

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

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personal data when we no longer need it will reduce the risk that it becomes irrelevant, excessive, inaccurate or out of date.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) (‘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.

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 data² and non-personal data³. 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.

²Any 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

³Data 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 coordinated 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, 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

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
- Information Governance Strategy

ANNEX – INFORMATION ASSET REGISTERS & RECORDS OF PROCESSING ACTIVITY (ROPA)

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

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIA ¹	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal/archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held manually and/or on electronic systems (including mobile devices)	Children (under 13) – parental consent normally required
Internal Services	Head of Waste, Public Realm and Enforcement	Procedure/guidance on a range of matters	N/A	Supersedes previous version	Common Practice	Superseded	No	N/A	No	N/A	Electronic	N/A
Internal Services	Head of Waste, Public Realm and Enforcement	Cemeteries Rules & Regulations	N/A	Permanent	Common Practice	Archive	No	N/A	No	N/A	Electronic	N/A
Internal Services	Head of Waste, Public Realm and Enforcement	Burial Registration – bookings, interment details, correspondence etc.	N/A	Permanent	Statutory	Archive	Yes - (identifiable natural persons only) – name, address, contact details	Public interest task pursuant to: Local Authorities' Cemeteries Order 1977 (as amended)	No	N/A	Paper copy & electronically in BACAS	N/A
Internal Services	Head of Waste, Public Realm and Enforcement	Grave Register – grave data/ownership details, deceased information	N/A	Permanent	Statutory	Archive	Yes - (identifiable natural persons only) – name, address, contact details	Legal obligation compliance pursuant to: Local Authorities' Cemeteries Order 1977 (as amended)	No	N/A	Electronic	N/A
Internal Services	Head of Waste, Public Realm and Enforcement	Burial Register - 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

¹ 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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BEREAVEMENT SERVICES – INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIA	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal/archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held manually and/or on electronic systems (including mobile devices)	Children (under 13) - parental consent normally required
Internal Services	Head of Waste, Public Realm and Enforcement	Exhumations – disinterment' correspondence etc.	N/A	Permanent	Statutory	Archive	Yes - (identifiable natural persons only) – name, address, contact details	Public interest task: Legal obligation compliance pursuant to: Burial Act 1857	No	N/A	Paper copy & electronic - BACAS	N/A
Internal Services	Head of Waste, Public Realm and Enforcement	Memorial Management – correspondence etc.	N/A	Permanent	Common Practice	Archive	Yes - (identifiable natural persons only) – name, address, contact details	Contract: Public interest task pursuant to: Local Authorities' Cemeteries Order 1977 (as amended)	No	N/A	Paper copy & electronic - BACAS	N/A
Internal Services	Head of Waste, Public Realm and Enforcement	Cemetery Plans	N/A	Permanent	Common Practice	Archive	No	N/A	No	N/A	Paper copy	N/A
Internal Services	Head of Waste, Public Realm and Enforcement	Closed Churchyards – records - St Marys, St Margaret's, Holy Trinity, St Edmunds Pleasance	N/A	Permanent	Statutory	Archive	No	N/A)	No	N/A	Paper copy	N/A
Internal Services	Head of Waste, Public Realm and Enforcement	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)

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIA	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal/archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held manually and/or on electronic systems (including mobile devices)	Children (under 13) - parental consent normally required
Internal Services	Head of Waste, Public Realm and Enforcement	Complaints -- case file management – correspondence etc.	N/A	2 years from date of case closure unless exceptional circumstances require longer retention e.g. pending court case	Common Practice	Secure Disposal	Yes - (identifiable natural persons only) – name, address, contact details	Public interest task pursuant to: Local Authorities' Cemeteries Order 1977 (as amended)	No	N/A	Paper copy &/or electronic - Idocs	N/A
Internal Services	Head of Waste, Public Realm and Enforcement	Correspondence (general) – emails, letters, memos etc.	N/A	1 year unless considered important for future reference	Common Practice	Secure Disposal	Yes - (identifiable natural persons only) – name, address, contact details	Public interest task) pursuant to: Local Authorities' Cemeteries Order 1977 (as amended)	No	N/A	Paper copy &/or electronic - Idocs	N/A
Internal Services	Head of Waste, Public Realm and Enforcement	Performance Indicators - statistical information (anonymised)	N/A	If a performance indicator is no longer required, deactivate and archive the indicator and delete from Pentana after 1 year	Common Practice	Disposal	No	N/A	No	N/A	Electronic - Pentana	N/A

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

TECHNICAL & ORGANISATIONAL SECURITY MEASURES

Strategic Directorate	Information Asset Owner	IT Systems	Security Measures
Internal Services	Head of IT	Idocs/UNIFORM/Academy 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
Internal Services	Policy & Corporate Support Manager ????	Pentana – maintenance & administration	BS ISO/IEC 27001:2013 compliant
Internal Services	Head of Waste, Public Realm and Enforcement	BACAS/Idocs/UNIFORM Academy/Pentana and computers and laptops/Internet/Intranet - – input of data – the landlord & tenant function	Use of passwords
Internal Services	Customer Services Manager	On-line payments (hosted by Capita)	PCIDSS compliant
External Services	Head of Waste, Public Realm and Enforcement	Disaster recovery	See Business Continuity Plan
Internal Services	Head of Waste, Public Realm and Enforcement	CCTV	A key part of the Council's security measures

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 ¹	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	Procedure/guidance 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	Competent Persons Register	N/A	Permanent	Statutory	Archive	Yes - identifiable natural persons only) - name, address, contact details	Scheme approved by DLUHC	No	N/A	Electronic – Idox	No
Growth & Community	Building Control Manager	Initial Notices Register	N/A	Permanent	Statutory	Archive	Yes - identifiable natural persons only) - name, address, contact details	Public interest task pursuant to: Building Act 1984	No	N/A	Electronic – Idox	No
Growth & Community	Building Control Manager	Building Control application process – 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	Building works' inspection – 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

¹ 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, GDPR Data Retention and Disposal Policy & Schedule July 2024

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)

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	The process of building control enforcement –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, Building Safety Act 2022	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 electronically	No
Growth & Community	Building Control Manager	Structural Engineers details & calculations Architects drawings Specialist consultants (e.g. Mechanical engineering etc. Pre-existing underground services etc.	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 Building Safety Act 2022	No	N/A	Electronic	No
Growth & Community	Building Control Manager	Performance Indicators – 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	Building Safety Act 2022	No	N/A	Electronic - Pentana	N/A

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

Growth & Community	Building Control Manager	Fire Safety – 2005 Order consultation with Fire Brigade - case file material	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	N/A
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Growth & Community	Building Control Manager	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	Public interest task pursuant to: Building Act 1984 Building (Approved Inspectors Etc.) Regulations 2010 and Building Safety Act 2022 Building Regulations 2010	No	N/A	Electronic	No
Growth & Community	Building Control Manager	Dangerous Structures – 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	No
Growth & Community	Building Control Manager	Demolitions – counter notices - 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	No
Growth & Community	Building Control Manager	Microfiche case records - 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	Means of escape from fire – 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	No
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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	Computer systems/laptops/Internet/Intranet/UNIFORM/ldox – 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	On-line payments	PCIDSS compliant
Growth & Community	Community Services Manager	Pentana – maintenance & administration	BS ISO/IEC 27001:2013 compliant
Growth & Community	Building Control Manager	Pentana/UNIFORM/ldox/Internet/Intranet – input of data – the building control function	Password administration
Growth & Community	Building Control Manager	Disaster Recovery	In accordance with the Business Continuity Plan
Housing & Public Protection	Enforcement & Regulatory Services Manager	CCTV – maintenance and administration	A key part of the Council's security setup

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	Energy Efficiency – 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	BEIS LADS 1 External Wall Insulation and Air Source Heat Pump	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	Collective Switching – 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	LA Flexible Eligibility Programme - 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	Winter Warmth	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	Interreg 2 Seas Mers Zeeen - Triple – A - adoption of low-carbon technologies by home-owners 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	Home Energy Conservation Act biannual reports	N/A	5 years	Common Practice	Disposal	No	N/A	No	N/A	Paper copy/electronic	N/A
Housing & Public Protection	Climate Change Manager	Greenhouse Gas Emissions - reporting to Government	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	Display Energy Certificates and Energy performance certificates	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	Fuel Schemes - alleviating fuel poverty	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	<p>Safeguarding Referrals& adults at risk)</p> <p>Childrens lead on referral is Jade Ransley</p>	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	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 and computers and laptops/Internet/Intranet - – input of data – PSH functions	Use of passwords
Growth & Community	Customer Services Manager	On-line payments (hosted by Capita)	PCIDSS compliant
Growth & Community	Community Development Manager	Pentana – maintenance & administration	BS ISO/IEC 27001:2013 compliant
Housing & Public Protection	Head of Housing	Disability Facilities Grant – financial assessment using FERRET program	User password
Corporate Services	Head of IT & Transformation	Stay Connected email alerts (DBC website)	Subscriber own password – unsubscribe at any time
Growth & Community	head of Housing with IT Support	Disaster recovery	See Business Continuity Plan
Housing & Public Protection	Climate Change Manager	Collective Switching	Use of passwords
Housing & Public Protection	Change Manager	Warm Homes	Use of passwords
Housing & Public Protection	Change Manager	LA Flex	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.	<ol style="list-style-type: none"> 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	<p>Pentana – Cloud based – retention only</p> <p>Secure Waste Disposal - no processing -</p> <p>Kent & Medway Information Sharing Agreement</p> <p>Aran Services Limited (LA ECO Flexibility Eligibility Programme</p> <p>Town & Country (Handyperson Scheme)</p> <p>iChoosr (collective switching scheme)</p> <p>Kent & Medway Sustainable Energy Partnership – Kent Warm Homes Framework</p> <p>SGN First Time Gas Central Heating Agreement</p>	<p>Pentana - BS ISO/IEC 27001:2013 compliant</p> <p>Secure Waste Disposal – confidentiality clause in contract</p> <p>KMISA - compliant</p> <p>Aran Services Ltd - compliant</p> <p>Town & Country compliant</p> <p>iChoosr – compliant</p> <p>Kent Warm Homes Framework – compliant</p> <p>SGN - compliant</p>	N/A	N/A	YES –HIGH – risk score 9

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COMMUNITY 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	Community Services Manager	Peter Blake Gallery - application forms to exhibit in art gallery	N/A	6 months after art works are handed back	Common Practice	Secure disposal after 10 years	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	Owned by Artist	Peter Blake Gallery -Images/ artwork/ photography	N/A	2 weeks after close exhibition.	Common Practice	Secure disposal after 10 years	Yes (identifiable natural persons only) – name, address, contact details	Public interest task – Public Libraries & Museums Act 1964 (section 12 –art galleries)	No	N/A	Stored in a locked cupboard	No
Growth & Community	Community Services Manager	Corporate Plan – 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 Services Manager/ Policy and Performance Officer	Corporate Plan Performance Reporting - Details every quarter the councils performance against the Corporate Plan	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 Services Manager	Equality & Diversity Document Framework – 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 Services Manager	Customer Access Reviews – 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 Services Manager	Consultation & Engagement Strategy and Toolkit -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 Services Manager	Consultations & Surveys – forms representations etc.	N/A	On closure of consultation	Common Practice	Secure Disposal after 10 years	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 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 12) - parental consent normally required
Growth & Community	Community Services Manager	Performance Indicator - Data Quality Policy – sets out the corporate approach to data quality standards for performance indicator management	N/A	Supersedes previous version	Common Practice	Secure Disposal after 10years	No	N/A	No	N/A	Electronic and on website	No
Housing & Public Protection	Director of Housing & Public Protection	Safeguarding Policy – sets out the corporate approach to safeguarding children and adults at risk from abuse and neglect	Yes	Supersedes previous version	Common Practice	Secure Disposal after 10 years	No	N/A	No	N/A	Electronic and on website	No
Housing & Public Protection	Director of Housing & Public Protection	Modern Anti-Slavery & Human Trafficking Statement – 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	Secure Disposal after 10 years	No	N/A	No	N/A	Electronic and on website	No
Growth & Community	Community Services Manager	Social Media Policy – sets out the corporate approach to using social media	N/A	Supersedes previous version	Common Practice	Secure Disposal after 10years	No	N/A	No	N/A	Electronic	No
Growth & Community	Community Services Manager	Performance indicators – 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.	No	N/A	No	N/A	Electronically on Pentana	No

Growth & Community	Community Services Manager	Safeguarding Training Records – staff training records and certificates	N/A	3 years	Common Practice	Secure disposal after 3 years	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
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COMMUNITY 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	Community Services Manager	Dartford Youth Council - 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 Services Manager	Elders Forum - 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 Services Manager	Voluntary Sector Organisations - Contact details for organisations and charities	N/A	Permanent	Common Practice	Archive	Yes - personal contact details such as name, title, addresses, telephone numbers & personal email addresses	N/A	No	N/A	Electronic	No

Growth & Community	Community Services Manager	Events - 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
Growth & Community	Community Services Manager	Public events – lost children and vulnerable adults – 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
Growth & Community	Community Services Manager	Events – Purchase order and invoice records	N/A	2 years following the event	Common Practice	Deletion from database	No	N/A	No	N/A	Electronic and Hardcopy	No

COMMUNITY 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	Community Services Manager	Safeguarding Referrals (children & adults at risk) - emails & schedule of referrals – central log (anonymised)	N/A	Central Log - 2 years from date of entry Other data destroyed in accordance with the Safeguarding Privacy Notice	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)	Weight Management Programme - referrals & anonymised statistics and Community Services Data Set 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)	Health Walks - 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	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	No
Growth & Community	Community Services Manager	Health Partners and Partnership Projects - Organisational, performance and payment information	N/A	Permanent	Common Practice	Archive	Yes - personal contact details such as name, title, addresses, telephone numbers & personal email addresses	N/A	Yes	N/A	Electronic	No

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

Growth & Community	Communities & Business Team (SDC)	Postural Stability Classes - 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	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)	Manual-paper copies Data entered onto an excel spreadsheet that is password protected	No
Growth & Community	Communities & Business Team (SDC)	Exercise Classes - 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	Substantial Public interest (Articles 6(1)(d) and 9(2)(c) GDPR)	Manual-paper copies Data entered onto an excel spreadsheet that is password protected	No

COMMUNITY 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/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	Museum Curator	Accession records for Museum objects – 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	School Loan Service forms (Museum) - 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	Object Entry Forms for incoming loans or items left for identification (Museum)	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

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

Growth & Community	Community Services Manager	Dartford Big Day Out (annual) - 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 Services Manager	Projects, events & heritage – 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
Growth & Community	Community Services Manager	Assets of Community Value – 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 Services Manager	Public events – 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	Health Team Manager	Refernet - referrals	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	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

COMMUNITY SERVICES- 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 Big Day out) 2.Police (Dartford Big Day out) 3.NHS (Dartford Big Day out) (anonymised data) 4.KCC (safeguarding) 5. KCC Public Health 6.One You Kent – lifestyleservice	Yes	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 ReferKent-Refemet – data sharing agreement	DSA compliant	N/A	YES – High –Score 9

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.	Performance of a contract/taking steps preparatory to such a contract	No	N/A	Paper copy & electronic - Idox/UNIFORM	N/A

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	address, contact details 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	Leased renewals	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	Premises files - 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	Correspondence (general) – emails, letters, memos etc.	N/A	1 year unless considered important for future reference	Common Practice	Secure disposal	Yes (identifiable natural persons only) – name, address, contact details	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	Valuations - 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

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	Agenda and reports for meetings of the GAC, Cabinet, Committees Boards and Panels	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	Exempt reports to committees	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	Confidential reports to committees	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/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 ²
Corporate Services	Democratic Services Manager	Confirmed Minutes for meetings of the GAC, Cabinet, Committees Boards and Panels Draft Minutes	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	Register of Members' Interests	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	Members' questionnaires - 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	Correspondence (general) – 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	Petitions - 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 ³
Corporate Services	Democratic Services Manager	Performance Indicators	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	Partnerships, Agency & External Meetings – 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	Equalities monitoring questionnaires - complaints process	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

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

TECHNICAL & ORGANISATIONAL SECURITY MEASURES

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

DEMOCRATIC 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	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

ECONOMIC DEVELOPMENT & COMMUNICATIONS - 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	Economic Development & Communications Manager	Communications Plan – sets out the overall Comms strategy for the Borough	N/A	Supersedes previous version	Common Practice	Secure disposal after 10 years	No	N/A	No	N/A	Electronic copy	No
Growth & Community	Economic Development & Communications Manager	Social Media Policy – sets out the corporate approach to using social media	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	Economic Development & Communications Manager	Emergency Communications Warning & Informing Plan – how the Council will keep the public informed during an emergency	N/A	Supersedes previous version	Statutory	Secure disposal after 10 years	No	Legal obligation - Civil Contingencies Act 2004	No	N/A	Electronic and on website	No
Growth & Community	Economic Development & Communications Manager	Economic Development Strategy – sets out the overall ED strategy 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	Economic Development & Communications Manager	Grants e.g. UKSPF – development & administration of various grants	N/A	Supersedes previous versions	Common Practice	Secure disposal after 10 years	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	Electronic and on website	No
Growth & Community	Economic Development & Communications Manager	Town Centre Partnership - Conduit for town centre / place management & liaison with businesses & wider stakeholders	N/A	Supersedes previous version	Common Practice	7 years	Yes (identifiable natural persons only) – name, address, contact details	Public interest task –Localism Act 2011 – section1 -	No	N/A	Electronic and on website	No

ECONOMIC DEVELOPMENT & COMMUNICATIONS - 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	Economic Development & Communications Manager	Dartford Business Awards (annual) - database of entrants, administration forms etc.	N/A	On closure of consultation	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	Electronic & on website	No
Growth & Community	Economic Development & Communications Manager	Market Stalls & Street Trading Licensing – 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	Economic Development & Communications Manager	Photographs & digital images – photos, digital images , 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
Growth & Community	Economic Development & Communications Manager	Events & Engagement - applications for events engagement exercises	N/A	2 years following the event	Common Practice	Deletion from database	Yes - personal contact details such as name, title,	Public interest task – Local Government (Miscellaneous Provisions) Act 1976 - section 19	No	N/A	Electronic	No

							addresses, telephone numbers & personal email addresses	Local Government Act 2003 – section 93 & Legitimate Interests				
Growth & Community	Economic Development & Communications Manager	Capital Works – 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

ECONOMIC DEVELOPMENT & COMMUNICATIONS - 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	Procedure/guidance on a range of matters	N/A	Supersedes preceding version	Common Practice	Archive	No	N/A	No	N/A	Electronic	No
Growth & Community	Customer Services Manager	Telephone recording – 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	See Call Recording PN	No	N/A	Audio	No
Growth & Community	Customer Services Manager	CCTV (Reception Area) – 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	CRM - 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

ECONOMIC DEVELOPMENT & COMMUNICATIONS - 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	Customer satisfaction surveys	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	PV List Database - 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 Managing Customer Contact PN	Yes – alleged offences	Substantial public interest (prevention/ detection of crime)	Electronic	No
Growth & Community	Customer Services Manager	Residents' Parking Scheme Scratch Card Allocation – 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

ECONOMIC DEVELOPMENT & COMMUNICATIONS - 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	Access to Civic Centre Control System – 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	Completed Secure Payment Envelopes & Cheque Counterfoils, correspondence – 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	Performance Indicators – 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	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	Legal obligation under health & safety legislation Legitimate Interest Public Interest Task Consent	No	N/A	Paper copy/electronic	No

ECONOMIC DEVELOPMENT & COMMUNICATIONS - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

CONSENT, OUTSIDE EEA TRANSFERS, DATA PROCESSOR, MARKETING AND RISKS

TECHNICAL & ORGANISATIONAL SECURITY MEASURES

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

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
Elector process												
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 address (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 - 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

the People Regulations 2001

		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

Voter ID Certificates

		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 - 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
		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

ANNUAL CANVASS

in Officer		Canvass Communication (CCA / CCB / Canvass Forms)												
		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

		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
Canvassers														
		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														
in 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 -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
		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 -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
WARDS & BOUNDARIES														
in 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
in 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
in 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														

in 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,	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	Neighbourhood Planning 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)

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIA	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal/archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held Paper copy and/or on electronic systems (including mobile devices)	Children (under 13) – parental consent normally required
Housing & Public Protection	Head of Waste, Public Realm and Enforcement Services	Local Government & Social Care Ombudsman – 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	Head of Environmental Health and Regulatory Services	RIPA - authorisations database	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)

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIA	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal/archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held Paper copy and/or on electronic systems (including mobile devices)	Children (under 13) - parental consent normally required
Housing & Public Protection	Enforcement Manager	Litter Enforcement – 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
Housing & Public Protection	Enforcement Manager	Environmental Crime Enforcement - 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

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

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIA	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal/archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held Paper copy and/or on electronic systems (including mobile devices)	Children (under 13) – parental consent normally required
Housing & Public Protection	Head of Waste, Public Realm and Enforcement Services	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	Disposal	No	N/A	No	N/A	Electronic on Pentana	N/A
Housing & Public Protection	Head of Waste, Public Realm and Enforcement Services	Correspondence (general) – emails, letters, memos etc.	N/A	1 year unless considered important for future reference	Common Practice	Secure disposal	Yes - (identifiable natural persons only) - name, address, contact details	Public interest task –in accordance with the legislation referred to in this IAR (as applicable)	No	N/A	Paper copy &/or electronic	N/A

ENFORCEMENT & REGULATORY SERVICES - 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	Idox/UNIFORM and department computers and laptops/on-line/telephone payment 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, DPIAs, DPA contract provisions
Corporate Services	Policy and Performance Officer	Pentana – maintenance & administration	BS ISO/IEC 27001:2013 compliant
Housing & Public Protection	Head of Waste, Public Realm and Enforcement Services	Idox/UNIFORM/ Pentana and computers and laptops/Internet/ Intranet - – input of data – the enforcement & regulatory function	Use of passwords
Growth & Community	Customer Services Manager	On-line payments (hosted by Capita)	PCIDSS compliant
Housing & Public Protection	Head of Waste, Public Realm and Enforcement Services	Disaster recovery	See Business Continuity Plan

AUTOMATED DECISION MAKING

Strategic Directorate	Information Asset Owner	DPIA	Record/Information/ description	DPA requirements
n/a	n/a	n/a	n/a	n/a

ENFORCEMENT & REGULATORY SERVICES - 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	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	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 LA Support Ltd (Fixed Penalty Notices - littering& dog control Stanford & Green Ltd (Bailiffs) –parking contravention enforcement Newlyn PLC (Debt Recovery))	Pentana - BS ISO/IEC 27001:2013 compliant Secure Waste Disposal – confidentiality clause in contract K&MISA- - compliant Dartford CCTV Code of Practice - compliant LA Support Ltd - compliant Stanford & Green Ltd (Bailiffs) – compliant Newlyn PLC - compliant	N/A	N/A	Enforcement, Parking Services, Licensing & Community Safety – Medium – risk score - 4 Town Centre Management – Low - risk score - 2

				Park- Mobile UK Ltd (cashless parking)	Park-Mobile UK Ltd compliant			
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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	Comments
Housing & Public Protection	EH Team Manager - Commercial	Food Premises 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 /legal obligation -- Food Safety Act 1990	No	N/A	Electronic	N/A	Commercial Records FPREM need to be kept for 50 years.
Housing & Public Protection	EH Team Manager - Commercial	Food Registration Forms	N/A	50 years								N/A	Commercial Records
Housing & Public Protection	EH Team Manager - Commercial	Food Hygiene Inspections	N/A	7 years – manually delete from ldox as sits under the commercial record.								N/A	Commercial Records
Housing & Public Protection	EH Team Manager - Commercial	Low Risk Questionnaires	N/A	7 years – manually delete from ldox as sits under the commercial record.								N/A	Commercial Records
Housing & Public Protection	EH Team Manager - Commercial	Childminder Questionnaires	N/A	7 years – manually delete from ldox as sits under the commercial record.								N/A	Commercial Records
Housing & Public Protection	EH Team Manager - Commercial	Approved food premises inspections – notes, reports etc. -	N/A	7 years – manually delete from ldox as sits under the commercial record.	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	Commercial Records
Housing & Public Protection	Head of EH&RS	Service Requests – all, commercial, ancillary investigation enquiries	N/A	7 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	All
Housing & Public Protection	EH Team Manager - Commercial	Notifications from Public Health England - food poisoning food borne infections, infectious diseases, notifiable diseases etc.	N/A	Redact after 1 year. Destroy record after 7 years.	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) 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 Hygiene (England) Regulations 2013	Electronic	Yes – with parental consent	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	Comments
Housing & Public Protection	EH Team Manager - Commercial	Outbreak Notifications from UKHSA	N/A	7 years	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	N/A
Housing & Public Protection	EH Team Manager - Commercial	Food hygiene training – qualification- food business employees	N/A	7 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	Commercial Records
Housing & Public Protection	EH Team Manager - Commercial	RIDDOR – reporting of accidents & incidences in the work place & injuries, diseases and dangerous occurrences Dangerous occurrences involving asbestos	N/A	10 years for adults Under 18 – until the person is 21 40 years	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	LOLERS (Lifting Operations & Lifting Equipment Regulations 1998 - (defect notifications)	N/A	7years	Statutory	Secure Disposal	No	N/A	No	N/A	Electronic	N/A	Create new Uniform code.
Housing & Public Protection	EH Team Manager - Commercial	Cooling Towers' Register	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 Regulations 1992	No	N/A	Electronic- public record on request Health/Commercial Team/Health & Safety Enforcement Resources/Health & Safety Enforcement (Premises)/Cooling tower register DBC 2023 public register	N/A	Not logged on Uniform
Housing & Public Protection	EH Team Manager - Commercial	Childminders - 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	Commercial Records
Housing & Public Protection	EH Team Manager - Commercial	Health & Safety at Work -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	Commercial Records
Housing & Public Protection	EH Team Manager - Commercial	Skin piercing activities - registration applications (premises and persons), inspections' reports, letters, inspection proforma,	N/A	25 years	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 - Commercial	notices etc. Skin piercing enquiries	N/A	7 years	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	Statutory	
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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	Comments
Housing & Public Protection	EH Team Manager – Environmental Protection	Animal Licences - <ul style="list-style-type: none"> • Boarding Kennels • Catteries • Dangerous Wild Animals • Riding Establishments • Zoo 	N/A	7 years	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 Dangerous Wild Animals Act 1976 Zoo Licensing Act 1981	No	N/A	Electronic (uniform/s:)	N/A	
Housing & Public Protection	EH Team Manager – Environmental Protection	Stray Dog Register - data collected by DBC (electronic register) Paperwork Stray dog log kept by Davenden Kennels	N/A	7 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	On spreadsheet – not on Idox or Uniform.
Housing & Public Protection	EH Team Manager - Commercial	Primary Authority - 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	Legal Notices – 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	Legal Notices – charges on properties.	N/A	99 years or until the money has been paid back.	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	EH Team Manager – Environmental Protection	Audio Recordings – noise, disclosure forms etc.	N/A	7 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	No record of recordings kept on Idox.
Housing & Public Protection	Head of EH&RS	Local Government & Social Care Ombudsman – case file material - complaints received and outcomes	N/A	7 years	Common Practice	Secure Disposal	Yes - (identifiable natural persons only) - name , address, contact details	Public interest task/legal obligation – 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	
Housing & Public Protection	Head of EH&RS	Photographic Evidence of condition of	N/A	7 years	Common Practice	Secure Disposal	Yes- if linked with other data relating to an	Public interest task – in accordance	No	N/A	Electronic systems (s:)	N/A	With SR or commercial record.

		premises – case file – correspondence etc.						identifiable natural person	with the legislation referred to in this IAR (as applicable)					
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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	EH Team Manager – Environmental Protection	EARS Daily Tasking – 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	Events' Notifications- management of crowd safety at events such as festivals and concerts	N/A	7 years	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	
Housing & Public Protection	Head of EH&RS	General correspondence – 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	Food Registration – business premises	N/A	50 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	Paper files – migrating to electronic - public register on request	N/A	Commercial premises records
Housing & Public Protection	Head of EH&RS	Performance Indicators	N/A	7 years 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	PACE Note Books Officers Note Books - site visit inspections	N/A	7 years 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	

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	Idox/UNIFORM/Academy 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
Growth & Community	Community Development Manager	Pentana – maintenance & administration	BS ISO/IEC 27001:2013 compliant
Corporate Services	Customer Services Manager	On-line payments (hosted by Capita)	PCIDSS compliant
Corporate Services	Head of IT	Stay Connected email alerts (DBC website)	Subscriber own password – unsubscribe at any time
Housing & Public Protection	Head of EH&RS	Idox/UNIFORM Academy/Pentana and computers and laptops/internet /intranet - - input of data – the environmental health function	Use of passwords
Housing & Public Protection	EH Team Manager – Environmental Protection	ERG	Public access through secure website – password protected –ERG controlled
Housing & Public Protection	Head of EH&RS	Disaster recovery	See Business Continuity Plan
Housing & Public Protection	Head of EH&RS	CCTV – maintenance and administration	A key part of the Council's security setup

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.UKHS 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. Dept of BEIS 15. DEFRA	N/A	N/A	Pentana – Cloud based – retention only	Pentana - BS ISO/IEC 27001:2013 compliant – not managed by EH	N/A	N/A	Yes (corporate)
				Secure Waste Disposal - no processing –	Secure Waste Disposal – confidentiality clause in contract –not managed by EH	N/A	N/A	Yes (corporate)
				SDC/DBC Partnership Agreement	Partnership Agreement to be reviewed by legal	N/A	N/A	Yes(corporate)
				Kent & Medway Information Sharing Agreement	KMISA -compliant	N/A	N/A	Yes(corporate)
				????? Pest Control - pest inspection, exterminator, animal control		N/A	N/A	Yes -10
				Davenden Kennelling Contract	Davenden Kennelling – Compliant	N/A	N/A	Yes- 10
				Food Safety Inspections' Contracts	FSA –no contract required	N/A	N/A	Yes- 5
RIAMS and Noise App Contract	RIAMS and Noise App contract - compliant	N/A	N/A	Yes- 5				

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

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIAs ⁴	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
Budget												
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	4 years	Common Practice	Secure Disposal	No	N/A	No	N/A	Electronic	No
Corporate Services	Head of Finance	Budget Preparation	N/A	4 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

⁴ 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 & RECORD OF PROCESSING ACTIVITY (ROPA)

Strategic 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		Current year plus 1 year	Common Practice	Secure Disposal	No	N/A	No	N/A	Electronic	No

Strategic 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
		monitoring of the Capital Programme										
Final Accounts												

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

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 Member 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 & RECORD OF PROCESSING ACTIVITY (ROPA)

Strategic 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 & RECORD OF PROCESSING ACTIVITY (ROPA)

Strategic 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 & RECORD OF PROCESSING ACTIVITY (ROPA)

Strategic 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	N/A	Current year plus 6 years	HMRC - Compliance	Secure Disposal	No	N/A	No	N/A	Manual/Electronic	No

Strategic 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
		relating to the purchase of equipment			Handbook Manual CH15400							
Financial Records												

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

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
Financial Strategy												
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
Governance												
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
Grants												
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 & RECORD OF PROCESSING ACTIVITY (ROPA)

Strategic 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
Insurance												
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 polices 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 & RECORD OF PROCESSING ACTIVITY (ROPA)

Strategic 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
Insurance												
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
Monitoring												
Corporate Services	Head of Finance	Monthly Monitoring reports submitted to Cabinet -	N/A	Kept by Member 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
Payroll												
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 & RECORD OF PROCESSING ACTIVITY (ROPA)

Strategic 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

Strategic 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

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

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 & RECORD OF PROCESSING ACTIVITY (ROPA)

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIAs ⁵	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	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	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
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	No	N/A	Electronic	No

⁵ 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

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIAs ⁵	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
								Government Act 1972				
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

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

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
Treasury												
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
Misc.												
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 & RECORD OF PROCESSING ACTIVITY (ROPA)

TECHNICAL & ORGANISATIONAL SECURITY MEASURES

Strategic Directorate	Information Asset Owner	IT Systems	Security Measures
Corporate Services	I.C.T. Manager	Idox 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
Corporate Services	Policy & Corporate Support Manager	Ideagen – maintenance and administration	BS ISO/IEC 27001:2013 compliant
Corporate Services	Head of Finance	Idox/Pentana/Intranet/Internet and computers and laptops - - 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.
Corporate Services	Customer Services Manager	On-line payments (hosted by Capita)	PCIDSS compliant
Corporate Services	Customer Services Manager	AIMS – income management system – 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	ProContract	ISO 9001 registered with following controls: Access controls of Information Systems, backup of data – Corporate and Customer System availability processes, Change Control. Also internal and external vulnerability tests carried out using industry-leading software
Corporate Services	Head of Finance with IT Services support	eFinancials - 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	eProcurement - 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	Logotec	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, DPA contract provisions
Corporate Services	Head of Finance with IT Services support	Systems Link	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, DPA contract provisions

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

Strategic Directorate	Information Asset Owner	IT Systems	Security Measures
Corporate Services	Customer Services Manager with IT Services support	Disaster recovery	See Business Continuity Plan
External Services	Enforcement & Regulatory Services Manager	CCTV – maintenance and administration	A key part of the Council's security setup

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	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. Lendology 8. Analyse Local 9. Mid-Kent Shared services(Maidstone Borough Council) 10.Accesspay/Bacs	Analyse LOCAL – analysis of property & historical rating information to prepare estimate of business rate income for the forthcoming financial year Lendology Sedexo	N/A	N/A	Pentana – Cloud based – retention only Secure Waste disposal Analyse LOCAL – locator information Lendology Sedexo Mid-Kent (Payroll)	Pentana - BS ISO/IEC 27001:2013 compliant Secure Waste Disposal – confidentiality clause in contract LOCAL - Contract annex agreed Lendology contract includes provisions Sedexo – compliant HR lead on contract	N/A	N/A	Yes – MEDIUM

					Access pay	Access pay contract agreed			
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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 ¹	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	Procedure/guidance 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	Planned/responsive maintenance procurement – 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	Surveys - 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	Asbestos Register and Management Plans - 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	Fire Certificates - 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	Electrical installation Certificates – 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	Energy Management – 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	Equipment Testing – 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
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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	Repairs & maintenance of Council housing stock – 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	Waiting lists for sensitive planned works - 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	Planned/responsive maintenance repair - requests to 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	Gas Safety Checks' Certificates	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	Fire Risk Assessments	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 - Riskbase	N/A
Housing & Public Protection	Housing Maintenance Manager	Legionella Risk Assessments	N/A	Whole life of the installation + 6 years	Statutory	Archive	No	Public interest task pursuant to Health and Safety at	No	n/a	Electronic	N/A

								Work etc. Act 1974				
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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	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	Disposal	No	N/A	No	N/A	Electronic - Pentana	N/A
Housing & Public Protection	Housing Maintenance Manager	Correspondence (general) - 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	Disabled Adaptation recommendations	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	Safeguarding Referrals - 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	PV Register notifications	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 ⁱⁱ	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	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 - infreemation	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. (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	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 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/UNIF ORM 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	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	N/A	YES –High - Score - 9

				Clifford Devlin	Clifford Devlin Compliant		
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HOUSING POLICY DEVELOPMENT - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

Directorate	Information Asset Owner	Record/Information Description	DPIA ⁶	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	First Homes applications, Authority to Exchange and Compliance Certificates	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	Policy and guidance - on a range of housing matters	Applicable if policies or strategies have privacy implications	Supersedes previous versions	Common Practice	Archive	No	N/A	No	N/A	Electronic and paper copy	N/A

⁶ 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 ⁷	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	Appeals against banding assessment/access to housing register – 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 & Huume	N/A
Housing & Public Protection	Head of Housing	Request for a review of suitability of accommodation – 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
Housing & Public Protection	Head of Housing	Performance Indicators - 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

⁷ 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 & Public Protection	Head of Housing	Registration of individuals' housing applications – 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	Correspondence (general) – 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
Housing and Public Protection	Head of Housing	Tenant Satisfaction data (TSMs)	N/A	3 years (unless considered important for future reference)	Common Practice	Secure disposal	Yes (identifiable natural persons only) - name, address, contact details (if provided)	Public interest (subsidiary task)	No	N/A	Paper copy & or electronic	N/A
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 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 & 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

TECHNICAL & ORGANISATIONAL SECURITY MEASURES

Directorate	Information Asset Owner	IT Systems	Security Measures
Corporate Services	Head of IT & Transformation	Idox/One Housing 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
Growth & Community	Community Development Manager	Pentana – maintenance & administration	BS ISO/IEC 27001:2013 compliant
Housing & Public Protection	Head of Housing	Idox/UNIFORM One Housing/Pentana and computers and laptops/internet/intranet – the housing policy & development function	Use of passwords
Housing & Public Protection	Head of Housing	Huume - available Council properties advertised on Huume website (Kent Homechoice)	ISA - use of passwords by applicants - no access to data by other Kent authorities - authorised users only

Housing & Public Protection	Head of Housing	Disaster recovery	See Business Continuity Plan
Housing & Public Protection	Enforcement & Regulatory Services Manager	CCTV – maintenance and administration	A key part of the Council's security setup

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. The Leadership Factor (TLF) for processing Tenant Satisfaction data	N/A	N/A	Pentana – Cloud based – retention only Secure Waste Disposal - no processing - Kenthome Choice Partnership Protocol (for Huume) The Leadership Factor	Pentana - BS ISO/IEC 27001:2013 compliant Secure Waste Disposal – confidentiality clause in contract Kent HomeChoice Partnership Protocol – reviewed - compliant Compliant	N/A	YES – High – Score 9

HOUSING SCHEMES & FINANCE - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIA ⁸	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
External Services	Head of Housing	Policies/Strategies 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
External Services	Head of Housing	The process for applying for specialist accommodation in housing schemes. (successful & unsuccessful applications) - 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 Idocs	N/A
External Services	Head of Housing	The process for managing the tenancy of an individual - 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	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	External Services	N/A

⁸ 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 & FINANCE - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIA	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal/archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held manually and/or on electronic systems (including mobile devices)	Children (under 13) - parental consent normally required
External Services	Head of Housing	Garage rental applications - 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 Idocs	N/A
External Services	Head of Housing	Court Orders – 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 Idocs	N/A
Internal/External Services	Head of Housing	Procurement - 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
External Services	Head of Housing	Resident meetings - minutes	N/A	1 year from date of meeting	Common Practice	Secure Disposal	No	N/A	No	N/A	Paper copy & electronic	N/A
External Services	Head of Housing	Leasehold tenancies - – 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 – racial/ethnic origin, health data etc.	Substantial public interest pursuant to Housing Act 1985 Housing Act 1996	Paper copy &/or electronic in Idocs	N/A

HOUSING SCHEMES & FINANCE - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIA	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal/archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held manually and/or on electronic systems (including mobile devices)	Children (under 13) - parental consent normally required
External Services	Head of Housing	Age-specific Care & Welfare Referrals - 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	N/A
External Services	Head of Housing	Correspondence (general) – 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
External Services	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
External Services	Head of Housing	Right-to Buys - 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 Idocs	N/A

HOUSING SCHEMES & FINANCE - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIA	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal/archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held manually and/or on electronic systems (including mobile devices)	Children (under 13) - parental consent normally required
External Services	Head of Housing	Housing Ombudsman & Local Government & Social Care Ombudsman - 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 Idocs	N/A
External Services	Head of Housing	Dartford Private Leasing Scheme Lease Agreements – 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
External Services	Head of Housing	Community Centres Bookings – 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
External Services	Head of Housing	Performance Indicators –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 & FINANCE - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIA	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal/archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held manually and/or on electronic systems (including mobile devices)	Children (under 18) -
External Services	Head of Housing	MAPPA⁹/MARAC¹⁰ and Safeguarding Referrals (children & adults at risk) - 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 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
External Services	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 electronically in Idox	YES – with parental consent
External Services	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

⁹ Multi-Agency Public Protection Arrangements

¹⁰ Multi- Agency Risk Assessment Conference

HOUSING SCHEMES & FINANCE - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

TECHNICAL & ORGANISATIONAL SECURITY MEASURES

Strategic Directorate	Information Asset Owner	IT Systems	Security Measures
Internal Services	I.C.T. Manager	Idocs/UNIFORM/ Capita Housing 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.
Internal Services	Housing Systems Team Leader & I.C.T Manager	One Housing – maintenance and administration	Capita One Software as a service (SaaS) is hosted in Azure. Information Security Standard, Security standard for cloud services, Protection of personal data standards, CSA STAR cert cloud security, GDPR privacy, UK Cyber security threats, NCSC Cloud security principles, Network level attacks at firewalls, associated gateway infrastructure, internal network security including desktop, server & database security, active directory attacks, application level testing, targeted social engineering and malware attacks. Disaster recovery, automated backups of all databases,
Internal Services	Policy & Corporate Support Manager	Pentana – maintenance & administration	BS ISO/IEC 27001:2013 compliant
External Services	Head of Housing	Idocs/UNIFORM Capita Housing/ Pentana and computers and laptops /internet/intranet- – input of data – the housing schemes & finance function	Use of passwords
External Services	Head of Housing	Business & Disaster recovery	See Business Plan
External Services	Enforcement & Regulatory Services Manager	CCTV	A key part of the Council's security system

HOUSING SCHEMES & FINANCE - 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 YES/NO
Identifiable natural persons such as leaseholders, tenants, complainants, applicants, service users etc.	<ol style="list-style-type: none"> 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	<p>Pentana – Cloud based – retention only</p> <p>Secure Waste Disposal - no processing</p> <p>Review security of confidential sacks in offices</p> <p>SDC bulk printing – no processing</p> <p>Tunstall Healthcare Ltd (out of hours call centre)r</p> <p>Pinnacle PSG</p> <p>Kent & Medway Information Sharing Agreement</p>	<p>Pentana - BS ISO/IEC 27001:2013 compliant</p> <p>Secure Waste Disposal – confidentiality clause in contract</p> <p>SDC bulk printing SLA –includes confidentiality requirements</p> <p>Tunstall Healthcare Ltd</p> <p>Pinnacle PSG</p>	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 ¹¹	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	Procedure/guidance - 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	The process for applying for council housing (successful & unsuccessful applications) - 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	Downsize for Cash Scheme - 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

¹¹ 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	The process of awarding tenancies in council housing – 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	Homelessness – case file material including decisions Temporary Accommodation and relevant documentation Homeless Prevention activity 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	Dartford Private Sector Leasing Scheme - 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	Housing Ombudsman & Local Government & Social Care Ombudsman -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	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 electronically in Idox	YES – with parental consent
Housing & Public Protection	Head of Housing	Performance Indicators – 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	General Correspondence – 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	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 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	MAPPA¹²/MARAC¹³ and Safeguarding Referrals (children & adults at risk) - 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 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	Multi-disciplinary team referrals – 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	Telephone recording – 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

¹² Multi-Agency Public Protection Arrangements

¹³ Multi- Agency Risk Assessment Conference

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
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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	Idox/UNIFORM/ Academy 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
Growth & Community	Community Development Manager	Pentana – maintenance & administration	BS ISO/IEC 27001:2013 compliant
Housing & Public Protection	Head of Housing	Idox/UNIFORM Academy/Pentana and computers and laptops/ Internet/intranet - - input of data – the landlord & tenant function	Use of passwords
Housing & Public Protection	Head of Housing	Kent Home Choice/Huume	Data Sharing Protocol operated by the KHC Partnership and Huume
Corporate Services	Head of IT & Transformation	Stay Connected email alerts (DBC website)	Subscriber own password – unsubscribe at any time
Housing & Public Protection	Head of Housing	Disaster recovery	See Business Continuity Plan
Housing & Public Protection	Enforcement & Regulatory Services Manager	CCTV – maintenance and administration	A key part of the Council's security setup

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.	<ol style="list-style-type: none"> 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. 17. Hub Agencies 18. Multi-disciplinary teams 19. DLUHC 	N/A	NO	<p>Pentana – Cloud based – retention only</p> <p>Secure Waste Disposal - no processing</p> <p>SDC bulk printing – no processing</p> <p>Kent Homechoice Partnership (KHCP)</p> <p>Kent & Medway ISA</p> <p>Porchlight</p> <p>Independent Reviews Ltd</p> <p>H-CLIC</p> <p>Next Steps</p>	<p>Pentana - BS ISO/IEC 27001:2013 compliant</p> <p>Secure Waste Disposal – confidentiality clause in contract</p> <p>SDC bulk printing SLA</p> <p>KHCP - being reviewed</p> <p>KMISA - compliant</p> <p>Porchlight – to be reviewed</p> <p>Independent Reviews - to be reviewed</p> <p>H-CLIC – compliant</p> <p>Next Steps - compliant</p>	N/A	N/A	YES – High – Score 9

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

Directorate	Information Asset Owner	Record/Information Description	DPIA ¹⁴	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	Job Profiles	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	Recruitment and Selection – 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	Recruitment and Selection – 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	Right to Work – 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	Induction – 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

¹⁴ 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 - 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	Disclosure Scotland Checks	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	Personnel Files – 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	Job Evaluations – records relating to job evaluation of 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	Job Evaluations – 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	Pre-Employment Health Questionnaires	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	Occupational Health Management & Referrals – 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	Employee Absence - 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	Employee Absence – 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 - 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	Disciplinary Records where there is a case to answer – 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 contract/legal claims/legal proceedings	Electronic – Council computer/HR and Payroll System	N/A
Corporate Services	HR Manager	Disciplinary Records where there is no case to answer – 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	Employment Tribunal – 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	Grievance Records – 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	Performance Capability - 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	Ill Health Capability - 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	Ill Health Retirement - 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 - 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 ¹⁵
Corporate Services	HR Manager	Risk Assessments - 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	Training – 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	Training – 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	HR Policies and Procedures – 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	Corporate Training Plan	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	Employee Corporate Training Records – 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	Training – 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	Training - 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	Workforce Strategies – 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	Restructures – 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 - 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	18 months 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 - 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	Medigold Health	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 - 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.Medigold Health(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 - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

Directorate	Information Asset Owner	Record/Information Description	DPIA ¹⁶	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	See Call Recording PN				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 –	Applicable if policy or strategies have	Review 2 years after implementation	Common Practice	Deletion of electronic records, secure	No	N/A	No	N/A	Paper and/or electronic	No

¹⁶ 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”

		including policies/procedures	privacy implications			disposal of paper						
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INFORMATION TECHNOLOGY - 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	IT procurement – 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	IT Contracts	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	IT Service plans, strategies, performance and management records	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	Performance Indicators	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	System backups	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	Website – analytics data, traffic data	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	Emails – Officers and Members	N/A	Officer emails - 18 months Member emails – 18 months	Common Practice	Deletion	Yes	As detailed in service specific IARs	Yes	As detailed in service specific IARs	Electronic	No

				from ceasing to be a Councillor - Permanent deletion with no recovery									
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INFORMATION TECHNOLOGY - 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>Pentana - Cloud based – retention only</p> <p>Idocs/Internet/ Intranet and department computers and laptops/Mod Gov Systems listed on other IARs (as applicable)</p> <p>Capita Advances Income Management system</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	Business recovery	See Business Plan			
Growth & Community	Community Development Manager	Pentana – maintenance & administration	BS ISO/IEC 27001:2013 compliant			

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

Directorate	Information Asset Owner	Record/Information Description	DPIA ⁱ	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	Audit Working Papers	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	Audit Reports, including Management Action Plan	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	Recommendation follow up	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

INTERNAL AUDIT (SHARED SERVICES 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	Fraud and Irregularity working papers and reports	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 SERVICES 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	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

							cover letter, business activities, case file information, business activities					
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INTERNAL AUDIT (SHARED SERVICES 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	Annual Planning Process	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	Audit Board and Audit Committee Reports	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	Minutes of Team Meetings	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	Performance Indicators	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	Operational Risk Registers	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	Strategic Risk Register (for SDC only)	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	General correspondence – emails, letters, memos etc.	N/A	1 year unless considered important for future reference	Common Practice	Secure disposal	Yes – contact details	N/A	No	N/A	Electronically on the audit s: drive	N/A

INTERNAL AUDIT (SHARED SERVICES 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 SERVICES 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 ¹	Compliant Pentana - BS ISO/IEC 27001:2013 compliant Secure Waste Disposal – confidentiality clause in contract Compliant	N/A	YES – Medium - 4

Joint Services with Sevenoaks District Council - 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

Retention periods relating to Internal Audit are published by us.

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

Directorate	Information Asset Owner	Record/Information Description	DPIA ⁱⁱ	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	Procedure/guidance 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	Local Land Charges Register - the activity of maintaining local authority information pertaining to land and property including 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	Requisitions for Searches and Enquiries	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	Performance Indicators – 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	Correspondence (general) – emails, letters, memos etc.	N/A	1 year unless considered important for future reference	Common Practice	Secure disposal	Yes (identifiable natural persons only) – name, address, contact details	Public interest task- in accordance with the legislation referred to in this IAR	No	N/A	Paper copy/ electronic/Idox/ Uniform	N/A

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	Computer systems/laptops/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
Growth & Community	Community Development Manager	Pentana – maintenance & administration	BS ISO/IEC 27001:2013 compliant
Corporate Services	Property Information Consultant	Pentana – input of land charges data	Password administration
Corporate Services	Property Information Consultant in consultation 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 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	Directors' General Correspondence – 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	Minutes of Senior Managers/Directors meetings	N/A	1 year	Common Practice	Secure disposal	No	N/A	No	N/A	Electronic	No
Relevant Director – to MPA for logging purposes	Ukrainian Officer Working Group – 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)	MP's Enquiries – 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	Grants – 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	No	N/A	Electronic and paper copy	No

							Section 2(1) LGA 2000 (as applicable)				
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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)	Hospitality Register – 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	Minutes of Corporate Wellbeing Group meetings	N/A	1 year	Common Practice	Secure disposal	No	N/A	No	N/A	Electronic	No
Democratic Services Manager to MPAs (for administration purposes)	Remembrance Sunday – 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	Strategic Risk Register	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)	Disclosable Pecuniary Interests' Register – Members' 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	No
Monitoring Officer -to MPAs (for logging entries electronically)	Gifts and Hospitality Register (Councillors) – 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	No
Monitoring Officer & MPAs (for logging entries electronically)	Voluntary Interests' Register -Members' 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 - (identifiable natural persons only) - contact details and interest entries	ditto	No	N/A	Electronic and paper copies	No
MPAs (for administrative support)	Civic Ceremonies & VIP visits – invitations. labels etc.(Council related matters e.g. hosting and event)	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)	Events & VIP visits – invitations. labels etc.(Council related matters e.g. hosting and event)	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)	Complaints - Record of complaints received - - emails letters etc.	N/A	2 years	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)	Dartfordian Awards – 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)	The conduct of Mayoral business by the incumbent Mayor - general 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)	Environmental Information (EIR) – Pentana - 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	Procedure/guidance 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	Property matters – 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	Deeds – 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	Contract files - 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	Court/Tribunals judgments/orders	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	Orders - 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	Correspondence (general) – emails, letters, memos etc.	N/A	1 year unless considered important for future reference	Common Practice	Secure disposal	Yes (identifiable natural persons only) – name, address, contact details	Public interest (subsidiary activity)	No	N/A	Paper copy/ Electronic/ Idocs	N/A
Corporate Services	Head of Legal Services	Town & Country Planning - 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 Dedicated IP address, up-to-date encryption protocols etc.

Corporate Services	Head of Legal Services	Disaster recovery	See Business Continuity Plan	
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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	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

				retain decisions (see below)									
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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	Decisions – Monitoring Officer/ Court/Ombudsman/ Hearing Panel/DPI Kent Police Referrals	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	Hearing Panel – 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	Anonymised statistical information 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	Collection of anonymised data of complainants' diversity information - 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	Disclosable Pecuniary Interests' Register – 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	Gifts and Hospitality Register (Councillors) – 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	Voluntary Interests' Register -Members' 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	ditto	No	N/A	Electronic	N/A
Corporate Services	Monitoring Officer	General correspondence between MO and members – emails, letters etc.	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	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
All Directorates	Heads of Service	Computer systems/Intranet/Internet –input of data	Password administration
Growth & Community	Community Development Manager	Pentana – 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

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

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIAs ⁱⁱ	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
External Services	Head of Waste, Public Realm and Enforcement Services	Local Government & Social Care Ombudsman – 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
External Services	Head of Environmental Health and Regulatory Services	RIPA - authorisations database	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

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

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIA	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal/archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held Paper copy and/or on electronic systems (including mobile devices)	Children (under 13) - parental consent normally required
External Services	Parking Services Manager	Car Parking Enforcement – case file material – instructions, court orders, Penalty Charge Notices etc. PCN Schedule	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, 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 - Management Act 2004 Civil Enforcement of Parking Contraventions (England) General Regulations 2007	Paper copy &/or electronically in Idox and Parking Gateway (the IT platform for PC Notice Processing) (PCN number only – no car registration number or other personal details) Parkmobile (cashless parking)	N/A
External Services	Parking Services Manager	Resident permits, Business permits, dispensations, resident exceptions, season permits. Car Parking Visitors Scratch Cards	N/A	All these permits and associated details will be retained for 7 years for financial purposes, however, personal details will be deleted after 2 years 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	Paper copies are scanned electronically in Idox and Parking Gateway (the IT platform for PC Notice Processing) (PCN number only – no car registration number or other personal details) N/A for Parking Services. Finance and Customer Services keep their information	N/A

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

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIA	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal/archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held Paper copy and/or on electronic systems (including mobile devices)	Children (under 13) – parental consent normally required
External Services	Head of Waste, Public Realm and Enforcement Services	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	Disposal	No	N/A	No	N/A	Electronic on Pentana	N/A
External Services	Head of Waste, Public Realm and Enforcement Services	Correspondence (general) – emails, letters, memos etc.	N/A	1 year unless considered important for future reference	Common Practice	Secure disposal	Yes - (identifiable natural persons only) - name, address, contact details	Public interest task –in accordance with the legislation referred to in this IAR (as applicable)	No	N/A	Paper copy &/or electronic	N/A

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

TECHNICAL & ORGANISATIONAL SECURITY MEASURES

Strategic Directorate	Information Asset Owner	IT Systems	Security Measures
Internal Services	Head of IT	Idox/UNIFORM and department computers and laptops/on-line/telephone payment 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, DPIAs, DPA contract provisions
Internal Services	Policy and Performance Manager	Pentana – maintenance & administration	BS ISO/IEC 27001:2013 compliant
External Services	Head of Waste, Public Realm and Enforcement Services	Idox/UNIFORM/ Pentana and computers and laptops/Internet/ Intranet - – input of data – the enforcement & regulatory function	Use of passwords
Internal Services	Customer Services Manager	On-line payments (hosted by Capita)	PCIDSS compliant
External Services	Head of Waste, Public Realm and Enforcement Services	Disaster recovery	See Business Continuity Plan

AUTOMATED DECISION MAKING

Strategic Directorate	Information Asset Owner	DPIA	Record/Information/ description	DPA requirements

PARKING SERVICES - 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	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	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 LA Support Ltd (Fixed Penalty Notices - littering& dog control Stanford & Green Ltd (Bailiffs) –parking contravention enforcement Newlyn PLC (Debt Recovery)) Park- Mobile UK Ltd (cashless parking)	Pentana - BS ISO/IEC 27001:2013 compliant Secure Waste Disposal – confidentiality clause in contract K&MISA- - compliant Dartford CCTV Code of Practice - compliant LA Support Ltd - compliant Stanford & Green Ltd (Bailiffs) – compliant Newlyn PLC - compliant Park-Mobile UK Ltd compliant	N/A	N/A	Enforcement, Parking Services, Licensing & Community Safety – Medium – risk score - 4 Town Centre Management – Low - risk score - 2

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

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIA ⁱⁱ	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal/archive	Personal Data ⁱⁱ	Lawful basis for processing personal data ⁱⁱ	Sensitive data ⁱⁱ	Lawful basis for processing sensitive data ⁱⁱ	Held manually and/or on electronic systems (including mobile devices) ⁱⁱ	Children (under 13) – parental consent normally required ⁱⁱ
External Services	Head of Waste, Public Realm and Enforcement	Procedure/guidance on a range of matters		Supersedes preceding version	Common Practice	Archive	No	N/A	No	N/A	Electronic	N/A
External Services	Head of Waste, Public Realm and Enforcement	Allotments	N/A	3 years from date of file closure	Common Practice	Secure Disposal	Yes (identifiable natural persons only)	Performance of a contract/taking steps preparatory to such a contract	No	N/A	Paper copy &/or electronically in Idox	N/A
External Services	Head of Waste, Public Realm and Enforcement	Grounds Maintenance	N/A	12 years after terms of contract have expired.	Common Practice	Archive	Yes (identifiable natural persons only)	Performance of a contract/taking steps preparatory to such a contract	No	N/A	Paper copy in Deed Room &/or electronically in Idox	N/A

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

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIA	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal/archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held manually and/or on electronic systems (including mobile devices)	Children (under 13) - parental consent normally required
External Services	Head of Waste, Public Realm and Enforcement	Playgrounds	N/A	21 years following inspection in case of insurance claim.	Statutory Practice	Disposal	No	N/A	No	N/A	Manual & Electronic Paper copy in Deed Room &/or electronically in Idox	N/A
External Services	Head of Waste, Public Realm and Enforcement	Friends of Groups	N/A	Indefinite until advised accordingly	Common Practice	Disposal	Yes (identifiable natural persons only)	Yes request by individual	No	N/A	Electronic	N/A
External Services	Head of Waste, Public Realm and Enforcement	Football Pitches	N/A	Indefinite until advised accordingly	Common Practice	Disposal	Yes (identifiable natural persons only)	Performance of a contract/taking steps preparatory to such a contract	No	N/A	Electronic	N/A
External Services	Head of Waste, Public Realm and Enforcement	Security	N/A	6 years after terms of contract have expired	Statutory Practice ?	Disposal	Yes (identifiable natural persons only)	Performance of a contract/taking steps preparatory to such a contract	No	N/A	Electronic Paper copy in Deed Room &/or electronically in Idox	N/A
External Services	Head of Waste, Public Realm and Enforcement	Graffiti	N/A	For duration of contract	Common Practice	Disposal	No	N/A	No	N/A	Electronic Paper copy in Deed Room &/or electronically in Idox	N/A
External Services	Head of Waste, Public Realm and Enforcement	Public Conveniences	N/A	6 years after terms of contract have expired	Common Practice	Disposal	No	N/A	No	N/A	Electronic Paper copy in Deed Room &/or electronically in Idox	N/A
External Services	Head of Waste, Public Realm and Enforcement	Trees	N/A	Permanent	Common Practice	Archive	Yes (identifiable natural persons only)	Performance of a contract/taking steps preparatory to such a contract	No	N/A	Electronic	N/A
External Services	Head of Waste, Public Realm and Enforcement	Bedding Plants	N/A	6 years after terms of contract have expired	Common Practice	Disposal	No	N/A	No	N/A	Electronic Paper copy in Deed Room &/or electronically in Idox	N/A

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

External Services	Head of Waste, Public Realm and Enforcement	Hanging Baskets	N/A	6 years after terms of contract have expired	Common Practice	Disposal	No	N/A	No	N/A	Electronic Paper copy in Deed Room &/or electronically in Idox	N/A
External Services	Head of Waste, Public Realm and Enforcement	Café in the Park	N/A	12 years after terms of contract have expired	Common Practice	Disposal	Yes (identifiable natural persons only)	Performance of a contract/taking steps preparatory to such a contract	No	N/A	Electronic Paper copy in Deed Room &/or electronically in Idox	N/A
External Services	Head of Waste, Public Realm and Enforcement	Complaints – case file material	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)	Public interest	No	N/A	Electronic	N/A
External Services	Head of Waste, Public Realm and Enforcement	Local Government & Social Care Ombudsman – case file material - complaints received and outcomes	N/A	1 year from date of case closure	Common Practice	Secure Disposal	Yes (identifiable natural persons only)	Legal obligation compliance	N/A	N/A	Paper copy &/or electronically in Idox	N/A

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

TECHNICAL & ORGANISATIONAL SECURITY MEASURES

Strategic Directorate	Information Asset Owner	IT Systems	DPIA	Security Measures
Internal Services	Head of IT	Idox/UNIFORM/Academy and department computers and laptops – maintenance and administration		Password administration, data encryption, implementation of PSN based email services, IT services contingency planning, firewall barriers to hackers, virus protection software, full back-up, rescue disks, security audits, regular testing, assessing and evaluating the effectiveness of technical and organisational measures for ensuring the security of the processing, corporate guidance on organisational/security measure, DPIAs
Internal Services	Policy & Corporate Support Manager???	Covalent – maintenance & administration		BS ISO/IEC 27001:2013 compliant
External Services	Head of Waste, Public Realm and Enforcement	Idox/UNIFORM Academy/Covalent and computers and laptops – input of data – the parks and open spaces function	N/A	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

CONSENT, OUTSIDE EEA TRANSFERS, DATA PROCESSOR AND RISKS

Strategic Directorate	Information Asset Owner	Record/Information Description	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?	Risk category (to be mapped in accordance with the Council's corporate/strategic risk impact table) Operational Risk Register updated YES/NO
External Services	Head of Waste, Public Realm and Enforcement	Personal/sensitive data	Identifiable natural persons such as leaseholders, tenants, complainants, applicants, service users etc.	1.Council department(s) 2.Ombudsman 3. Continental Landscapes Ltd	Grounds maintenance contract to be reviewed	NO	Covalent – Cloud based – retention only Secure Waste Disposal - no processing - when confidential white sacks handed over, limited to operatives putting papers in the shredding machine in back of	Covalent - BS ISO/IEC 27001:2013 compliant Secure Waste Disposal – confidentiality clause in contract SDC bulk printing SLA – to be reviewed to include	

							lorry in Council car park Review security of confidential white sacks in offices SDC bulk printing – no processing	confidentiality requirements	
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PLANNING SERVICES (INCLUDING FORWARD PLANNING & TPOs) - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

Directorate	Information Asset Owner	Record /Information Description	DPIA ⁱⁱ	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	Production of Planning Policy documents and topic evidence	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	Strategic Development Monitoring Data	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	Forward Planning of sites, including Brownfield Land Register, 5 year housing land supply etc.	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	Planning Strategy/Consultations -correspondence etc.	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, Town and Country Planning Act 1990	No	N/A	Paper copy &/or electronically in Idox/Planning Portal	N/A
Growth and Community	Head of Planning Services	Traffic Regulation Order Consultations – letters, emails, memos, spreadsheets etc.	N/A	2 years from scheme installation date Or where informal consultation not progress, 2 years from the	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

				consultation close date								
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PLANNING SERVICES (INCLUDING FORWARD PLANNING & TPOs) - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

Growth and Community	Head of Planning Services	Traffic Regulation Order Consultations – letters, emails, memos, spreadsheets etc.	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
Growth and Community	Head of Planning	Public Realm/Active Travel projects: Consultations and implementation- Letters, emails, spreadsheets	N/A	2 years from scheme final completion and where applicable reversion to KCC	Common Practice	Disposal	Yes (identifiable natural persons only) - name, address, contact details	Public interest task - Road Traffic Regulation Act 1984 Highways Act 1980	No	No	Electronic	N/A

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

Growth and Community	Head of Planning	Public Realm/Active Travel contracts for works	N/A	<p>Statutory Liability Period (usually 6 years from the date the right to claim arose or 12 years if the contract is executed as a deed.)</p> <p>or</p> <p>Defects Liability Period, where this is later than the statutory liability period.</p>				<p>Performance of a contract</p> <p>Construction (Design and Management) Regulations 2015, Highway Act 1980 NSRWA Act 1991 Procurement Regulations 2024 Health and Safety at Work Act 1974</p>				
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PLANNING SERVICES (INCLUDING FORWARD PLANNING & TPOs) - 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	Planning application process – case file material including reports, and decisions, applications, approvals, and consultations, background information, consultation responses, site photos, reports, S106s/Unilaterals, 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	Pre-application enquiries – 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, NPPF.	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	The process of planning enforcement –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 & TPOs) - 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	National Strategic Infrastructure Projects – 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	Tree Preservation Orders – 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	Hedgerow Regulations - 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	Section 106 Agreements/Unilateral Undertakings – 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	CIL Process – case file material – CIL initial information, assumption of liability, application for exemption and relief, other	N/A	10 Year from issue of Demand Notice unless	Common Practice	Secure disposal	Yes (identifiable natural persons only) -	Public interest task - Community Infrastructure Levy	No	N/A	Electronically, Idox Paper copies where relief or exemption 'has	N/A

		supporting evidence materials, Requests for review, appeals		related to on-going enforcement for payment			name, address, contact details	Regulations 2010, – Town and Country Planning Act 1990			been granted and claw- back' period in operation	
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PLANNING SERVICES (INCLUDING FORWARD PLANNING & TPOs) - 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	CIL Funding – 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	High Hedges -case file material, applications, correspondence	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, ISOX Paper copies retained whilst proposal under consideration	N/A
Growth and Community	Head of Planning Services	Hazardous Substances – case file material including reports, and decisions, applications, approvals, and consultations, background information, consultation responses, site photos, reports, S106s/Unilaterals, 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 - Planning (Hazardous Substances) Act 1990 and 2015 Regulations	Yes-offences	Substantial public interest- Planning (Hazardous Substances) Act 1990 and 2015 Regulations	Electronic, IDOX Paper copies retained whilst proposal under consideration	N/A
Growth and Community	Head of Planning Services	Local Government & Social Care Ombudsman – 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	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 application/ planning enforcement matter in which case retention will be permanent as set out								
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PLANNING SERVICES (INCLUDING FORWARD PLANNING & TPOs) - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

Growth and Community	Head of Planning Services	General correspondence – 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	Electronic	N/A
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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
Growth and Community	Head of Planning Services	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	Disposal	No	N/A	No	N/A	Electronic on Pentana	N/A
Growth and Community	Head of Planning Services	Leader's Advisory Group - 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	Contract staff -Recruitment selection, emails, contracts	N/A	1 year after contract ends	Common Practice	Secure disposal	Yes - (identifiable natural persons only) – name, address, contact details	Performance of a contract/taking steps preparatory to such a contract	Yes – health data etc.	Performance of a contract/taking steps preparatory to such a contract	Electronic	N/A
Growth and Community	Head of Planning Services	Contracts for service provision: Tree advice Heritage asset advice	N/A	6 years after contract end	Common practice	Secure disposal	Performance of a contract/taking steps preparatory	Performance of a contract/taking steps preparatory to	No	N/A	Electronic	N/A

		Planning guidance documents					to such a contract	such a contract				
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PLANNING SERVICES (INCLUDING FORWARD PLANNING & TPOs) - 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/Planning Portal/Academy/Internet/Intranet and department computers and laptops – 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	Pentana – maintenance & administration	BS ISO/IEC 27001:2013 compliant
Growth & Community	Head of Planning Services	Idox/UNIFORM/Planning Portal/Academy/Pentana/Internet/Intranet and computers and laptops - -- input of data – the planning process function	Use of passwords
Growth and Community	Head of Planning Services	DBC website – property history	Accessible to the public
Corporate Services	Head of IT & Transformation	Stay Connected (DBC website) – maintenance & administration	Customer password input and unsubscribe
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
Growth & Community	Head of Planning Services	Disaster recovery	See Business Continuity Plan
Housing & Public Protection	Enforcement & Regulatory Services Manager	CCTV – maintenance and administration	A key part of the Council's security setup

PLANNING SERVICES (INCLUDING FORWARD PLANNING & TPOs) - 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 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.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)

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIA ⁱⁱ	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
External Services	Head of Housing	Policies/strategies 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
External Services	Head of Housing	Fees for HMO/Caravan Sites' Licensing – schedule of fees	N/A	Supersedes previous version	Common Practice	Disposal	No	N/A	No	N/A	Electronic	No
External Services	Head of Housing	Single household disrepair case management and harassment & illegal eviction cases - 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
External Services	Head of Housing	Houses in Multiple Occupation – checking standards/hazards under the Housing Act 2004 including HMO Management Regulations - 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 &/or electronic	N/A – but see safeguarding

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

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIA ⁱⁱ	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
External Services	Head of Housing	Houses in Multiple Occupation Licensing – 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
External Services	Head of Housing	Caravan Site Licences – site information, site owner personal data for licence. Public Register	N/A	2 years after expiry 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
External Services	Head of Housing	Empty properties - 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

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

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIA ⁱⁱ	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
External Services	Head of Housing	Enforcement Action – formal actions – 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 compliance with enforcement action (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
External Services	Head of Housing	Disabled Facilities Grants- 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

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

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIA	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal/archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held manually and/or on electronic systems (including mobile devices)	Children (under 13) - parental consent normally required
External Services	Head of Housing	Discretionary Assistance – 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)

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIA	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal/archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held manually and/or on electronic systems (including mobile devices)	Children (under 13) - parental consent normally required
External Services	Head of Housing	Energy Efficiency – 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 and Public Protection	Head of Housing	BEIS LAD1a Energy Efficiency/retrofit measures	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
External Services	Head of Housing	Housing condition reports for Immigration Inspections – 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
External Services	Head of Housing	Emergency works - Unsafe conditions in residential accommodation – case file material –	N/A	3 years from date of file closure (may need to be kept beyond the	Common Practice	Secure Disposal	Yes- (identifiable natural persons only - name,	Public interest task – Housing Act 2004	No	N/A	Paper copy/ electronic	N/A

		correspondence, notices etc.		retention e.g. for evidential purposes)			address, contact details					
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PRIVATE SECTOR HOUSING - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIA	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal/archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held manually and/or on electronic systems (including mobile devices)	Children (under 13) - parental consent normally required
External Services	Head of Housing	Adaptations, small handy person jobs and information for older or disabled people -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
External Services	Head of Housing	Works in default of enforcement action –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
External Services	Head of Housing	Collective Switching – 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
External Services	Head of Housing	LA Flexible Eligibility Programme - 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
External Services	Head of Housing	Winter Warmth	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 2017t	Paper copy/electronic	N/Z

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

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIA	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal/archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held manually and/or on electronic systems (including mobile devices)	Children (under 13) - parental consent normally required
External Services	Head of Housing	Kent & Medway Sustainable Energy Partnership (Kent Warm Homes Scheme) - warm homes initiative	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
External Services	Head of Housing	Interreg 2 Seas Mers Zeeen - Triple – A - adoption of low-carbon technologies by home-owners 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
External Services	Head of Housing	Home Energy Conservation Act biannual reports	N/A	5 years	Common Practice	Disposal	No	N/A	No	N/A	Paper copy/electronic	N/A
External Services	Head of Housing	Kent & Medway Fire & Rescue Authority – 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
External Services	Head of Housing	Correspondence (general) – 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 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
External Services	Head of Housing	Performance Indicators - for the PSH function	N/A	If a performance indicator is no longer required, deactivate archive the indicator and delete from Pentana after 1 year	Common Practice	Disposal	No	N/A	No	N/A	Electronic – on Pentana	N/A
External Services	Head of Housing	Greenhouse Gas Emissions -reporting to Government	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

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

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIA	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal/archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held manually and/or on electronic systems (including mobile devices)	Children (under 13) - parental consent normally required
External Services	Head of Housing	Display Energy Certificates and Energy performance certificates	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
External Services	Head of Housing	Warmer Street Project - correspondence etc.	N/A	5 years (may need to be kept beyond the retention period for evidential purposes)	Common practice	Secure disposal	Yes – names, addresses etc.	Public interest task - Home Energy Conservation Act 1995	No	N/A	Paper copy/electronic	N/A
External services	Head of Housing	Rogue landlords & letting agents – 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
External Services	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
External Services	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. (as applicable)	Substantial public interest task – Section 26(5) Local Government Act 1974	Paper copy &/or electronic in Idocs	N/A
Housing and Public Protection	Head of Housing	Fuel Poverty Schemes – alleviating fuel poverty	Na	5 years	Common practice	Secure disposal	Yes - (identifiable natural persons only - name, address, contact	Public interest task – Home Energy Conservation Act 1995 Digital Economy Act 2017	Yes Health and financial data	Substantial public interest – Home Energy Conservation Act 1995	Paper copy &/or electronic in Idocs	n/a

							details, financial data			Digital Economy Act 2017		
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PRIVATE SECTOR HOUSING - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

Housing and Public Protection	Head of Housing	BEIS LAD1b Energy Efficiency/retrofit scheme	yes	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 Digital Economy Act 2017	Yes health and financial data	Substantial public interest – Home Energy Conservation Act 1995 Digital Economy Act 2017	Paper copy &/or electronic in Idocs	n/a
Housing and Public Protection	Head of Housing	BEIS LAD2 Energy efficiency/retrofit scheme	yes	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 Digital Economy Act 2017	Yes health and financial data	Substantial public interest – Home Energy Conservation Act 1995 Digital Economy Act 2017	Paper copy &/or electronic in Idocs	n/a
Housing and public protection	Head of housing	BEIS LAD3 Sustainable Warmth Energy efficiency/retrofit scheme	yes	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 Digital Economy Act 2017	Yes health and financial data	Substantial public interest – Home Energy Conservation Act 1995 Digital Economy Act 2017	Paper copy &/or electronic in Idocs	n/a
Housing and public protection	Head of housing	HUG2 Energy efficiency/retrofit scheme	yes	25 years	Common practice	Secure disposal	Yes - (identifiable natural persons only - name, address, contact details, financial data	Public interest task – Home Energy Conservation Act 1995 Digital Economy Act 2017	Yes health and financial data	Substantial public interest – Home Energy Conservation Act 1995 Digital Economy Act 2017	Paper copy &/or electronic in Idocs	n/a
Housing and public protection	Head of housing	Household support Fund – boiler replacement	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 Digital Economy Act 2017	Yes health and financial data	Substantial public interest – Home Energy Conservation Act 1995 Digital Economy Act 2017	Paper copy &/or electronic in Idocs	n/a
Housing and public protection	Head of housing	Housing stock data – analysing data to help plan and develop private sector housing strategy	n/a	7 years	Common practice	Secure disposal	Yes - (identifiable natural persons only - name, address, contact	Public interest task – Home Energy Conservation Act 1995 Digital Economy Act 2017	Yes health and financial data	Substantial public interest – Home Energy Conservation Act 1995	Paper copy &/or electronic in Idocs	n/a

							details, financial data			Digital Economy Act 2017		
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PRIVATE SECTOR HOUSING - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIA	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal/archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held manually and/or on electronic systems (including mobile devices)	Children (under 18) -
External Services	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 Care & Support Statutory Guidance	Paper copy &/or electronic	Yes
External Services	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 electronically in Idox	YES – with parental consent

PRIVATE SECTOR HOUSING - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA) TECHNICAL & ORGANISATIONAL SECURITY MEASURES

Strategic Directorate	Information Asset Owner	IT Systems	Security Measures
Internal Services	I.C.T. Manager	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 contract provisions .
External Services	Head of Housing	Idox/UNIFORM and computers and laptops/Internet/ Intranet - - input of data – PSH functions	Use of passwords
Internal Services	Customer Services Manager	On-line payments (hosted by Capita)	PCIDSS compliant
External Services	Head of Housing	Disability Facilities Grant – financial assessment using FERRET program	User password
Internal Services	I.C.T. Manager	Stay Connected email alerts (DBC website)	Subscriber own password – unsubscribe at any time
External Services	Head of Housing	Disaster recovery	See Business Continuity Plan
External Services	Enforcement & Regulatory Services Manager	CCTV	A key part of the Council's security setup
External services	Head of Housing	Collective Switching	Use of passwords
External Services	Head of Housing	Warm Homes	Use of passwords
External Services	Head of Housing	LA Flex	Use of passwords
External Services	Head of Housing	Government Energy Efficiency/Retrofit Schemes	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.	<ol style="list-style-type: none"> 1.Council department(s) 2. Courts/tribunals etc. 3.Housing Associations 4.Contractors 5.Ombudsmen 6.Peabody 7.Kent & Medway Fire & Rescue Authority 8.KCC 9.NHS 10.Social Services 11.Mortgage providers 12DFG agents 13.EE installers 14.Utilities (Digital Economy Act 2017) 15.Darent Valley Hospital 16.iChoosr 	N/A	N/A	<p>Pentana – Cloud based – retention only</p> <p>Secure Waste Disposal - no processing -</p> <p>Kent & Medway Information Sharing Agreement</p> <p>Aran Services Limited (LA Flexibility Eligibility Programme (loft/cavity)</p> <p>Peabody (Handyperson Scheme)</p> <p>iChoosr (collective switching scheme)</p> <p>Kent & Medway Sustainable Energy Partnership – Kent Warm Homes Framework ISA</p> <p>Kent & Medway Fire & Rescue Authority Fire Safety Protocol</p> <p>Contracts for Works in default/emergency remedial action</p>	<p>Pentana - BS ISO/IEC 27001:2013 compliant</p> <p>Secure Waste Disposal – confidentiality clause in contract</p> <p>KMISA - compliant</p> <p>Aran Services Ltd - compliant</p> <p>Peabody</p> <p>iChoosr</p> <p>Kent Warm Homes Framework (ISA)</p> <p>KFRS -</p> <p>Works in default etc.</p>	N/A	N/A	YES –HIGH – risk score 9

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

Directorate	Information Asset Owner	Record/Information Description	DPIAs ⁱⁱ	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	CCTV (installed in the Borough of Dartford and outside Council premises), Body Camera Footage and Vehicle Dashcam – images and audio	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

REGULATORY 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	Community Safety Manager	CCTV Activity Log	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
Housing and Public Protection	Head of EH&RS	Local Government & Social Care Ombudsman – 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	RIPA - authorisations database	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

REGULATORY 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	Community Safety Manager	Community Safety - 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	Public Spaces Protection Order offences - 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	Charity Street Collections – 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

REGULATORY 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	Licensing Manager	Licensing (Hackney Carriage & Private Hire) – 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	Licensing (Hackney Carriage & Private Hire) – 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

REGULATORY 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	Licensing Manager	Licensing (Hackney Carriage & Private Hire) – NAFN (NR 3) Register - 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

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

REGULATORY 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	Licensing Manager	Statements' of Licensing Policy	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	Dartford Town Against Crime (DTAC) Scheme - 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	ShopSafe ID Scheme	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	Head of EH&RS	Correspondence (general) – emails, letters, memos etc.	N/A	1 year unless considered important for future reference	Common Practice	Secure disposal	Yes - (identifiable natural persons only) - name, address, contact details	Public interest task –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	CSU Daily Tasking – 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

REGULATORY 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
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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
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REGULATORY 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/on-line/telephone payment 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, DPIAs, DPA contract provisions
Growth & Community	Community Development Manager	Pentana – maintenance & administration	BS ISO/IEC 27001:2013 compliant
Housing & Public Protection	Head of EH&RS	Idox/UNIFORM/ /Pentana and computers and laptops/Internet/ Intranet - – input of data – the enforcement & regulatory function	Use of passwords
Growth & Community	Customer Services Manager	On-line payments (hosted by Capita)	PCIDSS compliant
Housing & Public Protection	Head of IT & Transformation	Disaster recovery	See Business Continuity Plan
Housing & Public Protection	Community Safety Manager	CCTV - maintenance & administration	A key part of the Council's security setup

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

AUTOMATED DECISION MAKING

Directorate	Information Asset Owner	DPIA	Record/Information/ description	DPA requirements
Housing & Public Protection	Licensing Manager	Yes	Taxi/private hire drivers' English tests (Varsent)	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 (for NR3 register 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	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	N/A	N/A	Enforcement, Parking Services, Licensing & Community Safety – Medium – risk score - 4 Town Centre Management – Low - risk score - 2

				LA Support Ltd (Fixed Penalty Notices - littering& dog control) Stanford & Green Ltd (Bailiffs) –parking contravention enforcement Newlyn PLC (Debt Recovery)) Park- Mobile UK Ltd (cashless parking)	LA Support Ltd - compliant Stanford & Green Ltd (Bailiffs) – compliant Newlyn PLC - compliant Park-Mobile UK Ltd compliant			
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RETURNING OFFICER - INFORMATION ASSET REGISTER & RECORD OF PROCESSING ACTIVITY (ROPA)

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	Hold manually and/or on electronic systems (including mobile devices) - list systems/devices	Recipients (including internal Contract/ISA Checked - to be varied to Council departments) of requirements & ISAs personal/sensitive data	Data Processor (i.e. processing undertaken by an external organisation under contract)	Data Processor Incorporate GDPR
ELECTIONS Electoral Registration Officer - Civic Centre Home Gardens Dartford Kent DA1 1DR	ELECTIONAL PROCESS													
ELECTIONAL REGISTER 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
ELECTIONS 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 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 Court	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	CEO/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)
ABSENT VOTING 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 & AvenISGuard)	IT	N/A	N/A

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

Directorate	Information Asset Owner	Record/Information Description	DPIA ⁱⁱ	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal/archive	Personal Data ⁱⁱ	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	Procedure/guidance 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	Stage One – 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	Stage Two - 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

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/archi ve	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	No	N/A	Electronically	

								Freedom Act 2012				
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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 ⁱⁱ	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	Procedure/guidance 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	Online Address Request Form – 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	SNN Paperwork – 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

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

Directorate	Information Asset Owner	Record/Information Description	DPIA ⁱⁱ	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	Correspondence (general) – emails, letters, memos etc.	N/A	1 year unless considered important for future reference	Common Practice	Secure disposal	Yes (identifiable natural persons only) - name, address, contact details	Public interest task – 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	Idox and computers and laptops - -- 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	Pentana – maintenance & administration	BS ISO/IEC 27001:2013 compliant
Corporate Services	Address Management & GIS Officer	Pentana – input of street naming data PIs	Password administration
Corporate Services	Address Management & GIS Officer in consultation with IT Services support	Disaster recovery	See Business Continuity Plan

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 ⁱⁱ	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	Policies/strategies - 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	The process for applying for council housing – 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	Anti-Social Behaviour – 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

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	The process for managing the tenancy of an individual - 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	The process for managing the tenancy of an individual – 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	Court Orders	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	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	Paper copy and/or electronic	N/A

								Crime and Policing Act 2014		Crime and Policing Act 2014		
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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	Rent arrears management - correspondence, sent, received, notes on One, 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 (One Housing)	N/A
Housing & Public Protection	Head of Housing	Procurement relating to estate services	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	Resident meeting 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	Issuing requests to contractors for individual properties – 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	Performance Indicators - 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	General Correspondence – 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 & Paper copies	N/A
Housing & Public Protection	Head of Housing	Housing Ombudsman & Local Government & Social Care Ombudsman 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	CSU Daily Tasking - 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

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	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 infreemation	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 electronically in Idox	YES – with parental consent

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 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 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 One/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

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

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

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIA ⁱⁱ	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
External Services	Head of Waste, Public Realm and Enforcement	Procedures and guidance -on a range of service matters	N/A	Supersedes preceding version	Common Practice	Superseded	No	N/A	No	N/A	Electronic	N/A
External Services	Head of Waste, Public Realm and Enforcement	Refuse Collection and Street Cleansing – successful tender - 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 - Idox	N/A
External Services	Head of Waste, Public Realm and Enforcement	Refuse Collection and Street Cleansing - contract management – 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
External Services	Head of Waste, Public Realm and Enforcement	Refuse Collection and Street Cleansing transfer notes and related documents	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

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

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIA	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal/archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held manually and/or on electronic systems (including mobile devices)	Children (under 13) - parental consent normally required
External Services	Head of Waste, Public Realm and Enforcement	Waste Collection data – 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	No	N/A	Paper copy &/or electronic - UNIFORM	N/A
External Services	Head of Waste, Public Realm and Enforcement	Routine Service Requests – 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
External Services	Head of Waste, Public Realm and Enforcement	Complaints – case file management – correspondence etc.	N/A	2 years from date of case closure unless exceptional circumstances require longer retention e.g. pending court case	Common Practice	Secure Disposal	Yes - (identifiable natural persons only) - name , address, contact details	Public interest task pursuant to Sections 45 and 49 Environmental Protection Act 1990 (as applicable)	No	N/A	Paper copy &/or electronically	N/A
External Services	Head of Waste, Public Realm and Enforcement	Local Government & Social Care Ombudsman – 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 - Idox	N/A
External Services	Head of Waste, Public Realm and Enforcement	Abandoned Vehicles – 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 registration data etc.	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

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

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIA	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal/archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held manually and/or on electronic systems (including mobile devices)	Children (under 13) - parental consent normally required
External Services	Head of Waste, Public Realm and Enforcement	Performance Indicators - statistical information (anonymised)	N/A	If a performance indicator is no longer required, deactivate and archive the indicator and delete from Pentana after 1 year	Common Practice	Disposal	No	N/A	No	N/A	Electronic - Pentana	N/A
External Services	Head of Waste, Public Realm and Enforcement	Correspondence (general) – emails, letters, memos etc.	N/A	1 year unless considered important for future reference	Common Practice	Secure Disposal	Yes – (identifiable natural persons only) - name , address, contact details	Public interest task – pursuant to legislation referred to in this IAR	No	N/A	Paper copy &/or electronically	N/A

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

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIA	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal/archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held manually and/or on electronic systems (including mobile devices)	Children (under 18) -
External Services	Head of Waste, Public Realm and Enforcement	Safeguarding Referrals (children & adults at risk)	N/A	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

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

TECHNICAL & ORGANISATIONAL SECURITY MEASURES

Strategic Directorate	Information Asset Owner	IT Systems	Security Measures
Internal Services	Head of IT	Idox/UNIFORM/Academy 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
Internal Services	Policy & Corporate Support Manager???	Pentana – maintenance & administration	BS ISO/IEC 27001:2013 compliant
Internal Services	Customer Services Manager	On-line payments (hosted by Capita)	PCIDSS compliant
External Services	Head of Waste, Public Realm and Enforcement	Disaster recovery	See Business Continuity Plan
External Services	Head of Waste, Public Realm and Enforcement	Idox/UNIFORM/Pentana and computers and laptops/Internet/Intranet - input of waste management data	Use of passwords
External Services	Head of Environmental Health and Regulatory Services	CCTV -administration and maintenance	A key part of the Council's security set up

WASTE MANAGEMENT - 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/NO
Identifiable natural persons such as leaseholders, tenants, complainants, applicants, service users etc.	1.Council department(s) 2.Ombudsman 3.Contractors 4.MP 5.Councillors 6.KCC	N/A	N/A	Pentana – Cloud based – retention only Secure Waste Disposal - no processing Amey LG Ltd – secure waste disposal	Pentana - BS ISO/IEC 27001:2013 compliant – contract to be reviewed Secure Waste Disposal – confidentiality clause in contract Secure waste disposal contract- contract to be reviewed	N/A	N/A	YES – LOW- risk score 2