

Risk Assessment

Workplace/Location: Ufford			Directorate: Ufford Parish Council			Date of assessment: 1 st June 2018		Review Date: 1 st June 2019			
Risk Assessors Name: Judi Hallett			Job title: Clerk to Ufford Parish Council			Risk Assessment For: Compliance with Data Protection Legislation					
DUTIES /TASK	HAZARDS IDENTIFIED	PEOPLE AT RISK				CONTROL MEASURES IN PLACE	RISK RATING				
		E	C	P	V		S	L	R	Risk Adequate	
Appointment of a Data Protection Officer	- DPO may not have correct expertise - DPO may not keep up with legislative changes	✓	✓	✓		(Clerk to be appointed as DPO – Voluntary appointment) - Clerk to attend all relevant training provided by SALC/LCPAS/ICO - Clerk to liaise directly with SALC/LCPAS on all queries	1	2	L	Maintain existing control measures.	
Subject Access Request (SAR)	- Not answered in time limits - Request not identified correctly - Request does not have sufficient information in it		✓	✓		- DPO to follow SAR Procedures - All potential issues reported to UPC and to subject submitting request	1	1	L	Maintain existing control measures.	
Data Breach	Personal data falls in to the hands of a third party	✓	✓	✓	✓	- Data Impact Assessment carried out - Hard copy data stored securely - Laptop password protected	2	1	L	Maintain existing control measures.	
Data Breach	Publishing of Personal Data in Minutes or on Web Site	✓	✓	✓	✓	- All Councillors to review minutes when in draft form - Avoid including any personal information in the minutes or other council documents which are in the public domain. Instead of naming a person, say 'a resident/member of the public unless necessary.	2	1	L	Maintain existing control measures	
Data Breach	Theft or loss of laptop containing personal data	✓	✓	✓	✓	- Password protect Laptop - Carry out regular back-ups of council data - Ensure safe disposal of IT equipment and printers at the end of their life - Ensure all new IT equipment has all security measures installed before use	2	1	L	Maintain existing control measures	
Data Breach	Theft or loss of Back-Up Memory Stick	✓	✓	✓	✓	Make all councillors (especially Chair) aware of the risk of theft or loss of devices and the need to take sensible measures to protect them from loss or theft	2	1	L	Maintain existing control measures	

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Data Breach	Unauthorised access to Council's e-mails	✓	✓	✓	✓	- Laptop and Mail Account Password known only to Clerk and regularly changed - Passwords changed following suspected breach - Anti-Virus/malware software kept up to date on laptop - Operating System up to date on Laptop	2	1	L	Maintain existing control measures
Web Site maintenance	Personal information or photographs published on Web Site	✓	✓	✓	✓	- Ensure access is password protected and limited to nominated people - Ensure that you have the written consent of the individual including parental consent if the subject is 17 or under)	2	2	M	Maintain existing control measures
Financial	Financial Loss following a Data Breach			✓		- Ensure that the council has liability cover which specifically covers prosecutions resulting from a data breach and put aside sufficient funds (up to 4% of income) should the council be fined for a data breach - Check insurance renewal each year	1	1	L	Maintain existing control measures
Financial	Budget for GDPR and Data Protection			✓		Ensure the Council has sufficient funds to meet the requirements of the new regulations both for equipment and data security and add to budget headings for the future	1	1	L	Maintain existing control measures
General Risks	Loss of third party data due to lack of understanding of the risks/need to protect it	✓	✓	✓	✓	Ensure that all staff and councillors have received adequate training and are aware of the risks	1	2	L	Maintain existing control measures
People at Risk Key: E = Employees, C = Customers, P = Public, V = Volunteers						Risk Rating: H = High, M = Medium, L = Low				

Adopted by Ufford Parish Council at its meeting on: 19th June 2018

Signed:

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 Judi Hallett
 Clerk to Ufford Parish Council

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 Cllr. Kathryn Jones
 Chair of Ufford Parish Council

Risk Ratings

SEVERITY (S)	
3	A fine greater than the PC's solvency and complete loss of reputation
2	A small fine and/or minor reputational damage
1	No financial impact and no reputational damage

LIKELIHOOD (L)	
5	It is expected to happen in most circumstances
4	Will probably occur at some time, or in most circumstances
3	Fairly likely to occur at some time, or in some circumstances
2	It is unlikely to, but could, occur at some time
1	May only occur in exceptional circumstances

Likelihood	5	5	10	15
	4	4	8	12
	3	3	6	9
	2	2	4	6
	1	1	2	3
	1	2	3	
	Severity			
		High Risk		
		Medium Risk		
		Low Risk		

RISK RATING (R)	ACTION REQUIRED
16+	Unacceptable risk do not proceed
9 -15	Requires Immediate action to reduce risk and maintain at an acceptable level
4 - 8	Precautions to be maintained and managed. Further action to reduce risk to be taken if this can be done cost effectively.
1 - 3	Precautions to be maintained and managed. Further action unlikely to be appropriate.