Paper copies retained whilst proposal under consideration	N/A
Growth and Community	Head of Planning Services	<b>Hazardous Substances</b>	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	Yes-offences	Substantial public interest- Planning (Hazardous Substances ) Act 1990 and 2015 Regulations	Electronic  Paper copies retained whilst proposal under consideration	N/A
Growth and Community	Head of Planning Services	<b>Local Government &amp; Social Care Ombudsman</b> – 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 or where the complaint relates to a planning application/enforcement matter in which case retention will be permanent	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

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

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
Growth and Community	Head of Planning Services	<b>Performance Indicators</b>	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
Growth and Community	Head of Planning Services	<b>Leader's Advisory Group</b> - Notes and materials	N/A	3 years	Common Practice	Secure Disposal	N/A	N/A	No	N/A	Electronically	N/A
Growth and Community	Head of Planning Services	<b>General correspondence</b> – 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

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

## TECHNICAL & ORGANISATIONAL SECURITY MEASURES

Directorate	Information Asset Owner	IT Systems	Security Measures	
Corporate Services	Head of IT & Transformation	<a href="#">Idox/UNIFORM/Planning Portal/Academy/Internet/Intranet and department computers and laptops</a> – 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	
Growth & Community	Community Development Manager	<a href="#">Pentana</a> – maintenance & administration	BS ISO/IEC 27001:2013 compliant	
Growth & Community	Head of Planning Services	<a href="#">Idox/UNIFORM/Planning Portal/Academy/Pentana/Internet/Intranet and computers and laptops</a> – input of data – the planning process function	Use of passwords	
Growth and Community	Head of Planning Services	<a href="#">DBC website – property history</a>	Accessible to the public	
Corporate Services	Head of IT & Transformation	<a href="#">Stay Connected (DBC website)</a> – maintenance & administration	Customer password input and unsubscribe	
Growth & Community	Customer Services Manager	<a href="#">On-line payments (hosted by Capita)</a>	PCIDSS compliant	
Corporate Services	Head of IT & Transformation	<a href="#">Stay Connected email alerts (DBC website)</a>	Subscriber own password – unsubscribe at any time	
Growth & Community	Head of Planning Services	<a href="#">Disaster recovery</a>	See Business Continuity Plan	



# PLANNING SERVICES (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 UK 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  Key Marketing Services Limited trading as KPM Group	Pentana - BS ISO/IEC 27001:2013 compliant  Secure Waste Disposal – confidentiality clause in contract  SDC bulk printing SLA – confidentiality clause  SNAP – compliant  DSA compliant	N/A	N/A	Unlikely & moderate (2)  Unlikely & moderate (2)  Unlikely & minor (1)  Unlikely and moderate (2)  Unlikely and moderate (2)

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

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
Housing & Public Protection	Head of Housing	<b>Policies/strategies</b> 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
Housing & Public Protection	Head of Housing	<b>Fees for HMO/Caravan Sites' Licensing</b> – schedule of fees	N/A	Supersedes previous version	Common Practice	Disposal	No	N/A	No	N/A	Electronic	No
Housing & Public Protection	Head of Housing	<b>Single household disrepair case management and harassment &amp; illegal eviction cases</b> - 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
Housing & Public Protection	Head of Housing	<b>Houses in Multiple Occupation – checking standards/hazards under the Housing Act 2004 including HMO Management Regulations</b> - 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 re-visit 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 &/o electronic	N/A – but see safeguarding

<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

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

Directorate	Information Asset Owner	Record/Information Description	DPIA <sup>2</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
Housing & Public Protection	Head of Housing	<b>Houses in Multiple Occupation Licences</b> – 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
Housing & Public Protection	Head of Housing	<b>Caravan Site Licences</b> – 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
Housing & Public Protection	Head of Housing	<b>Empty properties</b> - 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

<sup>2</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

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

Directorate	Information Asset Owner	Record/Information Description	DPIA <sup>3</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
Housing & Public Protection	Head of Housing	<b>Enforcement Action – formal actions –</b> 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
Housing & Public Protection	Head of Housing	<b>Disabled Facilities Grants-</b> 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

<sup>3</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

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

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
Housing & Public Protection	Head of Housing	<b>Discretionary Assistance</b> – 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)

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
Housing & Public Protection	Head of Housing	<b>Housing condition reports for Immigration Inspections</b> – 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
Housing & Public Protection	Head of Housing	<b>Emergency works - unsafe conditions in residential accommodation</b> – 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
Housing & Public Protection	Head of Housing	<b>Adaptations, small handyperson jobs and information for older or disabled people</b> -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
Housing & Public Protection	Head of Housing	<b>Works in default of enforcement action –case file material- correspondence, notices etc.</b>	N/A	3 years from date of file closure (may need to be kept beyond the retention e.g. for evidential purposes)	Common Practice	<b>Secure Disposal</b>	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)

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
Housing & Public Protection	Head of Housing	<b>Kent &amp; Medway Fire &amp; Rescue Authority</b> – 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
Housing & Public Protection	Head of Housing	<b>Correspondence (general- not specific case related)</b> – 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
Housing & Public Protection	Head of Housing	<b>Performance Indicators</b> - 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
Housing & Public Protection	Head of Housing	<b>Rogue landlords &amp; letting agents</b> – 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
Housing & Public Protection	Head of Housing	<b>Councillor &amp; MP Enquiries</b>	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

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

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
Housing & Public Protection	Head of Housing	<b>Housing Ombudsman &amp; Local Government &amp; Social Care Ombudsman</b> - 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
Housing & Public Protection	Head of Housing	<b>Complaints</b> – 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
Housing & Public Protection	Head of Housing	<b>Multi-disciplinary team referrals</b> – 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
Housing & Public Protection	Head of Housing	<b>Telephone recording</b> – 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 & Public Protection	Head of Housing	<b>Housing Stock Modelling and Integrated Database Project</b> – 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)

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) -
Housing & Public Protection	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 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

Directorate	Information Asset Owner	IT Systems	Security Measures	
Corporate Services	Head of IT & Transformation	<a href="#">Idox/UNIFORM and department computers and laptops, internet/intranet</a> – 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	
Housing & Public Protection	Head of Housing	<a href="#">Idox/UNIFORM and computers and laptops/Internet/ Intranet</a> - – input of data – PSH functions	Use of passwords	
Growth & Community	Customer Services Manager	<a href="#">On-line payments (hosted by Capita)</a>	PCIDSS compliant	
Growth & Community	Community Development Manager	Pentana – maintenance & administration	BS ISO/IEC 27001:2013 compliant	
Housing & Public Protection	Head of Housing	<a href="#">Disability Facilities Grant</a> – financial assessment using FERRET program	User password	
Corporate Services	Head of IT & Transformation	<a href="#">Stay Connected email alerts (DBC website)</a>	Subscriber own password – unsubscribe at any time	
Housing & Public Protection	Head of Housing	<a href="#">Disaster recovery</a>	See Business Continuity Plan	
Housing & Public Protection	Head of Housing	<a href="#">Housing Stock Modelling and Integrated Database project - BRE</a>	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.Town & Country 7.Kent & Medway Fire & Rescue Authority 8.KCC 9.NHS 10.Social Services 11.Mortgage providers 12DFG agents 15.Darent Valley Hospital	N/A	N/A	Kent and Medway Information Sharing Agreement (KMISA)  Kent & Medway Fire & Rescue Authority Fire Safety Protocol  Contracts for Works in default/emergency remedial action	Pentana - BS ISO/IEC 27001:2013 compliant  Secure Waste Disposal – confidentiality clause in contract  KMISA - compliant  KFRS –Interim protocol - Sept 2021  Works in default etc. – No contractor procured	N/A	N/A	YES –HIGH – risk score 9

RETURNING OFFICER	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/addresses	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 1UR	ELECTORAL PROCESS													
<b>ELECTORAL REGISTER</b>														
Returning Officer (Local Returning Officer)(Acting Returning Officer) Police Area Returning Officer	Electoral Services Manager	Nomination Register and Alterations	12 months from close of poll	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
Returning Officer (Local Returning Officer)(Acting Returning Officer) Police Area Returning Officer	Electoral Services Manager	Polling Station Register	12 months from close of poll	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	PDF	Returning Officer Staff	N/A	N/A
<b>ELECTIONS</b>														
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	Archived	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 - Legal obligation.	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	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	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	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	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	ECQ/Centre Circle	N/A	N/A
		Employment Information	Until ceases to work for the Returning Officer	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
		Temporary Elector ID Certificate	12 months after the poll	Common Practice	Secure disposal	Yes, name	Election Act 2022	No	N/A	No	Manually/Electronic	Returning Officer Staff	DLHUC	Memorandum of Understanding (MoU) Data Sharing Agreement (DSA)
<b>ABSENT VOTING</b>														
Returning Officer (Local Returning Officer)(Acting Returning Officer) Police Area Returning Officer	Electoral Services Manager	Election Postal Data	12 months from close of poll	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 & AvertGuard)	IT	N/A	N/A

[illegible]

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

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 <sup>2</sup>	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
Corporate Services	Corporate Complaints Officer	<a href="#">Procedure/guidance</a> 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
Corporate Services	Corporate Complaints Officer	<a href="#">Stage One</a> – 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
Corporate Services	Corporate Complaints Officer	<a href="#">Stage Two</a> - 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

<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

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

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
Corporate 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
Corporate 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
Corporate 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
Corporate Services	Corporate Complaints Officer  Democratic 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 Go & Pentane	N/A
Corporate Services	Corporate Complaints Officer  Democratic 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 Go & Pentane	N/A

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

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
Corporate 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 Go & Pentane	N/A
Corporate Services	Corporate Complaints Officer Democratic 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 Go & Pentane	N/A
Corporate Services	Corporate Complaints Officer Democratic 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 Go & Pentane	N/A
Growth & Community	Customer Services Manager	CCTV (installed in the Civic Centre) and processing of images	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	



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

## TECHNICAL & ORGANISATIONAL SECURITY MEASURES

Directorate	Information Asset Owner	IT Systems	Security Measures	
Corporate Services	Head of IT & Transformation	Idol/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 organizational measures for ensuring the security of the processing, corporate guidance on organisational/security measure, DPIAs	
Corporate Services	Head of IT & Transformation	CRM - maintenance & administration		
Corporate Services	MPAs/ Democratic Services	Pentane – input of corporate complaints data	Password administration	
Growth & Community	Community Development Manager	Pentane – maintenance & administration	BS ISO/IEC 27001:2013 compliant	

## 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	Pentane – Cloud based – retention only  Secure Waste Disposal - no processing  SDC bulk printing – no processing	Pentane - 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)

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
Corporate Services	Address Management & GIS Officer	<a href="#">Procedure/guidance</a> 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
Corporate Services	Address Management & GIS Officer	<a href="#">Online Address Request Form</a> – 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
Corporate Services	Address Management & GIS Officer	<a href="#">SNN Paperwork</a> – 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

<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"

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

Directorate	Information Asset Owner	Record/Information Description	DPIA <sup>2</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
Corporate Services	Address Management & GIS Officer	<b>Correspondence (general)</b> – 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

Corporate Services	head of IT & Transformation	<b>Idox and computers and laptops</b> - – 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
Growth & Community	Community Development Manager	<b>Pentana</b> – maintenance & administration	BS ISO/IEC 27001:2013 compliant
Corporate Services	Address Management & GIS Officer	<b>Pentana</b> – input of street naming data PIs	Password administration
Corporate Services	Address Management & GIS Officer in consultation with IT Services support	<b>Disaster recovery</b>	See Business Continuity Plan

<sup>2</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”

# 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

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

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 Paper copy and/or on electronic systems (including mobile devices)	Children (under 13) – parental consent normally required
Housing & Public Protection	Head of Housing	<b>Policies/strategies</b> - 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
Housing & Public Protection	Head of Housing	<b>The process for applying for council housing</b> – 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
Housing & Public Protection	Head of Housing	<b>Anti-Social Behaviour</b> – 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

<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

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

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
Housing & Public Protection	Head of Housing	<b>The process for managing the tenancy of an individual</b> - 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
Housing & Public Protection	Head of Housing	<b>The process for managing the tenancy of an individual</b> – 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
Housing & Public Protection	Head of Housing	<b>Court Orders</b>	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

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

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
Housing & Public Protection	Head of Housing	<b>Rent arrears management</b> - 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
Housing & Public Protection	Head of Housing	<b>Procurement relating to estate services</b>	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
Housing & Public Protection	Head of Housing	<b>Resident meeting minutes</b>	N/A	1 year from date of meeting	Common practice	Secure disposal	No	N/A	No	N/A	Paper copy & electronic	N/A
Housing & Public Protection	Head of Housing	<b>Issuing requests to contractors for individual properties</b> – 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

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

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
Housing & Public Protection	Head of Housing	<b>Performance Indicators</b> - 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
Housing & Public Protection	Head of Housing	<b>General Correspondence</b> – 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
Housing & Public Protection	Head of Housing	<b>Housing Ombudsman &amp; Local Government &amp; Social Care Ombudsman</b> 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
Housing & Public Protection	Head of Housing	<b>CSU Daily Tasking</b> - 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



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Housing & Public Protection	Head of Housing	<b>Councillor &amp; MP Enquiries</b>	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 & Public Protection	Head of Housing	<b>Complaints</b> – 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
Housing & Public Protection	Head of Housing	<b>Telephone recording – outgoing &amp; incoming calls to Housing staff for quality and training purposes</b>	No	3 months from date of recording  See <a href="#">Call Recording Privacy Notice</a>	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

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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) -
Housing & Public Protection	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

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

## TECHNICAL & ORGANISATIONAL SECURITY MEASURES

Directorate	Information Asset Owner	IT Systems	Security Measures
Corporate Services	Head of IT & Transformation	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
Housing & Public Protection	Head of Housing	Idox/UNIFORM Academy/Pentana and computers and laptops/internet/intranet – the housing management function	Use of passwords
Growth & Community	Community Development Manager	Pentana – maintenance & administration	BS ISO/IEC 27001:2013 compliant
Growth & Community	Customer Services Manager	On-line payments (hosted by Capita)	PCIDSS compliant
Corporate Services	Head of IT & Transformation	Stay Connected email alerts (DBC website)	Subscriber own password – unsubscribe at any time
Corporate Services	Head of Housing	Disaster recovery	See Business Continuity Plan

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## 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

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

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
Housing & Public Protection	Head of Waste, Public Realm & Enforcement Services	<b>Procedures and guidance</b> -on a range of service matters	N/A	Supersedes preceding version	Common Practice	Superseded	No	N/A	No	N/A	Electronic	N/A
Housing & Public Protection	Head of Waste, Public Realm & Enforcement Services	<b>Refuse Collection and Street Cleansing – successful tender</b> - 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
Housing & Public Protection	Head of Waste, Public Realm & Enforcement Services	<b>Refuse Collection and Street Cleansing - contract management</b> – 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
Housing & Public Protection	Head of Waste, Public Realm & Enforcement Services	<b>Refuse Collection and Street Cleansing transfer notes and related documents</b>	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

<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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Housing & Public Protection	Head of Waste, Public Realm & Enforcement Services	<b>Waste Collection data</b> – 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
Housing & Public Protection	Head of Waste, Public Realm & Enforcement Services	<b>Routine Service Requests</b> – 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
Housing & Public Protection	Head of Waste, Public Realm & Enforcement Services	<b>Complaints</b> – 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
Housing & Public Protection	Head of Waste, Public Realm & Enforcement Services	<b>Local Government &amp; Social Care Ombudsman</b> – 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
Housing & Public Protection	Head of Waste, Public Realm & Enforcement Services	<b>Abandoned Vehicles</b> – 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