

Electoral Registration Officer for Dunbartonshire and Argyll & Bute

Policy statement and additional safeguards on processing special category data and personal data relating to criminal convictions and offences.

Introduction

Data Protection law requires controllers who process special category personal data, or personal data relating to criminal convictions and offences to have an appropriate policy document in place setting out a number of additional safeguards for this data.

This policy must:

- (a) explain the controller's procedures for securing compliance with the principles in Article 5 of the GDPR (principles relating to processing of personal data) in connection with the processing of personal data in reliance on the condition in question, and
- (b) explain the controller's policies as regards the retention and erasure of personal data processed in reliance on the condition, giving an indication of how long such personal data is likely to be retained."

This document is the policy adopted by the Electoral Registration Officer for Dunbartonshire and Argyll & Bute (ERO) in relation to this processing.

Policy Statement

1: Lawfulness, fairness and transparency:

All data flows into and out of the Electoral Registration Office have been assessed to determine the legal basis under which that data is processed and the results of the assessment are documented. I am satisfied that I have a legal basis for holding the personal data I hold, and that I also have a valid legal basis for disclosing this personal data to third parties where this happens. A copy of my privacy notice is available at www.saa.gov.uk/dab-vjb/privacy-notice I am presently updating my data processor agreements and data sharing agreements to reflect the new legal requirements.

2: Purpose limitation:

The purposes for which data are collected are clearly set out in my privacy notice. This includes reference to further use of data for internal management information purposes.

3: Data minimisation:

In assessing the data flows, I have also taken the opportunity to critically assess the need for each of the data fields in question and where superfluous data was being captured, I have now stopped capturing this.

4: Accuracy:

Data is checked for accuracy and, where any inaccuracies are discovered, these are promptly corrected and where appropriate any third party recipients of the inaccurate data notified of the correction.

5: Storage limitation:

The ERO only keeps personal information for the minimum period amount of time necessary. Sometimes this time period is set out in the law, but in most cases it is based on business need. I maintain a records retention and disposal schedule which sets out how long I hold different types of information for. You can view this at www.saa.gov.uk/dab-vjb/public-records-act

Ongoing management of the Electoral Registration records and information is subject to the provisions of a Records Management Plan, which was developed in terms of the Public Records (Scotland) Act 2011 and approved by the Keeper of the Records of Scotland. It is available online at www.saa.gov.uk/dab-vjb/public-records-act. The Records Management Plan sets out, in much greater detail, the provisions under which the ERO complies with his obligations under public records legislation, data protection and information security and is complementary to this policy statement.

6: Integrity and confidentiality:

The ERO has through Dunbartonshire and Argyll & Bute Valuation Joint Board an approved Information Security Policy which sets out roles and responsibilities within the organisation in relation to information security. All staff are required to take information security training and this is refreshed annually. My ICT systems have appropriate protective measures in place incorporating defence in depth and the systems are subject to external assessment and validation. I have policies and procedures in place to reduce the information security risks arising from use of hard copy documentation.