

PUBLICICA

Record of Processing Activities under Article 30 of the GDPR

Name and Contact Details of the Controller	Publica Group Limited Trinity Road, Cirencester Gloucestershire GL7 1PX
Name and Contact Details of the Data Protection Officer	Data Protection Officer (DPO) Publica Group Limited Trinity Road, Cirencester Gloucestershire GL7 1PX Tel: 01993 861194 Email: data.protection@publica.gov.uk
Background to Publica Group Limited	Publica Group Limited is a council owned employment company which delivers shared services (such as Housing, Council Tax, Planning Services, Environmental Waste) between Cotswold, West Oxfordshire and Forest of Dean District and Cheltenham Borough Councils. Publica Group Limited additionally provides services to the Cheltenham Trust, Cheltenham Borough Homes and UBICO (an environmental services local authority company).
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 our employees • promoting the services we provide • marketing our local tourism • carrying out health and public awareness campaigns • managing our property • providing leisure and cultural services • carrying out surveys • processing planning applications and appeals • managing planning enforcement • monitoring Section 106 agreements • management of landscaping • administering the assessment and collection of taxes and other revenue including benefits and grants • licensing and regulatory activities • local fraud initiatives • the provision of social services • crime prevention and prosecuting 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 provision of all non-commercial activities including refuse collections from residential properties • internal financial support and corporate functions • 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 for public safety , protection of life and property and traffic management • management of information technology systems • information and databank administration • public health • prevention and control of disease within the community • occupational health and welfare • produce and distribute printed material

	<ul style="list-style-type: none"> • management of public relations, journalism, advertising and 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>Publica Group Limited will only collate data where it has a valid lawful basis for processing that data. Publica 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>(a) Consent: <i>the individual has given clear consent for you to process their personal data for a specific purpose.</i></p> <p>(b) Contract: <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>(c) Legal obligation: <i>the processing is necessary for you to comply with the law (not including contractual obligations).</i></p> <p>(d) Vital interests: <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"> • residents • carers or parents of children • customers • suppliers • employees and persons contracted to provide a service (next of kin) • councillors • claimants • complainants, enquirers or their representatives • professional advisers and consultants • carers or representatives (this can include where we have written approval) • health professionals • 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 • consultation participants • objectors and supporters of planning proposal

Categories of Personal Data	<p>We process information relevant to the above /-purposes which may include:</p> <ul style="list-style-type: none">• name• date of birth• address• contact details• Household (and its usage) details• Lifestyle and social circumstances• national insurance number• Financial Details• Employment and education details• Housing needs• health records• passport details• driving license• CCTV• photographs• racial or ethnic information• trade union membership• religious / philosophical beliefs• sexual life / orientation• criminal convictions• Licenses or permits held• Business activities <p>We also process sensitive classes of information that may include:</p> <ul style="list-style-type: none">• Physical or mental health details• Racial of 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
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<p>Categories of Recipients to whom Personal Data may 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"> • members of the public • residents • customers or 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 • providers of goods and services • financial organisations • debt collection and tracing agencies • private investigators • service providers • local and central government • ombudsman and regulatory authorities • press and the media • consultants • courts and tribunals • trade unions • political organisations • professional advisors • credit reference agencies • professional bodies • survey and research organisations • emergency services • housing associations and landlords • voluntary and charitable organisations • religious organisations • data processors • regulatory bodies • courts and prison service • HM 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 and defence solicitors • police complaints authority • the disclosure and barring service • charities and not for profit partners
<p>Transfer of Personal Data to a Third Country and 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

Time Limits for Erasure	<p>Publica Group Limited 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 at: www.publicagroup.uk/privacy-notice/data-protection-act-overview/</p>
Technical and Organisational Security Measures (Article 32)	<p>Publica takes organisational security measures such as, but not limited to:</p> <ul style="list-style-type: none"> • encryption • pseudonymisation • anonymisation • BCP and resilience planning including backups • robust security updates including timely patching and anti-virus software • use access controls • physical security e.g. restricted access to site locations & clear desk policy • penetration testing • risk assessment • data protection impact assessments • staff training • contractual requirements
Privacy notices:	<p>Publica has published privacy notices for each service area that gathers personal data. More information relating to this can be found on Publica's website: www.publicagroup.uk/privacy-notice.aspx</p>

All Publica Group Limited contracts will require any data processor to also keep a record, in writing, of the above when it is processing data on behalf of Publica unless it is an enterprise or organisation that employs fewer than 250 people AND:

- the processing it carries out is unlikely to result in a risk to the rights and freedoms of data subjects.
- the processing is occasional; or
- the processing does not include special categories of data or personal data relating to criminal convictions and offences

Publica 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 written Record of Processing Activities shall be made available to the relevant supervisory authority on request.