

## **Hawstead PC – GDPR**

### **Report to Council 19 July 2018**

Since the May meeting a small group of Councillors and volunteers met on 7 June to review what actions needed to be taken by the PC and any volunteers working under its umbrella to ensure that the PC is GDPR compliant. The main areas of interest were the HJ, the website and the village email list. The outcome of those discussions is set out in detail in the email dated 8 June 2018 attached below.

In summary, whilst the HJ and history recorders report are compiled and circulated independently of the PC, anything published on the Hawstead PC website (including minutes, HJ, history recorders report etc) needs to comply with GDPR with effect that any personal information included in those documents needs to have consent from named individuals.

The Council has sought to gain written consent from those individuals on the village email list – around 35 have now replied. Editors of the HJ/website have access to this list to see who has consented to their details appearing on the website/HJ. Where there is no consent then use of personal data should be avoided/redacted in these publications if they are to be posted onto the website.

As for the email list, it became apparent that this was considered to be a community resource rather than something just associated with the PC – indeed I have done nothing to gather details for this in the past. As such the original list will continue to be used by community groups, but not the PC, and those community groups will need to satisfy themselves that they have appropriate consent for this. I will circulate PC minutes etc to the smaller separate list of residents who have provided me with written consent.

Anyone can add themselves onto the PC email list in the future by filling out a consent form.

C Hibbert 19/7/18

### **Email dated 8 June 2018 to Councillors and volunteers who attended GDPR working party meeting on 7 June 2018**

*Dear All*

*Thanks for coming along last night and thanks to John for hosting.*

*GDPR affects the way the PC stores and processes personal information. The main areas affected seem to me to be the website, the HJ and the email list.*

#### **HJ**

*I am now clear in my mind that the HJ is run separately from the PC - the content of it is a matter for the editor, but that said if the PC want to publish it on its website, then it needs to make sure the content does not contain personal data or where it does that there is consent for that personal data to be processed in that way.*

*Quick solutions include minimizing the personal data in the content through use of first names only/ title ie chair of PC/churchwarden / initials rather than full detail. Failing that please check there is consent by reference to the central list of consents the PC holds. I will provide the icloud link to Judy/Andy in this regard and would ask them to return to me a signed data handling form for my file. Judy may have consents on her file from contributors which could be added. to the PC record.*

*In terms of the HJ being circulated by email - see comment below.*

#### Website

*This is a PC website - the PC pay for the platform and is required to do so in order to publish all the minutes and accounts, even though it is expertly administered by Andy who is not on the PC. After May 2018 personal data should not be published on it, except where there is consent. This stands even where such info is available in the public domain in any event. I will check any PC doc which I pass you for content. Judy has kindly agreed to reduce the level of personal info used in the HJ/ check there is consent. I think that broadly leaves the history recorder report which might contain personal info. As with the comments for the HJ above my suggestion would be to reduce the use of personal data/ supply partial personal info only - initials instead of names perhaps? the owner of... the chairman of... Where use of personal data is included, then please check the list of consent on the icloud before publishing/ seek explicit consent from the individual. If this does not appeal - the website could publish a redacted version, with the full copy including personal info available upon direct request to the history recorder without recourse to the PC?*

#### Email list

*I had understood the email list to be under the umbrella of the PC, given Henry's effort to increase its reach.. However given the comments last night and upon further reflection it appears that residents may feel that it is more properly a village resource rather than a PC list per se. Indeed I have done nothing myself to collate addresses - these have all been fed in from elsewhere - not entirely sure on what basis.*

*As such, might I suggest that the use of the existing list by Andy, Susanne, Judy etc continues as it is. It is up to these volunteers to feel comfortable that they have appropriate authority to use it/ comply with GDPR. I will no longer use the old list for circulating minute/agenda. Those continuing to use it should be clear that this list is nothing to do with the PC.*

*I will only use the smaller email group for which I have been acquiring documented consent for circulating PC material.*

*This will mean that there are two email groups on the go in the village, but I think perhaps that solution will enable me to make sure the PC is in compliance with its obligation as a public authority and won't prevent the various village groups from carrying on as they were, provided they feel comfortable. If for example the HCC feel it ought to be following the GDPR principles, then it can 'drop down' to the PC email list held by me instead for which we have a paper trail of explicit consent, but in the short term at least this will mean it loses a number of contacts.*

*My suggestions on the use of the email list are a departure from how we left matters last night, but I think upon reflection this might prove a more practical solution for everyone.*