

Record of Processing Activities (ROPA)

Record of Processing Activities (ROPA)

- Under Article 30 of the UK GDPR

VERSION CONTROL			
Version	Date Issued	Author	Update Information
V1.0	10/04/2018	B. Wilson	Original approved version.

Version Awareness

The audience of this document should be aware that a physical copy may not be the latest available version. The latest version, which supersedes all previous versions, is available on our website. Those to whom this policy applies are responsible for familiarising themselves periodically with the latest version and for complying with policy requirements at all times.

DOCUMENT CONTROL	
Prepared By	Data Protection Officer
Original Authorisation By	Senior Management Team
Review Period	One year
Classification	Public

Name and contact details of the Controller:	Oadby and Wigston Borough Council Brocks Hill Council Offices Washbrook Lane Oadby Leicestershire LE2 5JJ (0116) 2888961 www.oadby-wigston.gov.uk
Name and contact details of the Data Protection Officer:	Kristen Perkins Located at main Council offices (as above) (0116) 2888961 Data.protection@oadby-wigston.gov.uk
Purposes of the processing:	<p>We process personal information to enable us to provide a range of government services to local people and businesses which include:</p> <ul style="list-style-type: none"> • Maintaining our own accounts and records • Supporting and managing employees • Promoting the services we provide • Marketing our local tourism • Carrying out health and safety public awareness campaigns (or equivalent) • Managing our property • Providing leisure and cultural services • Provision of education (but not specific to schools) • Carrying out surveys • Administering the assessment and collection of taxes and other revenue including benefits and grants • Licensing and regulatory services • Local fraud initiatives • The provision of safeguarding / social services (but not social services carried out by Leicestershire County Council) • Crime prevention and prosecution of offenders including the use of CCTV • Corporate administration and all activities we are required to carry out as a data controller and public authority • Undertaking research • The provision of all commercial services including the administration (and enforcement) of parking regulations and restrictions, the use of our Community/bookable Centres, our leisure services and chargeable services. IE Garden Waste Service • The provision of all non-commercial activities including refuse collections from residential properties • Internal financial support and corporate functions

	<ul style="list-style-type: none"> • Managing archived records for historical and research reasons • Data matching under local and national fraud initiatives • Debt administration and factoring • The use of CCTV systems or monitoring equipment for public safety, enforcing PSPO, protection of life and property • Protection of life and property • Management of information technology systems • Physical information and administration • Public health • Prevention and control of disease within a community • Occupational health and welfare • Produce and distribute printed material • Management of public relations, journalism, advertising and media (including social media) • Sending promotional communications about the services we provide • Enable us to buy, sell, promote and advertise our products and services • Fundraising • Any duty or responsibility of the local authority arising from common or statute law.
<p>Lawful Basis for processing</p>	<p>Oadby and Wigston Borough Council will only collate data where it has a valid lawful basis for processing that data. The Council ensures at least one (but is not limited to one) of the six lawful bases for processing data is followed.</p> <p>These are defined by the Information commissioner’s office as:</p> <p><i>(a) Consent:</i> <i>the individual has given clear consent for you to process their personal data for a specific purpose.</i></p> <p><i>(b) Contract:</i> <i>the processing is necessary for a contract you have with the individual, or because they have asked you to take specific steps before entering into a contract.</i></p> <p><i>(c) Legal obligation:</i> <i>the processing is necessary for you to comply with the law (not including contractual obligations).</i></p> <p><i>(d) Vital interests:</i> <i>the processing is necessary to protect someone’s life.</i></p>

	<p>(e) Public task: <i>the processing is necessary for you to perform a task in the public interest or for your official functions, and the task or function has a clear basis in law.</i></p> <p>(f) Legitimate interests: <i>the processing is necessary for your legitimate interests or the legitimate interests of a third party unless there is a good reason to protect the individual's personal data which overrides those legitimate interests. (This cannot apply if you are a public authority processing data to perform your official tasks.)</i></p>
<p>Description of the categories of data subjects:</p>	<p>We process personal information about:</p> <ul style="list-style-type: none"> • Customers • Residents (and their household) • Suppliers • Staff, persons contracted to provide a service (next of kin) • Claimants • Complainants, enquirers or their representatives • Professional advisers or consultants • Students and pupils • Carers or representatives (this can include where we have written approval) • Landlords • Recipients of benefits • Witnesses • Offenders and suspected offenders • Licence (and permit) holders • Traders and others subject to inspection • People captured by CCTV images • Representatives of other organisations • Donors and potential donors to charitable causes
<p>Categories of personal data:</p>	<p>We process information relevant to the above reasons/purposes, which may include:</p> <ul style="list-style-type: none"> • Personal details • Family details • Household (and its usage) details • Lifestyle and social circumstances • Goods and services • Financial details • Employment and education details • Housing needs • Visual images, personal appearance and behaviour • Licenses or permits held • Student and pupil records (but not specific to schools)

	<ul style="list-style-type: none"> • Business activities • Case file information • Charitable interests <p>We also process sensitive classes of information that may include:</p> <ul style="list-style-type: none"> • Physical or mental health details • Racial or ethnic origin • Trade Union membership • Political affiliation • Political opinions • Offences (including alleged offences) • Religious or other beliefs of a similar nature • Criminal proceedings, outcomes and sentences • Biometric data • Genetic data
<p>Categories of recipients to whom personal data have been or will be disclosed</p>	<p>Where allowed by law, necessary, or required by law, we may share information with:</p> <ul style="list-style-type: none"> • Customers / Service users • Family, associates or representatives of the person whose personal data we are processing • Current, past and prospective employers • Healthcare, social and welfare organisations • Educators and examining bodies • Providers of goods and services • Financial organisations • Debt collection and tracing agencies • Private investigators • Service providers • Local and Central Governments • Ombudsman and regulatory authorities • Press and the media • Professional advisors and consultants • Courts and tribunals • Trade unions • Political organisations • Professional bodies / advisors • Survey and research organisations • Police forces • Housing association and landlords • Voluntary and charitable organisations • Religious organisation • Students and pupils including their relatives, guardians, carers or representatives

	<ul style="list-style-type: none"> • Data processors • Other police forces, non-home office police forces • Regulatory bodies • Courts and Prisons • Customs and Excise • International law enforcement agencies and bodies • Security companies • Partner agencies, approved organisations and individuals working with the police • Licensing authorities • Healthcare professionals • Law enforcement and prosecuting authorities • Legal representatives / defence solicitors • Police complaints authority • The disclosure and barring service • Charities and not for profit partners
<p>Transfers of personal data to third country & safeguards:</p>	<p>Transfers may take place when:</p> <ul style="list-style-type: none"> • Technical and organisational security measures have been put in place via a contract: or • With the consent of the data subject: or • Where required by law
<p>Time limits for erasure / disposal of data:</p>	<p>Oadby and Wigston Borough Council have a data retention policy that indicates a time period for personal data to be held by the organisation – the retention period is indicated by the nature of the enquiry and where possible, indicated by the department it relates to.</p> <p>This document can be found on our website on the Data protection / Privacy notices pages.</p>
<p>Technical and organisational security measures:</p>	<p>The Council takes organisational security measures such as, but not limited to:</p> <ul style="list-style-type: none"> • Encryption • Pseudonymisation • Anonymization • BCP and resilience planning including backups • Robust security updates including timely patching and anti-virus software • User access controls • Physical security – EG Clear desk policy, locked and secure building/rooms. • Risk assessment • Data protection Impact assessments • Staff training • Contractual requirements

Privacy notices:	The Council has published privacy notices for each service area that gathers personal data. More information relating to this can be found on the Council's website: www.oadby-wigston.gov.uk/pages/privacy
-------------------------	--

The Council has an obligation to ensure this document is up to date and contains all of the relevant information in terms of its processing activities. This 'Record of Processing Activities' document shall be made available to the relevant supervisory authority on request.