

Record of Processing Activities as required by Article 30 of the General Data Protection Regulation and Section 61 of the Data Protection Bill

**Data Controller** The City of Edinburgh Council, Waverley Court, 4 East Market Street, Edinburgh, EH8 8BG  
**Named Data Protection Officer:** Kevin Wilbraham, Information Governance Manager  
**Contact Details:** E-mail: information.compliance@edinburgh.gov.uk Telephone: 0131 469 6200

**Date Updated:** 09/02/2021  
**Scheduled Date of Next Review:** 01/03/2022  
**Version Number:** 2

| Ref                                   | Purpose of Processing   | Description of Processing  | Format of Data                             | Categories of Data Subjects | Categories of Personal Data        | Does Processing include Special Categories of Personal Data?  | Lawfulness of Processing Condition | Disclosure and Transfer  |   | Processing Activities  |                               |   | Security and Disposal  |  |         |
|---------------------------------------|---|--|--|-----------------------------|------------------------------------|---|------------------------------------|--|---|--|-------------------------------|---|--|--|---------|
|                                       |   |  |  |                             |                                    |   |                                    | Categories of Recipients of Disclosure (if any)  | Destination of Transfer of Data (if any)  | Subject to Automated Decision Making   | 3rd Party Data Processor Used | Joint Data Controller (if any)  | Technical & Organisational Measures taken to Protect Personal Data   | Envisaged Time Limits for Erasure of Personal Information (See CEC Records Retention Schedule for further details)                             |         |
| <b>Section 1: Adult Care Services</b> |   |  |  |                             |                                    |   |                                    |  |   |  |                               |   |  |  |         |
| <b>Part 1: Asylum Seekers</b>         |   |  |  |                             |                                    |   |                                    |  |   |  |                               |   |  |  |         |
| 1.01.01                               | Provision of advice and support services to Asylum Seekers located within Edinburgh | Record of advice provided and of social work assessment of support needs and agreed support plan                     | ICT system: Swift<br>Paper based case file | Structured                  | Clients of Service                 | Name;<br>Date of Birth;<br>Address;<br>Contact Details;<br>Nationality;<br>Asylum Status;<br>Family Composition;<br>Health;<br>Support Needs                    | Yes                                | 6(1)(e) Official Authority vested in the controller (arising from various Adult Social Work legislation)<br><br>9(2)(h) Provision of social care | Name;<br>Address;<br>Contact Details;<br>Nationality;<br>Asylum Status;<br>Family Composition;<br>Health;<br>Support Needs                    | Other Statutory Agencies including NHS Lothian and Private and 3rd Sector Support Agencies involved in delivering support plan   | No                            | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None   | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 3 years |
| <b>Part 2: Carers</b>                 |   |  |  |                             |                                    |   |                                    |  |   |  |                               |   |  |  |         |
| 1.02.01                               | Provision of social work services to Adult Carers                                   | Record of assessments, advice and support provided to Adult Carers by the Social Work Services                       | ICT system: Swift<br>Paper based case file | Structured                  | Carers                             | Name;<br>Date of Birth;<br>Address;<br>Contact Details;<br>Family Composition;<br>Health;<br>Carers Assessment;<br>Support Needs                                | Yes                                | 6(1)(e) Official Authority vested in the controller (arising from various Adult Social Work legislation)<br><br>9(2)(h) Provision of social care | Name;<br>Address;<br>Contact Details;<br>Family Composition;<br>Health;<br>Carers Assessment;<br>Support Needs                                | Other Statutory Agencies including NHS Lothian and Private and 3rd Sector Support Agencies involved in delivering support plan and the Scottish Govt for the Carers Census | No                            | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | Service delivered by Edinburgh Health & Social Care Partnership.<br><br>Joint Data Controller is NHS Lothian | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 3 years |
| 1.02.02                               | Operation of Shared Lives Service (Adult Fostering)                                 | Record of assessment, advice and support provided to Adult Fostering carers and Adult Fostering Clients              | ICT system: Swift<br>Paper based case file | Structured                  | Carers and Adult Fostering Clients | Name;<br>Date of Birth;<br>Address;<br>Contact Details;<br>Family Composition;<br>Health;<br>Support Needs<br>Assessment;<br>Record of Social Work contacts     | Yes                                | 6(1)(e) Official Authority vested in the controller (arising from various Adult Social Work legislation)<br><br>9(2)(h) Provision of social care | Name;<br>Address;<br>Contact Details;<br>Family Composition;<br>Health;<br>Support Needs<br>Assessment;<br>Record of Social Work contacts     | Other Statutory Agencies including NHS Lothian and Private and 3rd Sector Support Agencies involved in delivering support plan   | No                            | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | Service delivered by Edinburgh Health & Social Care Partnership.<br><br>Joint Data Controller is NHS Lothian | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 3 years |
| <b>Part 3: Community Support</b>      |   |  |  |                             |                                    |   |                                    |  |   |  |                               |   |  |  |         |
| 1.03.01                               | Provision of Day Centre services for older and disabled clients                     | Record of day centre provision including maintenance of client social work records and all associated record keeping | ICT system: Swift<br>Paper based case file | Structured                  | Clients of Service                 | Name;<br>Date of Birth;<br>Address;<br>Contact Details;<br>Health Information;<br>Care / Support Plan;<br>Day Centre Records of Activities;<br>Incident Records | Yes                                | 6(1)(e) Official Authority vested in the controller (arising from various Adult Social Work legislation)<br><br>9(2)(h) Provision of social care | Name;<br>Address;<br>Contact Details;<br>Health Information;<br>Care / Support Plan;<br>Day Centre Records of Activities;<br>Incident Records | Other Statutory Agencies including NHS Lothian and Private and 3rd Sector Support Agencies involved in delivering support plan   | No                            | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | Service delivered by Edinburgh Health & Social Care Partnership.<br><br>Joint Data Controller is NHS Lothian | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 3 years |

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|------------------------------|--|--|--|------------|---|--|--|--|--|--|--|---|--|--|--|
|                              |  |  |  |            |   |  |  |  | Categories of Recipients of Disclosure (if any)  | Destination of Transfer of Data (if any)   | Subject to Automated Decision Making   | 3rd Party Data Processor Used   | Joint Data Controller (if any)   | Technical & Organisational Measures taken to Protect Personal Data   | Envisaged Time Limits for Erasure of Personal Information (See CEC Records Retention Schedule for further details) |
| 1.03.02                      | Recruitment of volunteers to work in the community                     | Volunteer application forms, interview and assessment paperwork, references and PVG paperwork                              | ICT system: Swift<br>Paper based case file | Structured | Volunteers and Prospective Volunteers                           | Name;<br>Date of Birth;<br>Address;<br>Contact Details;<br>Volunteer Application Form;<br>References;<br>PVG Membership (Criminal Record);<br>Health           | Yes  | 6(1)(e) Official Authority vested in the controller (arising from various Adult Social Work legislation)<br><br>9(2)(h) Provision of social care | None   | None   | No   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | Service delivered by Edinburgh Health & Social Care Partnership.<br><br>Joint Data Controller is NHS Lothian | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 3 years  |
| 1.04.03                      | Provision of Residential Care service for older and disabled clients   | Record of residential care provision including maintenance of client social work records and all associated record keeping | ICT system: Swift<br>Paper based case file | Structured | Clients of Service  | Name;<br>Date of Birth;<br>Address;<br>Contact Details;<br>Health Information;<br>Care / Support Plan;<br>Care Home Records of Activities;<br>Incident Records | Yes  | 6(1)(e) Official Authority vested in the controller (arising from various Adult Social Work legislation)<br><br>9(2)(h) Provision of social care | Name;<br>Address;<br>Contact Details;<br>Health Information;<br>Care / Support Plan;<br>Care Home Records of Activities;<br>Incident Records | Other Statutory Agencies including NHS Lothian and Private and 3rd Sector Support Agencies involved in delivering support plan | No   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | Service delivered by Edinburgh Health & Social Care Partnership.<br><br>Joint Data Controller is NHS Lothian | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 3 years  |
| 1.04.04                      | Provision of Adult Care at Home service for older and disabled clients | Record of Care at Home provision including maintenance of client social work records and all associated record keeping     | ICT system: Swift<br>Paper based case file | Structured | Clients of Service  | Name;<br>Date of Birth;<br>Address;<br>Contact Details;<br>Health Information;<br>Care / Support Plan;<br>Service Records of Activities;<br>Incident Records   | Yes  | 6(1)(e) Official Authority vested in the controller (arising from various Adult Social Work legislation)<br><br>9(2)(h) Provision of social care | Name;<br>Address;<br>Contact Details;<br>Health Information;<br>Care / Support Plan;<br>Service Records of Activities;<br>Incident Records   | Other Statutory Agencies including NHS Lothian and Private and 3rd Sector Support Agencies involved in delivering support plan | Not subject to automated decision making.<br><br>The council uses automation software for aspects of this processing | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | Service delivered by Edinburgh Health & Social Care Partnership.<br><br>Joint Data Controller is NHS Lothian | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 3 years  |
| <b>Part 5: Social Issues</b> |  |  |  |            |   |  |  |  |  |  |  |   |  |  |  |
| 1.05.01                      | Provision of Drug Advice and Support Services                          | Record of service provision including maintenance of client social work records and all associated record keeping          | ICT system: Swift<br>Paper based case file | Structured | Clients of Service  | Name;<br>Date of Birth;<br>Address;<br>Contact Details;<br>Health Information;<br>Records of Social Work Contacts;<br>Care Plan                                | Yes  | 6(1)(e) Official Authority vested in the controller (arising from various Adult Social Work legislation)<br><br>9(2)(h) Provision of social care | Name;<br>Address;<br>Contact Details;<br>Health Information;<br>Records of Social Work Contacts;<br>Care Plan                                | Other Statutory Agencies including NHS Lothian and Private and 3rd Sector Support Agencies involved in delivering support plan | No   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | Service delivered by Edinburgh Health & Social Care Partnership.<br><br>Joint Data Controller is NHS Lothian | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 3 years  |
| 1.05.02                      | Provision of Alcohol Advice and Support Services                       | Record of service provision including maintenance of client social work records and all associated record keeping          | ICT system: Swift<br>Paper based case file | Structured | Clients of Service  | Name;<br>Date of Birth;<br>Address;<br>Contact Details;<br>Health Information;<br>Records of Social Work Contacts;<br>Care Plan                                | Yes  | 6(1)(e) Official Authority vested in the controller (arising from various Adult Social Work legislation)<br><br>9(2)(h) Provision of social care | Name;<br>Address;<br>Contact Details;<br>Health Information;<br>Records of Social Work Contacts;<br>Care Plan                                | Other Statutory Agencies including NHS Lothian and Private and 3rd Sector Support Agencies involved in delivering support plan | No   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | Service delivered by Edinburgh Health & Social Care Partnership.<br><br>Joint Data Controller is NHS Lothian | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 3 years  |
| 1.05.03                      | Undertaking Drug Treatment & Testing Orders                            | Record of DTTO conditions and of treatment and testing undertaken.   | ICT system: Swift<br>Paper based case file | Structured | Individuals who are subject to a Drug Treatment & Testing order | Name;<br>Date of Birth;<br>Address;<br>Contact Details;<br>Health Information;<br>Drug Testing Results;<br>Records of Social Work Contacts;<br>Support Plan    | Yes  | 6(1)(c) Compliance with a legal obligation<br><br>Criminal Justice (Scotland) Act 2003<br><br>9(2)(h) Provision of social care                   | Name;<br>Address;<br>Contact Details;<br>Health Information;<br>Drug Testing Results;<br>Records of Social Work Contacts;<br>Support Plan    | Other Statutory Agencies including NHS Lothian and Scottish Court Service  | No   | Yes - Providers of ICT Services under CEC contract frameworks   | None   | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 3 years  |

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| <b>Part 6: Supporting Adults</b> |  |  |  |                             |   |   |                                    |  |   |  |  |   |  |  |         |
| 1.06.01                          | Provision of social work services for Adults in Edinburgh  | Maintenance of Social Work Records for Adult Social Work clients recording social work interventions and contacts with client. | ICT system: Swift<br>Paper based case file | Structured                  | Clients of Service                                  | Name;<br>Date of Birth;<br>Address;<br>Contact Details;<br>Social Background Information;<br>Health Information;<br>Records of Social Work Contacts;<br>Care Plan | Yes                                | 6(1)(e) Official Authority vested in the controller (arising from various Adult Social Work legislation)<br><br>9(2)(h) Provision of social care | Name;<br>Address;<br>Contact Details;<br>Social Background Information;<br>Health Information;<br>Records of Social Work Contacts;<br>Care Plan | Other Statutory Agencies including NHS Lothian and Private and 3rd Sector Support Agencies involved in delivering support plan | No   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | Service delivered by Edinburgh Health & Social Care Partnership.<br><br>Joint Data Controller is NHS Lothian | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 3 years |
| 1.06.02                          | Processing of Self Directed Support Payments   | Allocation and payment of self directed support payments for meeting social care needs   | ICT system: Swift<br>Paper based case file | Structured                  | People in receipt of Self Directed Support payments | Name;<br>Date of Birth;<br>Address;<br>Contact Details;<br>Care Plan;<br>Self Directed Payments Award;<br>Payment Details   | Yes                                | 6(1)(e) Official Authority vested in the controller (arising from various Adult Social Work legislation)<br><br>9(2)(h) Provision of social care | None  | None   | Not subject to automated decision making.<br><br>The council uses automation software for aspects of this processing | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | Service delivered by Edinburgh Health & Social Care Partnership.<br><br>Joint Data Controller is NHS Lothian | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 3 years |
| 1.06.03                          | Provision of Adult Protection Services   | Management of Multi Agency Public Protection Arrangements (MAPPA) for Adults who are identified as being in need of protection | ICT system: Swift<br>Paper based case file | Structured                  | Clients   | Name;<br>Date of Birth;<br>Address;<br>Contact Details;<br>Social Background Information;<br>MAPPA Assessment;<br>Records of Social Work Contacts;<br>Care Plan   | Yes                                | 6(1)(e) Official Authority vested in the controller (arising from various Adult Social Work legislation)<br><br>9(2)(h) Provision of social care | Name;<br>Address;<br>Contact Details;<br>Social Background Information;<br>MAPPA Assessment;<br>Records of Social Work Contacts;<br>Care Plan   | Other Statutory Agencies including NHS Lothian and Private and 3rd Sector Support Agencies involved in delivering support plan | No   | Yes - Providers of ICT Services under CEC contract frameworks   | None   | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 3 years |
| 1.06.04                          | Recording of Guardianship Orders in place for older people and clients with mental health issues | Recording of Guardianship Orders relevant to Social Work clients   | ICT system: Swift<br>Paper based case file | Structured                  | Clients of Service                                  | Name;<br>Date of Birth;<br>Address;<br>Contact Details;<br>Care Plan;<br>Guardianship Order Arrangements;<br>Payment Details                                      | Yes                                | 6(1)(e) Official Authority vested in the controller (arising from various Adult Social Work legislation)<br><br>9(2)(h) Provision of social care | Name;<br>Address;<br>Contact Details;<br>Care Plan;<br>Guardianship Order Arrangements;<br>Payment Details                                      | Office of the Public Guardian (OPG)  | No   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | Service delivered by Edinburgh Health & Social Care Partnership.<br><br>Joint Data Controller is NHS Lothian | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 3 years |
| 1.06.05                          | Provision of Blood Based Virus advice and support services                                       | Record of service provision including maintenance of client social work records and all associated record keeping              | ICT system: Swift<br>Paper based case file | Structured                  | Clients of Service                                  | Name;<br>Date of Birth;<br>Address;<br>Contact Details;<br>Health Information;<br>Records of Social Work Contacts;<br>Care Plan                                   | Yes                                | 6(1)(e) Official Authority vested in the controller<br><br>9(2)(h) Provision of social care  | Name;<br>Address;<br>Contact Details;<br>Health Information;<br>Records of Social Work Contacts;<br>Care Plan                                   | Other Statutory Agencies including NHS Lothian and Private and 3rd Sector Support Agencies involved in delivering support plan | No   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | Service delivered by Edinburgh Health & Social Care Partnership.<br><br>Joint Data Controller is NHS Lothian | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 3 years |

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|--|--|---|---|------------|-----------------------------|--|--|--|--|--|--------------------------------------|---|--------------------------------|--|--|
|  |  |   |   |            |                             |  |  |  | Categories of Recipients of Disclosure (if any)  | Destination of Transfer of Data (if any)   | Subject to Automated Decision Making | 3rd Party Data Processor Used   | Joint Data Controller (if any) | Technical & Organisational Measures taken to Protect Personal Data   | Envisaged Time Limits for Erasure of Personal Information (See CEC Records Retention Schedule for further details) |
| 1.06.06                                | Handling of Adult Social Work Complaints                                 | Receipt, investigation and resolution of complaints made about Adult Social Care services                         | ICT system: Swift<br>Paper based case file            | Structured | Complainants                | Name;<br>Date of Birth;<br>Address;<br>Contact Details;<br>Details of Complaint;<br>Complaint Investigation;<br>Complaint Conclusion                 | Yes  | 6(1)(e) Official Authority vested in the controller (arising from various Adult Social Work legislation)<br><br>9(2)(h) Provision of social care | None   | None   | No                                   | Yes - Providers of ICT Services under CEC contract frameworks   | None                           | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 2 years  |
| 1.06.07                                | Payment for Social Care Packages   | Record of payments made in respect of social care packages, including via direct payments where applicable.       | ICT system: Swift and Oracle<br>Paper based case file | Structured | Complainants                | Name;<br>Address;<br>Contact Details;<br>Package of care details including cost;<br>Payment information including bank account details where needed  | Yes  | 6(1)(e) Official Authority vested in the controller (arising from various Adult Social Work legislation)<br><br>9(2)(h) Provision of social care | None   | None   | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 2 years  |
| <b>Part 7: Supporting Disabilities</b> |  |   |   |            |                             |  |  |  |  |  |                                      |   |                                |  |  |
| 1.07.01                                | Provision of occupational therapy services and aids                      | Record of assessment of occupational therapy needs, care plan and aids to be provided                             | ICT system: Swift<br>Paper based case file            | Structured | Clients of Service          | Name;<br>Date of Birth;<br>Address;<br>Contact Details;<br>Health Information;<br>Records of Social Work Contacts;<br>Occupational Therapy Care Plan | Yes  | 6(1)(e) Official Authority vested in the controller (arising from various Adult Social Work legislation)<br><br>9(2)(h) Provision of social care | Name;<br>Address;<br>Contact Details;<br>Health Information;<br>Records of Social Work Contacts;<br>Occupational Therapy Care Plan | Other Statutory Agencies including NHS Lothian and 3rd Sector Support Agencies involved in delivering services and aids        | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 3 years  |
| 1.07.02                                | Provision of supported living services via SupportWorks Service          | Record of service provision including maintenance of client social work records and all associated record keeping | ICT system: Swift<br>Paper based case file            | Structured | Clients of Service          | Name;<br>Date of Birth;<br>Address;<br>Contact Details;<br>Health Information;<br>Records of Social Work Contacts;<br>Care Plan                      | Yes  | 6(1)(e) Official Authority vested in the controller (arising from various Adult Social Work legislation)<br><br>9(2)(h) Provision of social care | Name;<br>Address;<br>Contact Details;<br>Health Information;<br>Records of Social Work Contacts;<br>Care Plan                      | Other Statutory Agencies including NHS Lothian and Private and 3rd Sector Support Agencies involved in delivering support plan | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 3 years  |
| 1.07.03                                | Provision of advice and support to adults with communication impairments | Record of service provision including maintenance of client social work records and all associated record keeping | ICT system: Swift<br>Paper based case file            | Structured | Clients of Service          | Name;<br>Date of Birth;<br>Address;<br>Contact Details;<br>Health Information;<br>Records of Social Work Contacts;<br>Care Plan                      | Yes  | 6(1)(e) Official Authority vested in the controller (arising from various Adult Social Work legislation)<br><br>9(2)(h) Provision of social care | Name;<br>Address;<br>Contact Details;<br>Health Information;<br>Records of Social Work Contacts;<br>Care Plan                      | Other Statutory Agencies including NHS Lothian and Private and 3rd Sector Support Agencies involved in delivering support plan | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 3 years  |
| 1.07.04                                | Provision of advice and support to adults with learning disabilities     | Record of service provision including maintenance of client social work records and all associated record keeping | ICT system: Swift<br>Paper based case file            | Structured | Clients of Service          | Name;<br>Date of Birth;<br>Address;<br>Contact Details;<br>Health Information;<br>Records of Social Work Contacts;<br>Care Plan                      | Yes  | 6(1)(e) Official Authority vested in the controller (arising from various Adult Social Work legislation)<br><br>9(2)(h) Provision of social care | Name;<br>Address;<br>Contact Details;<br>Health Information;<br>Records of Social Work Contacts;<br>Care Plan                      | Other Statutory Agencies including NHS Lothian and Private and 3rd Sector Support Agencies involved in delivering support plan | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 3 years  |

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|  |   |   |  |                             |                             |   |                                    | Categories of Recipients of Disclosure (if any)   | Destination of Transfer of Data (if any)  | Subject to Automated Decision Making  | 3rd Party Data Processor Used | Joint Data Controller (if any)                                | Technical & Organisational Measures taken to Protect Personal Data | Envisaged Time Limits for Erasure of Personal Information (See CEC Records Retention Schedule for further details)                             |                                     |
| <b>Section 2: Children and Family Services</b> |   |   |  |                             |                             |   |                                    |   |   |   |                               |   |  |  |                                     |
| <b>Part 1: Adoption &amp; Fostering</b>        |   |   |  |                             |                             |   |                                    |   |   |   |                               |   |  |  |                                     |
| 2.01.01  | Appointment of members of the Fostering & Adoption Panel  | Application and appointment process for members of the Adoption and Fostering panel.  | ICT system: Swift<br>Paper based case file | Structured                  | Panel Members               | Name;<br>Date of Birth;<br>Address;<br>Contact Details;<br>Career History;<br>Educational Achievements;<br>Personal Statement;<br>References;<br>PVG Check  | Yes                                | 6(1)(e) Official Authority vested in the controller (arising from various Looked after Child legislation)<br><br>9(2)(h) Provision of social care | Name;<br>Address;<br>Contact Details;<br>Career History;<br>Educational Achievements;<br>Personal Statement;<br>References;<br>PVG Check  | Other Statutory Agencies including NHS Lothian and the Scottish Adoption Register. 3rd Sector Agencies involved in providing support and advice services. | No                            | Yes - Providers of ICT Services under CEC contract frameworks | None   | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 1 year following end of appointment |
| 2.01.02  | Record of enquiries from prospective adopters and foster carers which do not proceed to an application being made | Record of enquiries received from any person interesting in fostering and/or adoption who subsequently does not make an application for approval as a carer.                | ICT system: Swift<br>Paper based case file | Structured                  | Prospective Carers          | Name;<br>Date of Birth;<br>Address;<br>Contact Details;<br>Nature of Enquiry  | Yes                                | 6(1)(e) Official Authority vested in the controller (arising from various Looked after Child legislation)<br><br>9(2)(h) Provision of social care | Name;<br>Address;<br>Contact Details;<br>Nature of Enquiry  | Other Statutory Agencies including NHS Lothian and the Scottish Adoption Register. 3rd Sector Agencies involved in providing support and advice services. | No                            | Yes - Providers of ICT Services under CEC contract frameworks | None   | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 1 year                              |
| 2.01.03  | Record of enquiries from prospective adopters and foster carers which do not proceed beyond an initial interview. | Record of enquiries received from any person interesting in fostering and/or adoption who subsequently does not proceed with an application following an initial interview. | ICT system: Swift<br>Paper based case file | Structured                  | Prospective Carers          | Name;<br>Date of Birth;<br>Address;<br>Contact Details;<br>Record of Initial Interview;<br>Record of outcome of initial interview   | Yes                                | 6(1)(e) Official Authority vested in the controller (arising from various Looked after Child legislation)<br><br>9(2)(h) Provision of social care | Name;<br>Address;<br>Contact Details;<br>Record of Initial Interview;<br>Record of outcome of initial interview   | Other Statutory Agencies including NHS Lothian and the Scottish Adoption Register. 3rd Sector Agencies involved in providing support and advice services. | No                            | Yes - Providers of ICT Services under CEC contract frameworks | None   | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 1 year or 10 years                  |
| 2.01.04  | Application for Approval as Adopter or Foster Carer which is unsuccessful   | Record of application made for approval as a foster carer or adopter which is unsuccessful.   | ICT system: Swift<br>Paper based case file | Structured                  | Prospective Carers          | Name;<br>Date of Birth;<br>Address;<br>Contact Details;<br>Form 10 Assessment Report;<br>References;<br>Health Checks;<br>PVG Check;<br>Financial Information;<br>Outcome of Approval Application | Yes                                | 6(1)(e) Official Authority vested in the controller (arising from various Looked after Child legislation)<br><br>9(2)(h) Provision of social care | Name;<br>Address;<br>Contact Details;<br>Form 10 Assessment Report;<br>References;<br>Health Checks;<br>PVG Check;<br>Financial Information;<br>Outcome of Approval Application | Other Statutory Agencies including NHS Lothian and the Scottish Adoption Register. 3rd Sector Agencies involved in providing support and advice services. | No                            | Yes - Providers of ICT Services under CEC contract frameworks | None   | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 25 years                            |

Record of Processing Activities as required by Article 30 of the General Data Protection Regulation and Section 61 of the Data Protection Bill

**Data Controller** The City of Edinburgh Council, Waverley Court, 4 East Market Street, Edinburgh, EH8 8BG  
**Named Data Protection Officer:** Kevin Wilbraham, Information Governance Manager  
**Contact Details:** E-mail: information.compliance@edinburgh.gov.uk Telephone: 0131 469 6200

**Date Updated:** 09/02/2021  
**Scheduled Date of Next Review:** 01/03/2022  
**Version Number:** 2

| Ref     | Purpose of Processing   | Description of Processing  | Format of Data                             |            | Categories of Data Subjects        | Categories of Personal Data   | Does Processing include Special Categories of Personal Data? | Lawfulness of Processing Condition  | Disclosure and Transfer   |   | Processing Activities  |   |                                | Security and Disposal  |  |
|---------|---|--|--|------------|------------------------------------|---|--|---|---|---|--|---|--------------------------------|--|--|
|         |   |  |  |            |                                    |   |  |   | Categories of Recipients of Disclosure (if any)   | Destination of Transfer of Data (if any)  | Subject to Automated Decision Making   | 3rd Party Data Processor Used   | Joint Data Controller (if any) | Technical & Organisational Measures taken to Protect Personal Data   | Envisaged Time Limits for Erasure of Personal Information (See CEC Records Retention Schedule for further details) |
| 2.01.05 | Maintenance of Records for approved Foster Carers including supervision records and fee payment records | Social Work records pertaining to approved Foster Carers including details of family and household composition, previous and current placements, supervision and assessments, observation records, concerns / complaints records and fee payment records | ICT system: Swift<br>Paper based case file | Structured | Foster Carers                      | Name;<br>Date of Birth;<br>Address;<br>Contact Details;<br>Form 10 Assessment Report;<br>References;<br>Health Checks;<br>PVG Check;<br>Financial Information;<br>Outcome of Approval Application;<br>Record of Placements made;<br>Supervision / Support Notes;<br>Monitoring & Appraisal records;<br>Training Records | Yes  | 6(1)(e) Official Authority vested in the controller (arising from various Looked after Child legislation)<br><br>9(2)(h) Provision of social care | Name;<br>Address;<br>Contact Details;<br>Form 10 Assessment Report;<br>References;<br>Health Checks;<br>PVG Check;<br>Financial Information;<br>Outcome of Approval Application;<br>Record of Placements made;<br>Supervision / Support Notes;<br>Monitoring & Appraisal records;<br>Training Records | Other Statutory Agencies including NHS Lothian and the Scottish Adoption Register. 3rd Sector Agencies involved in providing support and advice services. | Not subject to automated decision making.<br><br>The council uses automation software for aspects of this processing | Yes - Providers of ICT Services under CEC contract frameworks   | None                           | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 25 years   |
| 2.01.06 | Record of approval of adopters who subsequently progress to adopt.                                      | Record of application made for approval as a foster carer or adopter which is successful and for whom a match is made.   | ICT system: Swift<br>Paper based case file | Structured | Adoptive Parents                   | Name;<br>Date of Birth;<br>Address;<br>Contact Details;<br>Form 10 Assessment Report;<br>References;<br>Health Checks;<br>PVG Check;<br>Financial Information;<br>Outcome of Approval Application   | Yes  | 6(1)(e) Official Authority vested in the controller (arising from various Looked after Child legislation)<br><br>9(2)(h) Provision of social care | Name;<br>Address;<br>Contact Details;<br>Form 10 Assessment Report;<br>References;<br>Health Checks;<br>PVG Check;<br>Financial Information;<br>Outcome of Approval Application   | Other Statutory Agencies including NHS Lothian and the Scottish Adoption Register. 3rd Sector Agencies involved in providing support and advice services. | No   | Yes - Providers of ICT Services under CEC contract frameworks   | None                           | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 100 years  |
| 2.01.07 | Maintenance of Records of Private Fostering Arrangements  | Records of private fostering arrangements made between a person with parental responsibility and another person or people.   | ICT system: Swift                          | Structured | Private Foster Carers and Children | Name;<br>Date of Birth;<br>Address;<br>Contact Details;<br>Assessment details;<br>References;<br>Health Checks;<br>PVG Check;<br>Placements details;  | Yes  | 6(1)(e) Official Authority vested in the controller (arising from various Looked after Child legislation)<br><br>9(2)(h) Provision of social care | Name;<br>Address;<br>Contact Details;<br>Assessment details;<br>References;<br>Health Checks;<br>PVG Check;<br>Placements details;  | Other Statutory Agencies including NHS Lothian and the Scottish Adoption Register. 3rd Sector Agencies involved in providing support and advice services. | No   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 5 years  |
| 2.01.08 | Maintenance of Social Work records for looked after children  | Social Work records pertaining to social work involvement in child's life.   | ICT system: Swift<br>Paper based case file | Structured | Clients                            | Name;<br>Date of Birth;<br>Address;<br>Contact Details;<br>Social Background Information;<br>Health Information;<br>Records of Social Work Contacts;<br>Care Plan   | Yes  | 6(1)(e) Official Authority vested in the controller (arising from various Looked after Child legislation)<br><br>9(2)(h) Provision of social care | Name;<br>Address;<br>Contact Details;<br>Social Background Information;<br>Health Information;<br>Records of Social Work Contacts;<br>Care Plan   | Other Statutory Agencies including NHS Lothian and the Scottish Adoption Register. 3rd Sector Agencies involved in providing support and advice services. | Not subject to automated decision making.<br><br>The council uses automation software for aspects of this processing | Yes - Providers of ICT Services under CEC contract frameworks   | None                           | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 100 years  |

Record of Processing Activities as required by Article 30 of the General Data Protection Regulation and Section 61 of the Data Protection Bill

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**Date Updated:** 09/02/2021  
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|---|--|---|--|------------|--|--|--|---|--|---|--------------------------------------|---|--------------------------------|--|--|
|   |  |   |  |            |  |  |  |   | Categories of Recipients of Disclosure (if any)  | Destination of Transfer of Data (if any)  | Subject to Automated Decision Making | 3rd Party Data Processor Used   | Joint Data Controller (if any) | Technical & Organisational Measures taken to Protect Personal Data   | Envisaged Time Limits for Erasure of Personal Information (See CEC Records Retention Schedule for further details) |
| 2.01.09   | Maintenance of Social Work records for children who have been adopted                                    | Social Work records pertaining to social work involvement in child's life.  | ICT system: Swift<br>Paper based case file | Structured | Clients  | Name;<br>Date of Birth;<br>Address;<br>Contact Details;<br>Social Background Information;<br>Health Information;<br>Records of Social Work Contacts;<br>Care Plan  | Yes  | 6(1)(e) Official Authority vested in the controller (arising from various Looked after Child legislation)<br><br>9(2)(h) Provision of social care | Name;<br>Address;<br>Contact Details;<br>Social Background Information;<br>Health Information;<br>Records of Social Work Contacts;<br>Care Plan  | Other Statutory Agencies including NHS Lothian and the Scottish Adoption Register. 3rd Sector Agencies involved in providing support and advice services. | No                                   | Yes - Providers of ICT Services under CEC contract frameworks   | None                           | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 100 years  |
| 2.01.10   | Operation of birth family contact] service for adopted children  | Social Work records pertaining to social work involvement in facilitating contact between an adopted child and their birth parents.                                       | ICT system: Swift<br>Paper based case file | Structured | Clients  | Name;<br>Date of Birth;<br>Address;<br>Contact Details;<br>Social Background Information;<br>Record of contact;  | Yes  | 6(1)(e) Official Authority vested in the controller (arising from various Looked after Child legislation)<br><br>9(2)(h) Provision of social care | Name;<br>Date of Birth;<br>Address;<br>Contact Details;<br>Social Background Information;<br>Record of contact;  | Other Statutory Agencies including NHS Lothian and the Scottish Adoption Register. 3rd Sector Agencies involved in providing support and advice services. | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 100 years  |
| <b>Part 2: Child Protection</b>   |  |   |  |            |  |  |  |   |  |   |                                      |   |                                |  |  |
| 2.02.01   | Child protection investigation which results in child not being placed on the Child Protection Register. | Social work records pertaining to investigation undertaken into a child protection incident which results in the child being placed on the Child Protection register.     | ICT system: Swift<br>Paper based case file | Structured | Children;<br>Families and other Relevant People;<br>Professionals working with the Child | Name;<br>Date of Birth;<br>Address;<br>Contact Details;<br>Social Background Information;<br>Family composition;<br>Child Protection Investigation details;<br>Records of Social Work Contacts;<br>Care Plan | Yes  | 6(1)(e) Official Authority vested in the controller (arising from various Child Protection legislation)<br><br>9(2)(h) Provision of social care   | Name;<br>Date of Birth;<br>Address;<br>Contact Details;<br>Social Background Information;<br>Family composition;<br>Child Protection Investigation details;<br>Records of Social Work Contacts;<br>Care Plan | Other Statutory Agencies including NHS Lothian and Police Scotland and 3rd Sector Support Agencies involved in delivering services and aids               | No                                   | Yes - Providers of ICT Services under CEC contract frameworks   | None                           | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 35 years   |
| 2.02.02   | Child protection investigation which results in child being placed on the Child Protection Register.     | Social work records pertaining to investigation undertaken into a child protection incident which results in the child not being placed on the Child Protection register. | ICT system: Swift<br>Paper based case file | Structured | Children;<br>Families and other Relevant People;<br>Professionals working with the Child | Name;<br>Date of Birth;<br>Address;<br>Contact Details;<br>Social Background Information;<br>Family composition;<br>Child Protection Investigation details;<br>Records of Social Work Contacts;<br>Care Plan | Yes  | 6(1)(e) Official Authority vested in the controller (arising from various Child Protection legislation)<br><br>9(2)(h) Provision of social care   | Name;<br>Date of Birth;<br>Address;<br>Contact Details;<br>Social Background Information;<br>Family composition;<br>Child Protection Investigation details;<br>Records of Social Work Contacts;<br>Care Plan | Other Statutory Agencies including NHS Lothian and Police Scotland and 3rd Sector Support Agencies involved in delivering services and aids               | No                                   | Yes - Providers of ICT Services under CEC contract frameworks   | None                           | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 5 Years  |
| <b>Part 3: Child Minding</b>  |  |   |  |            |  |  |  |   |  |   |                                      |   |                                |  |  |
| No processing of personal data takes place under this category of activity. |  |   |  |            |  |  |  |   |  |   |                                      |   |                                |  |  |
| <b>Part 4: Looked After Children</b>  |  |   |  |            |  |  |  |   |  |   |                                      |   |                                |  |  |

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|---------|---|--|--|------------|--|---|--|--|---|---|--------------------------------------|---|--------------------------------|--|--|
|         |   |  |  |            |  |   |  |  | Categories of Recipients of Disclosure (if any)   | Destination of Transfer of Data (if any)  | Subject to Automated Decision Making | 3rd Party Data Processor Used   | Joint Data Controller (if any) | Technical & Organisational Measures taken to Protect Personal Data   | Envisaged Time Limits for Erasure of Personal Information (See CEC Records Retention Schedule for further details) |
| 2.04.01 | Provision of social work services for Looked after Children in Edinburgh  | Maintenance of Social Work Records for Looked after Children Social Work clients recording social work interventions and contacts with client. | ICT system: Swift<br>Paper based case file | Structured | Looked after Children; Family / Household members of child | Name; Date of Birth; Address; Contact Details; Social Background Information; Family composition; Health Information; Records of Social Work Contacts; Care Plan                                      | Yes  | 6(1)(e) Official Authority vested in the controller (arising from various Looked After Children Social Work legislation)<br>9(2)(h) Provision of social care | Name; Address; Contact Details; Social Background Information; Health Information; Records of Social Work Contacts; Care Plan   | Other Statutory Agencies including Scottish Children's Reporter Administration (SCRA) and NHS Lothian and 3rd Sector Support Agencies involved in delivering social work services | No                                   | Yes - Providers of ICT Services under CEC contract frameworks   | None                           | ICT System Access Controls and ICT Security Protocols applied.<br>Hard copy files securely stored and access restricted to relevant staff. | 100 years  |
| 2.04.02 | Provision of Through Care and After Care support and advice services for Looked after Children in Edinburgh       | Maintenance of records of through care and after care advice and support provided to Looked after Children                                     | ICT system: Swift<br>Paper based case file | Structured | Looked after Children                                      | Name; Date of Birth; Address; Contact Details; Social Background Information; Family composition; Health Information; Records of Social Work Contacts; Support & Care Plan; Record of advice provided | Yes  | 6(1)(e) Official Authority vested in the controller (arising from various Looked After Children Social Work legislation)<br>9(2)(h) Provision of social care | Name; Date of Birth; Address; Contact Details; Social Background Information; Family composition; Health Information; Records of Social Work Contacts; Support & Care Plan; Record of advice provided | Other Statutory Agencies including NHS Lothian and DWP and 3rd Sector Support Agencies involved in delivering support plan  | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br>Hard copy files securely stored and access restricted to relevant staff. | 100 years  |
| 2.04.03 | Provision of Children's Rights advice to Looked after Children  | Maintenance of records of through care and after care advice and support provided to Looked after Children                                     | ICT system: Swift<br>Paper based case file | Structured | Looked after Children                                      | Name; Date of Birth; Address; Contact Details; Social Background Information; Views of the child; Record of advice and representation provided  | Yes  | 6(1)(e) Official Authority vested in the controller (arising from various Looked After Children Social Work legislation)<br>9(2)(h) Provision of social care | Name; Date of Birth; Address; Contact Details; Social Background Information; Views of the child; Record of advice and representation provided  | Other Statutory Agencies including NHS Lothian and 3rd Sector Support Agencies which support the child or with whom the Children's Rights service represents the child's views.   | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br>Hard copy files securely stored and access restricted to relevant staff. | 100 years  |
| 2.04.04 | Managing Child Trust Fund Accounts on behalf of looked after and accommodated children born between 2002 and 2010 | Maintenance of records relating to the management of Child Trust Fund Accounts on behalf of looked after and accommodated children             | ICT system: Swift<br>Paper based case file | Structured | Looked after and Accommodated Children                     | Name; Date of Birth; Address; Contact Details; Child Trust Fund Account details   | Yes  | 6(1)(e) Official Authority vested in the controller (arising from various Looked After Children Social Work legislation)<br>9(2)(h) Provision of social care | None  | None  | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br>Hard copy files securely stored and access restricted to relevant staff. | 6 years  |



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|---|--|---|--|------------|--|---|--|--|---|---|--------------------------------------|---|--------------------------------|--|--|
|   |  |   |  |            |  |   |  |  | Categories of Recipients of Disclosure (if any)   | Destination of Transfer of Data (if any)  | Subject to Automated Decision Making | 3rd Party Data Processor Used   | Joint Data Controller (if any) | Technical & Organisational Measures taken to Protect Personal Data   | Envisaged Time Limits for Erasure of Personal Information (See CEC Records Retention Schedule for further details) |
| 2.04.05   | Registration of Looked After and Accommodated Children with the Scottish Book Trust for the Dolly Parton Imagination Library project | Registration of children's name, age and address so that they are sent one book per month until they are aged 5.            | ICT system: Swift<br>Paper based case file | Structured | Looked after and Accommodated Children | Name;<br>Date of Birth;<br>Mailing Address  | No   | 6(1)(e) Official Authority vested in the controller (arising from various Looked After Children Social Work legislation)<br><br>9(2)(h) Provision of social care | Name;<br>Date of Birth;<br>Mailing Address  | Scottish Book Trust and the Dolly Parton Imagination Library  | No                                   | Yes - the Scottish Book Trust and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 3 years  |
| <b>Part 5: Communications</b>   |  |   |  |            |  |   |  |  |   |   |                                      |   |                                |  |  |
| No processing of personal data takes place under this category of activity. |  |   |  |            |  |   |  |  |   |   |                                      |   |                                |  |  |
| <b>Part 6: Programme management and development</b>                         |  |   |  |            |  |   |  |  |   |   |                                      |   |                                |  |  |
| No processing of personal data takes place under this category of activity. |  |   |  |            |  |   |  |  |   |   |                                      |   |                                |  |  |
| <b>Part 7: Residential Homes</b>  |  |   |  |            |  |   |  |  |   |   |                                      |   |                                |  |  |
| 2.07.01   | Maintenance of case files for children looked after in City of Edinburgh Council Care Homes  | Record of residential care provision including maintenance of child's social work records and all associated record keeping | ICT system: Swift<br>Paper based case file | Structured | Children who live in residential homes | Name;<br>Date of Birth;<br>Address;<br>Contact Details;<br>Health Information;<br>Care / Support Plan;<br>Residential Home Records of Activities;<br>Incident Records | Yes  | 6(1)(e) Official Authority vested in the controller (arising from various Looked After Children Social Work legislation)<br><br>9(2)(h) Provision of social care | Name;<br>Date of Birth;<br>Address;<br>Contact Details;<br>Health Information;<br>Care / Support Plan;<br>Residential Home Records of Activities;<br>Incident Records | Other Statutory Agencies including Scottish Children's Reporter Administration (SCRA) and NHS Lothian and 3rd Sector Support Agencies involved in delivering social work services | No                                   | Yes - Providers of ICT Services under CEC contract frameworks                             | None                           | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 100 years  |
| 2.07.02   | Maintenance of daily diaries in residential care homes   | Record of daily activities and incidents in each residential care home  | ICT system: Swift<br>Paper based case file | Structured | Children who live in residential homes | Name;<br>Residential Home Records of Activities;<br>Incident Records  | Yes  | 6(1)(e) Official Authority vested in the controller (arising from various Looked After Children Social Work legislation)<br><br>9(2)(h) Provision of social care | Name;<br>Residential Home Records of Activities;<br>Incident Records  | Other Statutory Agencies including Scottish Children's Reporter Administration (SCRA) and NHS Lothian and 3rd Sector Support Agencies involved in delivering social work services | No                                   | Yes - Providers of ICT Services under CEC contract frameworks                             | None                           | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 3 years  |
| 2.07.03   | Maintenance of significant incidents records where a child is named within the report  | Significant incidents reports are prepared after any incident occurring in a residential home deemed to be of significance. | ICT system: Swift<br>Paper based case file | Structured | Children who live in residential homes | Name;<br>Date of Birth;<br>Address;<br>Contact Details;<br>Significant Incident Records   | Yes  | 6(1)(e) Official Authority vested in the controller (arising from various Looked After Children Social Work legislation)<br><br>9(2)(h) Provision of social care | Name;<br>Date of Birth;<br>Address;<br>Contact Details;<br>Significant Incident Records   | Other Statutory Agencies including Scottish Children's Reporter Administration (SCRA) and NHS Lothian and 3rd Sector Support Agencies involved in delivering social work services | No                                   | Yes - Providers of ICT Services under CEC contract frameworks                             | None                           | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 100 years  |

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|--|--|--|--|-------------|--|--|--|---|--|---|--|---|--------------------------------|--|--|
|  |  |  |  |             |  |  |  |   | Categories of Recipients of Disclosure (if any)  | Destination of Transfer of Data (if any)  | Subject to Automated Decision Making   | 3rd Party Data Processor Used                                 | Joint Data Controller (if any) | Technical & Organisational Measures taken to Protect Personal Data   | Envisaged Time Limits for Erasure of Personal Information (See CEC Records Retention Schedule for further details) |
| 2.07.04  | Maintenance of visitor book within Residential home  | Record of daily visitors to residential care home  | ICT system: Swift<br>Paper based case file | Structured; | Children who live in residential homes;<br>Visitors to Residential Home                  | Name;<br>Job Title;<br>Purpose of visit  | No   | 6(1)(e) Official Authority vested in the controller (arising from various Looked After Children Social Work legislation)                              | None   | None  | No   | Yes - Providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 3 years  |
| <b>Part 8: Social Issues</b>   |  |  |  |             |  |  |  |   |  |   |  |   |                                |  |  |
| No processing of personal data takes place under this category of activity.                        |  |  |  |             |  |  |  |   |  |   |  |   |                                |  |  |
| <b>Part 9: Special Education</b>   |  |  |  |             |  |  |  |   |  |   |  |   |                                |  |  |
| See Section 10: Education for personal data processing undertaken under this category of activity. |  |  |  |             |  |  |  |   |  |   |  |   |                                |  |  |
| <b>Part 10: Supporting Children</b>  |  |  |  |             |  |  |  |   |  |   |  |   |                                |  |  |
| 2.10.01  | Maintenance of social work case file for children receiving a service in a Child & Family Centre or Early Years Centre | Maintenance of Social Work Records recording social work interventions and contacts with client. | ICT system: Swift<br>Paper based case file | Structured  | Children;<br>Families and other Relevant People;<br>Professionals working with the Child | Name;<br>Date of Birth;<br>Address;<br>Contact Details;<br>Social Background Information;<br>Family composition;<br>Health Information;<br>Records of Social Work Contacts;<br>Care Plan | Yes  | 6(1)(e) Official Authority vested in the controller (arising from various Children's Social Work legislation)<br><br>9(2)(h) Provision of social care | Name;<br>Date of Birth;<br>Address;<br>Contact Details;<br>Social Background Information;<br>Family composition;<br>Health Information;<br>Records of Social Work Contacts;<br>Care Plan | Other Statutory Agencies including Scottish Children's Reporter Administration (SCRA) and NHS Lothian and 3rd Sector Support Agencies involved in delivering social work services | Not subject to automated decision making.<br><br>The council uses automation software for aspects of this processing | Yes - Providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 20 years   |
| 2.10.02  | Maintenance of social work case file for a child looked after at home or subject to a home supervision order           | Maintenance of Social Work Records recording social work interventions and contacts with client. | ICT system: Swift<br>Paper based case file | Structured  | Children;<br>Families and other Relevant People;<br>Professionals working with the Child | Name;<br>Date of Birth;<br>Address;<br>Contact Details;<br>Social Background Information;<br>Family composition;<br>Health Information;<br>Records of Social Work Contacts;<br>Care Plan | Yes  | 6(1)(e) Official Authority vested in the controller (arising from various Children's Social Work legislation)<br><br>9(2)(h) Provision of social care | Name;<br>Date of Birth;<br>Address;<br>Contact Details;<br>Social Background Information;<br>Family composition;<br>Health Information;<br>Records of Social Work Contacts;<br>Care Plan | Other Statutory Agencies including Scottish Children's Reporter Administration (SCRA) and NHS Lothian and 3rd Sector Support Agencies involved in delivering social work services | Not subject to automated decision making.<br><br>The council uses automation software for aspects of this processing | Yes - Providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 48 years   |
| 2.10.03  | Maintenance of social work case file for a child reporting missing who does not already have a social work file        | Maintenance of Social Work Records recording social work interventions and contacts with client. | ICT system: Swift<br>Paper based case file | Structured  | Children;<br>Families and other Relevant People;<br>Professionals working with the Child | Name;<br>Date of Birth;<br>Address;<br>Contact Details;<br>Social Background Information;<br>Family composition;<br>Health Information;<br>Records of Social Work Contacts;<br>Care Plan | Yes  | 6(1)(e) Official Authority vested in the controller (arising from various Children's Social Work legislation)<br><br>9(2)(h) Provision of social care | Name;<br>Date of Birth;<br>Address;<br>Contact Details;<br>Social Background Information;<br>Family composition;<br>Health Information;<br>Records of Social Work Contacts;<br>Care Plan | Other Statutory Agencies including Scottish Children's Reporter Administration (SCRA) and NHS Lothian and 3rd Sector Support Agencies involved in delivering social work services | Not subject to automated decision making.<br><br>The council uses automation software for aspects of this processing | Yes - Providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 2 years  |

Record of Processing Activities as required by Article 30 of the General Data Protection Regulation and Section 61 of the Data Protection Bill

**Data Controller** The City of Edinburgh Council, Waverley Court, 4 East Market Street, Edinburgh, EH8 8BG  
**Named Data Protection Officer:** Kevin Wilbraham, Information Governance Manager  
**Contact Details:** E-mail: information.compliance@edinburgh.gov.uk Telephone: 0131 469 6200

**Date Updated:** 09/02/2021  
**Scheduled Date of Next Review:** 01/03/2022  
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| Ref   | Purpose of Processing   | Description of Processing  | Format of Data                             |            | Categories of Data Subjects  | Categories of Personal Data  | Does Processing include Special Categories of Personal Data? | Lawfulness of Processing Condition  | Disclosure and Transfer  |   | Processing Activities  |   |                                | Security and Disposal  |  |
|---|---|--|--|------------|--|--|--|---|--|---|--|---|--------------------------------|--|--|
|   |   |  |  |            |  |  |  |   | Categories of Recipients of Disclosure (if any)  | Destination of Transfer of Data (if any)  | Subject to Automated Decision Making   | 3rd Party Data Processor Used   | Joint Data Controller (if any) | Technical & Organisational Measures taken to Protect Personal Data   | Envisaged Time Limits for Erasure of Personal Information (See CEC Records Retention Schedule for further details) |
| 2.10.04   | Maintenance of records of children for whom alive and assistance is offered without any extensive social work contact being maintained. | Maintenance of Social Work Records recording social work interventions and contacts with client. | ICT system: Swift<br>Paper based case file | Structured | Children;<br>Families and other Relevant People;<br>Professionals working with the Child | Name;<br>Date of Birth;<br>Address;<br>Contact Details;<br>Social Background Information;<br>Family composition;<br>Health Information;<br>Records of Social Work Contacts;<br>Care Plan | Yes  | 6(1)(e) Official Authority vested in the controller (arising from various Children's Social Work legislation)<br><br>9(2)(h) Provision of social care | Name;<br>Date of Birth;<br>Address;<br>Contact Details;<br>Social Background Information;<br>Family composition;<br>Health Information;<br>Records of Social Work Contacts;<br>Care Plan | Other Statutory Agencies including Scottish Children's Reporter Administration (SCRA) and NHS Lothian and 3rd Sector Support Agencies involved in delivering social work services | Not subject to automated decision making.<br><br>The council uses automation software for aspects of this processing | Yes - Providers of ICT Services under CEC contract frameworks   | None                           | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 1 year   |
| 2.10.05   | Provision of social work services for young carers  | Maintenance of Social Work Records recording social work interventions and contacts with client. | ICT system: Swift<br>Paper based case file | Structured | Children;<br>Families and other Relevant People;<br>Professionals working with the Child | Name;<br>Date of Birth;<br>Address;<br>Contact Details;<br>Social Background Information;<br>Family composition;<br>Health Information;<br>Records of Social Work Contacts;<br>Care Plan | Yes  | 6(1)(e) Official Authority vested in the controller (arising from various Children's Social Work legislation)<br><br>9(2)(h) Provision of social care | Name;<br>Date of Birth;<br>Address;<br>Contact Details;<br>Social Background Information;<br>Family composition;<br>Health Information;<br>Records of Social Work Contacts;<br>Care Plan | Other Statutory Agencies including Scottish Government and NHS Lothian and 3rd Sector Support Agencies involved in delivering social work services                                | No   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 1 year   |
| <b>Part 11: Supporting disabilities</b>                                     |   |  |  |            |  |  |  |   |  |   |  |   |                                |  |  |
| 2.11.01   | Maintenance of social work case file for children receiving a service from the Children with Disabilities Social Work Team              | Maintenance of Social Work Records recording social work interventions and contacts with client. | ICT system: Swift<br>Paper based case file | Structured | Children;<br>Families and other Relevant People;<br>Professionals working with the Child | Name;<br>Date of Birth;<br>Address;<br>Contact Details;<br>Social Background Information;<br>Family composition;<br>Health Information;<br>Records of Social Work Contacts;<br>Care Plan | Yes  | 6(1)(e) Official Authority vested in the controller (arising from various Children's Social Work legislation)<br><br>9(2)(h) Provision of social care | Name;<br>Date of Birth;<br>Address;<br>Contact Details;<br>Social Background Information;<br>Family composition;<br>Health Information;<br>Records of Social Work Contacts;<br>Care Plan | Other Statutory Agencies including Scottish Children's Reporter Administration (SCRA) and NHS Lothian and 3rd Sector Support Agencies involved in delivering social work services | No   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 100 years  |
| 2.11.02   | Provision of occupational therapy services and aids   | Record of assessment of occupational therapy needs, care plan and aids to be provided            | ICT system: Swift<br>Paper based case file | Structured | Clients of Service   | Name;<br>Date of Birth;<br>Address;<br>Contact Details;<br>Health Information;<br>Records of Social Work Contacts;<br>Occupational Therapy Care Plan                                     | Yes  | 6(1)(e) Official Authority vested in the controller (arising from various Children's Social Work legislation)<br><br>9(2)(h) Provision of social care | Name;<br>Date of Birth;<br>Address;<br>Contact Details;<br>Health Information;<br>Records of Social Work Contacts;<br>Occupational Therapy Care Plan                                     | Other Statutory Agencies including NHS Lothian and 3rd Sector Support Agencies involved in delivering services and aids   | No   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 3 years  |
| <b>Part 12: Training</b>  |   |  |  |            |  |  |  |   |  |   |  |   |                                |  |  |
| No processing of personal data takes place under this category of activity. |   |  |  |            |  |  |  |   |  |   |  |   |                                |  |  |
| <b>Part 13: Young People's Service (formerly youth offending)</b>           |   |  |  |            |  |  |  |   |  |   |  |   |                                |  |  |

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|--|--|---|--|------------|--|--|--|--|--|--|--------------------------------------|---|--------------------------------|--|--|
|  |  |   |  |            |  |  |  |  | Categories of Recipients of Disclosure (if any)  | Destination of Transfer of Data (if any)   | Subject to Automated Decision Making | 3rd Party Data Processor Used   | Joint Data Controller (if any) | Technical & Organisational Measures taken to Protect Personal Data   | Envisaged Time Limits for Erasure of Personal Information (See CEC Records Retention Schedule for further details) |
| 2.13.01  | Maintenance of social work case file for children receiving a service from the Young Peoples Service | Maintenance of Social Work Records recording social work interventions and contacts with client.                            | ICT system: Swift<br>Paper based case file                 | Structured | Children; Families and other Relevant People; Professionals working with the Child | Name; Date of Birth; Address; Contact Details; Social Background Information; Family composition; Health Information; Records of Social Work Contacts; Care Plan; Record of court proceedings; Criminal Justice Orders | Yes  | 6(1)(e) Official Authority vested in the controller (arising from various Children's Criminal Justice Social Work legislation)<br><br>9(2)(h) Provision of social care | Name; Date of Birth; Address; Contact Details; Social Background Information; Family composition; Health Information; Records of Social Work Contacts; Care Plan; Record of court proceedings; Criminal Justice Orders | Other Statutory Agencies including Scottish Children's Reporter Administration (SCRA), Police Scotland and NHS Lothian and 3rd Sector Support Agencies involved in delivering social work services | No                                   | Yes - Providers of ICT Services under CEC contract frameworks   | None                           | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 5 years  |
| <b>Section 3: Community Safety and Emergencies</b> |  |   |  |            |  |  |  |  |  |  |                                      |   |                                |  |  |
| <b>Part 1: Advice</b>                              |  |   |  |            |  |  |  |  |  |  |                                      |   |                                |  |  |
| 3.01.01  | Record of advice given to householders about home safety and fire safety                             | Details of assessments made and advice offered to clients seeking advice on home and fire safety                            | ICT System: Northgate<br>Paper based case file             | Structured | Householders   | Name; Date of Birth; Address; Contact Details; Summary of home circumstances; Details of identified vulnerabilities  | No   | 6(1)(e) Official Authority vested in the controller (arising from various Community Safety legislation)  | Name; Date of Birth; Address; Contact Details; Summary of home circumstances; Details of identified vulnerabilities  | Other Statutory Agencies including Social Work, Police Scotland and the Scottish Fire & Rescue Service to support provision of required advice.  | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 5 years  |
| <b>Part 2: Community Safety</b>                    |  |   |  |            |  |  |  |  |  |  |                                      |   |                                |  |  |
| 3.02.01  | Recording of public space CCTV images  | Recording of all images captured by CCTV cameras in public spaces across Edinburgh.   | ICT System: Council Network                                | Structured | All people within areas covered by public space CCTV                               | Images of individuals  | Yes  | 6(1)(e) Official Authority vested in the controller (arising from various Community Safety legislation)<br><br>9(2)(h) Provision of social protection services         | Images of individuals  | Police Scotland and the Scottish Court Service   | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.   | 7 days unless needed for crime prevention / criminal investigation   |
| 3.02.01  | Record of Environmental Warden investigations  | Notes and evidence collected by Environmental Wardens undertaking investigations into littering, graffiti and other matters | ICT System: Northgate<br>Paper based investigation records | Structured | Members of the public who are subject to investigation; Witnesses'                 | Name; Date of Birth; Address; Contact Details; Investigation details and findings; Record of actions arising from investigation  | Yes  | 6(1)(e) Official Authority vested in the controller (arising from various Community Safety legislation)<br><br>9(2)(h) Provision of social protection services         | Name; Date of Birth; Address; Contact Details; Investigation details and findings; Record of actions arising from investigation  | Police Scotland and the Scottish Court Service   | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 5 years  |
| 3.02.03  | Record of Anti Social Behaviour investigations   | Notes and evidence collected by Anti Social Behaviour teams undertaking investigations into Anti social behaviour           | ICT System: Northgate<br>Paper based investigation records | Structured | Members of the public who are subject to investigation; Witnesses'                 | Name; Date of Birth; Address; Contact Details; Investigation details and findings; Record of actions arising from investigation  | Yes  | 6(1)(e) Official Authority vested in the controller (arising from various Community Safety legislation)<br><br>9(2)(h) Provision of social protection services         | Name; Date of Birth; Address; Contact Details; Investigation details and findings; Record of actions arising from investigation  | Police Scotland and the Scottish Court Service   | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 5 years  |
| <b>Part 3: Emergency Service</b>                   |  |   |  |            |  |  |  |  |  |  |                                      |   |                                |  |  |

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|---|---|---|--|-----------------------------|-----------------------------|---|------------------------------------|--|--|--|-------------------------------|---|--|--|---------|
|   |   |   |  |                             |                             |   |                                    | Categories of Recipients of Disclosure (if any)  | Destination of Transfer of Data (if any)             | Subject to Automated Decision Making   | 3rd Party Data Processor Used | Joint Data Controller (if any)  | Technical & Organisational Measures taken to Protect Personal Data | Envisaged Time Limits for Erasure of Personal Information (See CEC Records Retention Schedule for further details)                             |         |
| No processing of personal data takes place under this category of activity.                         |   |   |  |                             |                             |   |                                    |  |  |  |                               |   |  |  |         |
| <b>Part 4: Enforcement</b>  |   |   |  |                             |                             |   |                                    |  |  |  |                               |   |  |  |         |
| Activity no longer covered by the Council arising from the Police & Fire Reform (Scotland) Act 2012 |   |   |  |                             |                             |   |                                    |  |  |  |                               |   |  |  |         |
| <b>Part 5: Fire Prevention</b>  |   |   |  |                             |                             |   |                                    |  |  |  |                               |   |  |  |         |
| Activity no longer covered by the Council arising from the Police & Fire Reform (Scotland) Act 2012 |   |   |  |                             |                             |   |                                    |  |  |  |                               |   |  |  |         |
| <b>Section 4 : Consumer Affairs</b>   |   |   |  |                             |                             |   |                                    |  |  |  |                               |   |  |  |         |
| <b>Part 1: Advice</b>   |   |   |  |                             |                             |   |                                    |  |  |  |                               |   |  |  |         |
| 4.01.01   | Provision of welfare rights advice  | Clients self refer to service and are provided with advice and representation about welfare rights matters.                       | ICT system: Swift<br>Paper based case file | Structured                  | Clients                     | Name;<br>Address;<br>Contact Details;<br>Financial Circumstances;<br>Household Composition;<br>Health information | Yes                                | 6(1)(a) Consent<br><br>9(2)(a) Explicit Consent of the Data Subject.<br><br>Consent has been assessed to be appropriate for this activity using the CEC Consent Worthiness Proforma. | Public Sector Agencies;<br>Voluntary Sector Agencies | Onward referral to partner agencies if data subject agrees to referral being made. | No                            | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None   | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 7 years |
| 4.01.02   | Provision of debt advice  | Clients self refer to service and are provided with advice and representation about debt management matters.                      | ICT system: Swift<br>Paper based case file | Structured                  | Clients                     | Name;<br>Address;<br>Contact Details;<br>Financial Circumstances;<br>Household Composition;<br>Health information | Yes                                | 6(1)(a) Consent<br><br>9(2)(a) Explicit Consent of the Data Subject.<br><br>Consent has been assessed to be appropriate for this activity using the CEC Consent Worthiness Proforma. | Public Sector Agencies;<br>Voluntary Sector Agencies | Onward referral to partner agencies if data subject agrees to referral being made. | No                            | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None   | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 5 years |
| 4.01.03   | Provision of public health advice and services to local residents and businesses including pest control | Clients self refer to service and are provided with advice and services relating to public health issues                          | ICT system: Swift<br>Paper based case file | Structured                  | Clients                     | Name;<br>Address;<br>Contact Details;<br>Service requirements;<br>Payment details                                 | Yes                                | 6(1)(e) Official Authority vested in the controller (arising from Public Health legislation)   | Public Sector Agencies;<br>Voluntary Sector Agencies | Onward referral to partner agencies if data subject agrees to referral being made. | No                            | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None   | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 5 years |
| <b>Part 2: Enforcement &amp; Prosecution of Offenders</b>   |   |   |  |                             |                             |   |                                    |  |  |  |                               |   |  |  |         |
| 4.02.01   | Food Inspection Regime and Food Hygiene Investigations  | Statutory inspection of all food business premises based within the City of Edinburgh and of food hygiene issues raised with CEC. | ICT System: Civica App                     | Structured                  | Business Owners / Operators | Name;<br>Address;<br>Contact Details;<br>Business Name  | No                                 | 6(1)(c) Legal Obligation<br><br>Food Safety Act 1990   | None   | None   | No                            | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None   | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 6 years |

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|---------|--|--|---|-----------------------------|--|--|--|---|--|--------------------------------------|---|--------------------------------|--|--|
|         |  |  |   |                             |  |  |  | Categories of Recipients of Disclosure (if any)   | Destination of Transfer of Data (if any)   | Subject to Automated Decision Making | 3rd Party Data Processor Used   | Joint Data Controller (if any) | Technical & Organisational Measures taken to Protect Personal Data   | Envisaged Time Limits for Erasure of Personal Information (See CEC Records Retention Schedule for further details) |
| 4.02.02 | Investigation of Statutory Nuisance Complaints   | Receipt of complaints leads to commencement of investigation. Information gathered by relevant staff.  | ICT System: Civica App<br>Paper based investigation records | Structured                  | Complainants and Subjects of Complaint       | No   | 6(1)(c) Legal Obligation<br>Environmental Protection (Scotland) Act 1990   | None  | None                                       | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br>Hard copy files securely stored and access restricted to relevant staff. | 6 years  |
| 4.02.03 | Regulator for odour release for Seafield Waste Water Treatment Works                         | Receipt of complaints leads to commencement of investigation. Information gathered by relevant staff.  | ICT System: Civica App<br>Paper based investigation records | Structured                  | Complainants                                 | No   | 6(1)(c) Legal Obligation<br>Water Services etc (Scotland) Act 2005   | None  | None                                       | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br>Hard copy files securely stored and access restricted to relevant staff. | 6 years  |
| 4.02.04 | Regulation of Smoke Control Area   | Receipt of complaints leads to commencement of investigation. Information gathered by relevant staff.  | ICT System: Civica App<br>Paper based investigation records | Structured                  | Complainants and Subjects of Complaint       | No   | 6(1)(c) Legal Obligation<br>Clean Air Act 1993   | None  | None                                       | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br>Hard copy files securely stored and access restricted to relevant staff. | 6 years  |
| 4.02.05 | Recording of Infectious Diseases Occurrences   | Notification of Infectious Disease outbreaks   | ICT System: Civica App<br>Paper based investigation records | Structured                  | Citizens diagnosed with Infectious Diseases  | Yes  | 6(1)(c) Legal Obligation<br>Public Health Act<br>9(2)(b) Social Protection Legal Obligations                                 | Name; Address; Infectious Disease diagnosis; Household Composition; GP Practice Details   | NHS Lothian                                | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br>Hard copy files securely stored and access restricted to relevant staff. | 7 years  |
| 4.02.06 | Investigation and prosecution of offences committed in respect of dangerous and wild animals | Receipt of allegations leads to commencement of investigation. Information gathered by relevant staff. | ICT System: Civica App<br>Paper based investigation records | Structured                  | Individuals who are subject to investigation | Yes  | 6(1)(c) Legal Obligation<br>Dangerous Wild Animals Act 1976<br>9(2)(b) Social Protection Legal Obligations                   | Name; Date of Birth; Address; Contact Details; Investigation details and findings; Record of actions and prosecution arising from investigation | Police Scotland and Scottish Court Service | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br>Hard copy files securely stored and access restricted to relevant staff. | 7 years  |
| 4.02.07 | Issuing of Care Notices about animal health and welfare                                      | Receipt of allegations leads to commencement of investigation. Information gathered by relevant staff. | ICT System: Civica App<br>Paper based investigation records | Structured                  | Individuals who are subject to investigation | Yes  | 6(1)(c) Legal Obligation<br>The Animal Health and Welfare Act (Scotland) 2006<br>9(2)(b) Social Protection Legal Obligations | Name; Date of Birth; Address; Contact Details; Investigation details and findings; Record of actions and prosecution arising from investigation | None                                       | No                                   | Yes - Providers of ICT Services under CEC contract frameworks   | None                           | ICT System Access Controls and ICT Security Protocols applied.<br>Hard copy files securely stored and access restricted to relevant staff. | 6 years  |

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**Named Data Protection Officer:** Kevin Wilbraham, Information Governance Manager  
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**Date Updated:** 09/02/2021  
**Scheduled Date of Next Review:** 01/03/2022  
**Version Number:** 2

| Ref     | Purpose of Processing   | Description of Processing   | Format of Data  |            | Categories of Data Subjects                                       | Categories of Personal Data  | Does Processing include Special Categories of Personal Data? | Lawfulness of Processing Condition   | Disclosure and Transfer  |   | Processing Activities                |  |   | Security and Disposal  |  |
|---------|---|---|---|------------|---|--|--|--|--|---|--------------------------------------|--|---|--|--|
|         |   |   |   |            |   |  |  |  | Categories of Recipients of Disclosure (if any)  | Destination of Transfer of Data (if any)                                      | Subject to Automated Decision Making | 3rd Party Data Processor Used  | Joint Data Controller (if any)  | Technical & Organisational Measures taken to Protect Personal Data   | Envisaged Time Limits for Erasure of Personal Information (See CEC Records Retention Schedule for further details) |
| 4.02.08 | Records of Fixed Penalty Notices issued for consumer affairs issues such as waste, litter and dog fouling | Fixed Penalty Notice issued in response to action or inaction observed  | ICT System: Civica App<br>Paper based investigation records | Structured | Individual who are subject to a Fixed Penalty Notice being issued | Name;<br>Date of Birth;<br>Address;<br>Contact Details;<br>Circumstances and evidence leading to FPN being issued  | Yes  | 6(1)(e) Official Authority vested in the controller (arising from various Consumer Affairs legislation)<br><br>9(2)(h) Provision of social protection services   | None   | none  | No                                   | Yes - Providers of ICT Services under CEC contract frameworks  | None  | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 5 years  |
| 4.02.09 | Trading Standards Enforcement, Investigations and Prosecutions  | Statutory function to deliver a trading standards service to include investigation of specific complaints and other matters, weights and measures violations and all other Trading Standards enforcement. | ICT System: Civica App<br>Paper based investigation records | Structured | Business Owners / Operators;<br>Consumers / Customers             | Name;<br>Address;<br>Contact Details;<br>Business Name;<br>Details of complaints and investigation;<br>Investigation findings;<br>Enforcement and prosecution outcomes | Yes  | 6(1)(e) Official Authority vested in the controller (arising from various Trading Standards and Consumer Affairs legislation)<br><br>9(2)(h) Provision of social protection services   | Name;<br>Address;<br>Contact Details;<br>Business Name;<br>Details of complaints and investigation;<br>Investigation findings;<br>Enforcement and prosecution outcomes | Police Scotland, Scottish Court Service, OPSS and Scottish and UK Governments | No                                   | Yes - Providers of ICT Services under CEC contract frameworks  | None  | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 6 years  |
| 4.02.10 | Providing opportunity for traders to participate in the Edinburgh Trusted Trader Scheme                   | The Council assesses applications made by Traders to join the Edinburgh Trusted Traders Scheme and advises the scheme of relevant information about the Trader  | ICT System: Civica App<br>Paper based records               | None       | Business Owners / Operators;                                      | Name;<br>Address;<br>Contact Details;<br>Business Name;<br>Details of complaints and investigation;<br>Investigation findings;<br>Enforcement and prosecution outcomes | Yes  | 6(1)(a) Consent<br><br>Consent has been assessed to be appropriate for this activity using the CEC Consent Worthiness Proforma because membership of the scheme is not compulsory and individual traders opt to do so if they wish | Name;<br>Address;<br>Contact Details;<br>Business Name;<br>Details of complaints and investigation;<br>Investigation findings;<br>Enforcement and prosecution outcomes | Edinburgh Trusted Traders Scheme  | No                                   | Yes - Providers of ICT Services under CEC contract frameworks<br><br>Edinburgh Trusted Traders Scheme complaints process and mediation is facilitated by Kent County Council | Once a Trader opts to join the Edinburgh Trusted Trader Scheme, the Data Controller is the Scheme. For some Scheme activities, the Council is a joint data controller | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 6 years  |

**Part 3: Environmental Health**

Processing activities undertaken for the purposes of providing and Environmental Health service are detailed in Part 2: Enforcement & Prosecution of Offenders.

**Part 4: Investigations, inspections and monitoring**

|         |  |  |   |            |  |  |     |  |  |   |    |   |      |  |         |
|---------|--|--|---|------------|--|--|-----|--|--|---|----|---|------|--|---------|
| 4.04.01 | Records of general investigations undertaken in respect of consumer affairs matters. | Receipt of allegations leads to commencement of investigation. Information gathered by relevant staff. | ICT System: Civica App<br>Paper based investigation records | Structured | Individuals who are subject to investigation | Name;<br>Date of Birth;<br>Address;<br>Contact Details;<br>Investigation details and findings;<br>Record of actions and prosecution arising from investigation | Yes | 6(1)(e) Official Authority vested in the controller (arising from various Consumer Affairs legislation)<br><br>9(2)(h) Provision of social protection services | Name;<br>Date of Birth;<br>Address;<br>Contact Details;<br>Investigation details and findings;<br>Record of actions and prosecution arising from investigation | Police Scotland and Scottish Court Service if appropriate | No | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 5 years |
|---------|--|--|---|------------|--|--|-----|--|--|---|----|---|------|--|---------|

Record of Processing Activities as required by Article 30 of the General Data Protection Regulation and Section 61 of the Data Protection Bill

**Data Controller** The City of Edinburgh Council, Waverley Court, 4 East Market Street, Edinburgh, EH8 8BG  
**Named Data Protection Officer:** Kevin Wilbraham, Information Governance Manager  
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|--|--|--|--|-----------------------------|--|--|---|--|--|--------------------------------------|---|--------------------------------|--|--|
|  |  |  |  |                             |  |  |   | Categories of Recipients of Disclosure (if any)  | Destination of Transfer of Data (if any)   | Subject to Automated Decision Making | 3rd Party Data Processor Used   | Joint Data Controller (if any) | Technical & Organisational Measures taken to Protect Personal Data   | Envisaged Time Limits for Erasure of Personal Information (See CEC Records Retention Schedule for further details) |
| 4.04.02  | Records of covert surveillance undertaken in support of consumer affairs investigations and enforcement. | Record of authorisations sought, authorisations not granted and authorisations granted under RIPSAs for Council Officers to undertake covert surveillance as part of an investigation.                               | ICT System: Civica App<br>RIPSA Authorisation<br>Paper based investigation records | Structured                  | Individuals who are subject to covert surveillance authorised via a RISPA Authorisation. | Yes  | 6(1)(c) Legal Obligation<br><br>The Regulation of Investigatory Powers (Scotland) Act 2000<br><br>9(2)(b) Social Protection Legal Obligations     | Name;<br>Date of Birth;<br>Address;<br>Contact Details;<br>Investigation details and findings;<br>Record of authorised surveillance including location, time and duration;<br>Record of actions and prosecution arising from investigation | Police Scotland and Scottish Court Service if appropriate  | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 5 years  |
| <b>Part 5: Registration, certification and licensing</b> |  |  |  |                             |  |  |   |  |  |                                      |   |                                |  |  |
| 4.05.01  | Processing of applications for Civic Licenses (Animals)  | Processing of all applications received for license type and decision making on application. Application either rejected and applicant advised of appeal rights (if any) or application approved and license issued. | ICT System: Civica App   | Structured                  | Applicants for License   | Yes  | 6(1)(e) Official Authority vested in the controller (arising from various Civic Licensing legislation)<br><br>9(2)(g) Substantial public interest | Name;<br>Address;<br>Date of Birth;<br>Contact Details;<br>License Application Details;<br>Health Information relevant to application  | Other Statutory Agencies including Police Scotland and the Scottish Fire & Rescue Service as consultees on licenses application. | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 5 years  |
| 4.05.02  | Processing of applications for Civic Licenses (Entertainment)  | Processing of all applications received for license type and decision making on application. Application either rejected and applicant advised of appeal rights (if any) or application approved and license issued. | ICT System: Civica App<br>Paper based application file                             | Structured                  | Applicants for License   | Yes  | 6(1)(e) Official Authority vested in the controller (arising from various Civic Licensing legislation)<br><br>9(2)(g) Substantial public interest | Name;<br>Address;<br>Date of Birth;<br>Contact Details;<br>License Application Details;<br>Health Information relevant to application  | Other Statutory Agencies including Police Scotland and the Scottish Fire & Rescue Service as consultees on licenses application. | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 5 years  |
| 4.05.03  | Processing of application for Civic Licenses (Selling, renting & trading)                                | Processing of all applications received for license type and decision making on application. Application either rejected and applicant advised of appeal rights (if any) or application approved and license issued. | ICT System: Civica App<br>Paper based application file                             | Structured                  | Applicants for License   | Yes  | 6(1)(e) Official Authority vested in the controller (arising from various Civic Licensing legislation)<br><br>9(2)(g) Substantial public interest | Name;<br>Address;<br>Date of Birth;<br>Contact Details;<br>License Application Details;<br>Health Information relevant to application  | Other Statutory Agencies including Police Scotland and the Scottish Fire & Rescue Service as consultees on licenses application. | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 5 years  |



Record of Processing Activities as required by Article 30 of the General Data Protection Regulation and Section 61 of the Data Protection Bill

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|---------|---|--|--|-----------------------------|-----------------------------|--|---|--|--|--------------------------------------|---|--------------------------------|--|--|
|         |   |  |  |                             |                             |  |   | Categories of Recipients of Disclosure (if any)  | Destination of Transfer of Data (if any)   | Subject to Automated Decision Making | 3rd Party Data Processor Used   | Joint Data Controller (if any) | Technical & Organisational Measures taken to Protect Personal Data   | Envisaged Time Limits for Erasure of Personal Information (See CEC Records Retention Schedule for further details) |
| 4.05.04 | Processing of application for Civic Licenses (Taxis and Private Hire) | Processing of all applications received for license type and decision making on application. Application either rejected and applicant advised of appeal rights (if any) or application approved and license issued. | ICT System: Civica App<br>Paper based application file | Structured                  | Applicants for License      | Yes  | 6(1)(e) Official Authority vested in the controller (arising from various Civic Licensing legislation)<br>9(2)(g) Substantial public interest | Name; Address; Date of Birth; Contact Details; License Application Details; Health Information relevant to application | Other Statutory Agencies including Police Scotland and the Scottish Fire & Rescue Service as consultees on licenses application. | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br>Hard copy files securely stored and access restricted to relevant staff. | 5 years  |
| 4.05.05 | Processing of application for Zoo Licenses                            | Processing of all applications received for license type and decision making on application. Application either rejected and applicant advised of appeal rights (if any) or application approved and license issued. | ICT System: Civica App<br>Paper based application file | Structured                  | Applicants for License      | Yes  | 6(1)(e) Official Authority vested in the controller (arising from various Civic Licensing legislation)<br>9(2)(g) Substantial public interest | Name; Address; Date of Birth; Contact Details; License Application Details; Health Information relevant to application | Other Statutory Agencies including Police Scotland and the Scottish Fire & Rescue Service as consultees on licenses application. | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br>Hard copy files securely stored and access restricted to relevant staff. | 5 years  |
| 4.05.06 | Processing of application for Caravan and Campsite Licenses           | Processing of all applications received for license type and decision making on application. Application either rejected and applicant advised of appeal rights (if any) or application approved and license issued. | ICT System: Civica App<br>Paper based application file | Structured                  | Applicants for License      | Yes  | 6(1)(e) Official Authority vested in the controller (arising from various Civic Licensing legislation)<br>9(2)(g) Substantial public interest | Name; Address; Date of Birth; Contact Details; License Application Details; Health Information relevant to application | Other Statutory Agencies including Police Scotland and the Scottish Fire & Rescue Service as consultees on licenses application. | No                                   | Yes - Providers of ICT Services under CEC contract frameworks   | None                           | ICT System Access Controls and ICT Security Protocols applied.<br>Hard copy files securely stored and access restricted to relevant staff. | 5 years  |
| 4.05.07 | Processing of application for Cemetery Licenses                       | Processing of all applications received for license type and decision making on application. Application either rejected and applicant advised of appeal rights (if any) or application approved and license issued. | ICT System: Civica App<br>Paper based application file | Structured                  | Applicants for License      | Yes  | 6(1)(e) Official Authority vested in the controller (arising from various Civic Licensing legislation)<br>9(2)(g) Substantial public interest | Name; Address; Date of Birth; Contact Details; License Application Details; Health Information relevant to application | Other Statutory Agencies including Police Scotland and the Scottish Fire & Rescue Service as consultees on licenses application. | No                                   | Yes - Providers of ICT Services under CEC contract frameworks   | None                           | ICT System Access Controls and ICT Security Protocols applied.<br>Hard copy files securely stored and access restricted to relevant staff. | 5 years  |

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|---------|---|--|--|------------|-----------------------------|---|--|---|---|--|--------------------------------------|---|--------------------------------|--|--|
|         |   |  |  |            |                             |   |  |   | Categories of Recipients of Disclosure (if any)   | Destination of Transfer of Data (if any)   | Subject to Automated Decision Making | 3rd Party Data Processor Used                                 | Joint Data Controller (if any) | Technical & Organisational Measures taken to Protect Personal Data   | Envisaged Time Limits for Erasure of Personal Information (See CEC Records Retention Schedule for further details) |
| 4.05.08 | Processing of application for Crematoria Licenses                 | Processing of all applications received for license type and decision making on application. Application either rejected and applicant advised of appeal rights (if any) or application approved and license issued. | ICT System: Civica App<br>Paper based application file | Structured | Applicants for License      | Name;<br>Address;<br>Date of Birth;<br>Contact Details;<br>License Application Details;<br>Health Information relevant to application | Yes  | 6(1)(e) Official Authority vested in the controller (arising from various Civic Licensing legislation)<br><br>9(2)(g) Substantial public interest | Name;<br>Address;<br>Date of Birth;<br>Contact Details;<br>License Application Details;<br>Health Information relevant to application | Other Statutory Agencies including Police Scotland and the Scottish Fire & Rescue Service as consultees on licenses application. | No                                   | Yes - Providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 5 years  |
| 4.05.09 | Processing of application for Licenses for the sale of explosives | Processing of all applications received for license type and decision making on application. Application either rejected and applicant advised of appeal rights (if any) or application approved and license issued. | ICT System: Civica App<br>Paper based application file | Structured | Applicants for License      | Name;<br>Address;<br>Date of Birth;<br>Contact Details;<br>License Application Details;<br>Health Information relevant to application | Yes  | 6(1)(e) Official Authority vested in the controller (arising from various Civic Licensing legislation)<br><br>9(2)(g) Substantial public interest | Name;<br>Address;<br>Date of Birth;<br>Contact Details;<br>License Application Details;<br>Health Information relevant to application | Other Statutory Agencies including Police Scotland and the Scottish Fire & Rescue Service as consultees on licenses application. | No                                   | Yes - Providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 5 years  |
| 4.05.10 | Processing of application for Alcohol License                     | Processing of all applications received for license type and decision making on application. Application either rejected and applicant advised of appeal rights (if any) or application approved and license issued. | ICT System: Civica App<br>Paper based application file | Structured | Applicants for License      | Name;<br>Address;<br>Date of Birth;<br>Contact Details;<br>License Application Details;<br>Health Information relevant to application | Yes  | 6(1)(e) Official Authority vested in the controller (arising from various Civic Licensing legislation)<br><br>9(2)(g) Substantial public interest | Name;<br>Address;<br>Date of Birth;<br>Contact Details;<br>License Application Details;<br>Health Information relevant to application | Other Statutory Agencies including Police Scotland and the Scottish Fire & Rescue Service as consultees on licenses application. | No                                   | Yes - Providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 5 years  |
| 4.05.11 | Processing of application for Petroleum Storage Licenses          | Processing of all applications received for license type and decision making on application. Application either rejected and applicant advised of appeal rights (if any) or application approved and license issued. | ICT System: Civica App<br>Paper based application file | Structured | Applicants for License      | Name;<br>Address;<br>Date of Birth;<br>Contact Details;<br>License Application Details;<br>Health Information relevant to application | Yes  | 6(1)(e) Official Authority vested in the controller (arising from various Civic Licensing legislation)<br><br>9(2)(g) Substantial public interest | Name;<br>Address;<br>Date of Birth;<br>Contact Details;<br>License Application Details;<br>Health Information relevant to application | Other Statutory Agencies including Police Scotland and the Scottish Fire & Rescue Service as consultees on licenses application. | No                                   | Yes - Providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 5 years  |

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|---------|--|--|--|------------|-----------------------------|---|--|---|---|--|--------------------------------------|---|--------------------------------|--|--|
|         |  |  |  |            |                             |   |  |   | Categories of Recipients of Disclosure (if any)   | Destination of Transfer of Data (if any)   | Subject to Automated Decision Making | 3rd Party Data Processor Used   | Joint Data Controller (if any) | Technical & Organisational Measures taken to Protect Personal Data   | Envisaged Time Limits for Erasure of Personal Information (See CEC Records Retention Schedule for further details) |
| 4.05.12 | Processing of application for registering a reservoir                    | Processing of all applications received for license type and decision making on application. Application either rejected and applicant advised of appeal rights (if any) or application approved and license issued. | ICT System: Civica App<br>Paper based application file | Structured | Applicants for License      | Name;<br>Address;<br>Date of Birth;<br>Contact Details;<br>License Application Details;<br>Health Information relevant to application | Yes  | 6(1)(e) Official Authority vested in the controller (arising from various Civic Licensing legislation)<br><br>9(2)(g) Substantial public interest | Name;<br>Address;<br>Date of Birth;<br>Contact Details;<br>License Application Details;<br>Health Information relevant to application | Other Statutory Agencies including Police Scotland and the Scottish Fire & Rescue Service as consultees on licenses application. | No                                   | Yes - Providers of ICT Services under CEC contract frameworks   | None                           | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 5 years  |
| 4.05.13 | Processing of application for a scaffolding permit a scarp metal license | Processing of all applications received for license type and decision making on application. Application either rejected and applicant advised of appeal rights (if any) or application approved and license issued. | ICT System: Civica App<br>Paper based application file | Structured | Applicants for License      | Name;<br>Address;<br>Date of Birth;<br>Contact Details;<br>License Application Details;<br>Health Information relevant to application | Yes  | 6(1)(e) Official Authority vested in the controller (arising from various Civic Licensing legislation)<br><br>9(2)(g) Substantial public interest | Name;<br>Address;<br>Date of Birth;<br>Contact Details;<br>License Application Details;<br>Health Information relevant to application | Other Statutory Agencies including Police Scotland and the Scottish Fire & Rescue Service as consultees on licenses application. | No                                   | Yes - Providers of ICT Services under CEC contract frameworks   | None                           | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 5 years  |
| 4.05.14 | Processing of application for a gambling licenses                        | Processing of all applications received for license type and decision making on application. Application either rejected and applicant advised of appeal rights (if any) or application approved and license issued. | ICT System: Civica App<br>Paper based application file | Structured | Applicants for License      | Name;<br>Address;<br>Date of Birth;<br>Contact Details;<br>License Application Details;<br>Health Information relevant to application | Yes  | 6(1)(e) Official Authority vested in the controller (arising from various Civic Licensing legislation)<br><br>9(2)(g) Substantial public interest | Name;<br>Address;<br>Date of Birth;<br>Contact Details;<br>License Application Details;<br>Health Information relevant to application | Other Statutory Agencies including Police Scotland and the Scottish Fire & Rescue Service as consultees on licenses application. | No                                   | Yes - Providers of ICT Services under CEC contract frameworks   | None                           | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 5 years  |
| 4.05.15 | Processing of application for all other Civic Government licenses types  | Application for other licenses such as credit licensing, highway projection licensing, lottery registration and non-medicinal poisons licensing.   | ICT System: Civica App<br>Paper based application file | Structured | Applicants for License      | Name;<br>Address;<br>Date of Birth;<br>Contact Details;<br>License Application Details;<br>Health Information relevant to application | Yes  | 6(1)(e) Official Authority vested in the controller (arising from various Civic Licensing legislation)<br><br>9(2)(g) Substantial public interest | Name;<br>Address;<br>Date of Birth;<br>Contact Details;<br>License Application Details;<br>Health Information relevant to application | Other Statutory Agencies including Police Scotland and the Scottish Fire & Rescue Service as consultees on licenses application. | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 5 years  |

**Section 5: Council Property**

**Part 1: Council property maintenance**

No processing of personal data takes place under this category of activity.

**Part 2: Property acquisition and disposal**

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|--|--|---|---|-----------------------------|--|--|------------------------------------|--|---|--|-------------------------------|---|--|--|--|
|  |  |   |   |                             |  |  |                                    | Categories of Recipients of Disclosure (if any)  | Destination of Transfer of Data (if any)                                  | Subject to Automated Decision Making           | 3rd Party Data Processor Used | Joint Data Controller (if any)  | Technical & Organisational Measures taken to Protect Personal Data | Envisaged Time Limits for Erasure of Personal Information (See CEC Records Retention Schedule for further details)                         |  |
| 5.02.01                                      | Maintaining records documenting the sale of council property             | Documenting the negotiation of a property sale, the purchase process, the property transfer and payment received.   | ICT System: Council Network<br>Paper based conveyancing file          | Structured                  | Prospective purchasers of council property; Purchasers of council property | Name; Date of Birth; Address; Contact Details; Proof of Identity Checks; Anti Money Laundering Checks; Details of purchase | No                                 | 6(1)(b) Performance of a contract to which the data subject is party   | Name; Date of Birth; Address; Contact Details; Details of purchase agreed | Registers of Scotland                          | No                            | Yes - Providers of ICT Services under CEC contract frameworks   | None   | ICT System Access Controls and ICT Security Protocols applied.<br>Hard copy files securely stored and access restricted to relevant        | 6 years  |
| <b>Part 3: Property and asset management</b> |  |   |   |                             |  |  |                                    |  |   |  |                               |   |  |  |  |
| 5.03.01                                      | Documenting the on-going management of council property and assets       | Case files including lease arrangements, variations and terminations, photographs of property fabric, records of payment and tendering of works   | ICT System: Council Network<br>Paper based property file              | Structured                  | Tenants  | Name; Address; Contact Details; Details of lease; Payment details  | No                                 | 6(1)(b) Performance of a contract to which the data subject is party   | None  | None   | No                            | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None   | ICT System Access Controls and ICT Security Protocols applied.<br>Hard copy files securely stored and access restricted to relevant staff. | 6 years  |
| 5.03.02                                      | Issuing security passes to staff   | Maintenance of access controls via allocation of rights of access to staff  | ICT System: Council Network<br>Paper based Access Authorisation Forms | Structured                  | Employees  | Name; Job Title; Work Location; Access permissions   | No                                 | 6(1)(e) Official Authority vested in the controller (arising from various Local Government and Information Management legislation)                         | None  | None   | No                            | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None   | ICT System Access Controls and ICT Security Protocols applied.<br>Hard copy files securely stored and access restricted to relevant staff. | 1 year   |
| 5.03.03                                      | Issuing security passes to visitors to Council premises                  | Maintenance of access controls via registration of visitors to council premises   | Paper based Visitor Passes  | Structured                  | Employees  | Name; Premise visited;   | No                                 | 6(1)(e) Official Authority vested in the controller (arising from various Local Government and Information Management legislation)                         | None  | None   | No                            | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None   | Hard copy files securely stored and access restricted to relevant staff.   | 1 month  |
| 5.03.04                                      | Recording of CCTV images within council properties                       | Recording of all images captured by CCTV cameras in council properties across Edinburgh.  | ICT System: Council Network   | Structured                  | All people within areas covered by CCTV cameras within council premises    | Images of individuals  | Yes                                | 6(1)(e) Official Authority vested in the controller (arising from various Community Safety legislation)<br>9(2)(h) Provision of social protection services | Images of individuals   | Police Scotland and the Scottish Court Service | No                            | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None   | ICT System Access Controls and ICT Security Protocols applied.   | 7 days unless needed for crime prevention / criminal investigation |
| 5.03.05                                      | Maintaining records of driver usage within the Council fleet of vehicles | Records detailing the driving hours undertaken by each employee who undertakes fleet management duties, including the use of telematics devices in fleet vehicles and the recording of fuel usage | ICT System: Council Network<br>Paper based driver hours records       | Structured                  | Employees  | Name; Job Title; Driving License Number; Driving hours undertaken  | No                                 | 6(1)(e) Official Authority vested in the controller (arising from various Roads and Traffic legislation)   | None  | None   | No                            | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None   | ICT System Access Controls and ICT Security Protocols applied.<br>Hard copy files securely stored and access restricted to relevant staff. | 7 years  |

Record of Processing Activities as required by Article 30 of the General Data Protection Regulation and Section 61 of the Data Protection Bill

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 Named Data Protection Officer: Kevin Wilbraham, Information Governance Manager  
 Contact Details: E-mail: information.compliance@edinburgh.gov.uk Telephone: 0131 469 6200

Date Updated: 09/02/2021  
 Scheduled Date of Next Review: 01/03/2022  
 Version Number: 2

| Ref   | Purpose of Processing   | Description of Processing   | Format of Data   | Categories of Data Subjects | Categories of Personal Data  | Does Processing include Special Categories of Personal Data?  | Lawfulness of Processing Condition | Disclosure and Transfer   |   | Processing Activities  |                               |   | Security and Disposal  |  |           |
|---|---|---|--|-----------------------------|--|---|------------------------------------|---|---|--|-------------------------------|---|--|--|-----------|
|   |   |   |  |                             |  |   |                                    | Categories of Recipients of Disclosure (if any)   | Destination of Transfer of Data (if any)  | Subject to Automated Decision Making   | 3rd Party Data Processor Used | Joint Data Controller (if any)  | Technical & Organisational Measures taken to Protect Personal Data | Envisaged Time Limits for Erasure of Personal Information (See CEC Records Retention Schedule for further details)                             |           |
| <b>Section 6: Crematoria and cemeteries</b>                                 |   |   |  |                             |  |   |                                    |   |   |  |                               |   |  |  |           |
| <b>Part 1: Burial identity and cemeteries</b>                               |   |   |  |                             |  |   |                                    |   |   |  |                               |   |  |  |           |
| 6.01.01   | Maintenance of register of ownership and occupation of burial plots maintained by CEC   | Details of purchase and ownership of individual plots and record of burials and interment of ashes which take place, register and plan of headstone and other markers | ICT System: Comino<br>Paper based register of plot owners and plot use | Structured                  | Burial plot purchasers and owners;<br>Next of Kin of deceased individuals buried or interned in plot | Name;<br>Date of Birth;<br>Address;<br>Contact Details;   | No                                 | 6(1)(e) Official Authority vested in the controller (arising from various Registration and Local Government legislation)  | None  | None   | No                            | Yes - Providers of ICT Services under CEC contract frameworks   | None   | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | Permanent |
| 6.01.02   | Maintenance of record of cremations, interments and monument erections which occur in CEC managed cemeteries                            | Details of date of event and purpose of event along with details of the deceased person and their next of kin   | ICT System: Comino<br>Paper based register of plot owners and plot use | Structured                  | Next of Kin of deceased individuals buried or interned in plot                                       | Name;<br>Date of Birth;<br>Address;<br>Contact Details;<br>Summary of arrangements made   | No                                 | 6(1)(e) Official Authority vested in the controller (arising from various Registration and Local Government legislation)  | None  | None   | No                            | Yes - Providers of ICT Services under CEC contract frameworks   | None   | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 15 years  |
| <b>Part 2: Maintenance of burial grounds</b>                                |   |   |  |                             |  |   |                                    |   |   |  |                               |   |  |  |           |
| No processing of personal data takes place under this category of activity. |   |   |  |                             |  |   |                                    |   |   |  |                               |   |  |  |           |
| <b>Section 7: Criminal Justice</b>  |   |   |  |                             |  |   |                                    |   |   |  |                               |   |  |  |           |
| <b>Part 1: Supporting offenders</b>   |   |   |  |                             |  |   |                                    |   |   |  |                               |   |  |  |           |
| 7.01.01   | Provision of social work services for Adults Offenders in Edinburgh who are subject to Life License and OLR (Lifelong Supervision)      | Maintenance of Social Work Records for Adult Offenders Social Work clients recording social work interventions and contacts with client.                              | ICT system: Swift<br>Paper based case file                             | Structured                  | Clients of Service   | Name;<br>Date of Birth;<br>Address;<br>Contact Details;<br>Social Background Information;<br>Offending history and current risk assessment;<br>Health Information;<br>Records of Social Work Contacts;<br>Care Plan | Yes                                | 6(1)(e) Official Authority vested in the controller (arising from various Criminal Justice and Adult Social Work legislation)<br><br>9(2)(h) Provision of social care | Name;<br>Date of Birth;<br>Address;<br>Contact Details;<br>Social Background Information;<br>Offending history and current risk assessment;<br>Health Information;<br>Records of Social Work Contacts;<br>Care Plan | Other Statutory Agencies including Police Scotland and NHS Lothian and 3rd Sector Support Agencies involved in delivering support plan | No                            | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None   | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 100 years |
| 7.01.02   | Provision of social work services for Adults Offenders in Edinburgh who have been convicted of a Schedule 1 offence or a sexual offence | Maintenance of Social Work Records for Adult Offenders Social Work clients recording social work interventions and contacts with client.                              | ICT system: Swift<br>Paper based case file                             | Structured                  | Clients of Service   | Name;<br>Date of Birth;<br>Address;<br>Contact Details;<br>Social Background Information;<br>Offending history and current risk assessment;<br>Health Information;<br>Records of Social Work Contacts;<br>Care Plan | Yes                                | 6(1)(e) Official Authority vested in the controller (arising from various Criminal Justice and Adult Social Work legislation)<br><br>9(2)(h) Provision of social care | Name;<br>Date of Birth;<br>Address;<br>Contact Details;<br>Social Background Information;<br>Offending history and current risk assessment;<br>Health Information;<br>Records of Social Work Contacts;<br>Care Plan | Other Statutory Agencies including Police Scotland and NHS Lothian and 3rd Sector Support Agencies involved in delivering support plan | No                            | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None   | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 100 years |

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| Ref     | Purpose of Processing  | Description of Processing  | Format of Data                             |            | Categories of Data Subjects | Categories of Personal Data   | Does Processing include Special Categories of Personal Data? | Lawfulness of Processing Condition  | Disclosure and Transfer   |  | Processing Activities                |   |                                | Security and Disposal  |  |
|---------|--|--|--|------------|-----------------------------|---|--|---|---|--|--------------------------------------|---|--------------------------------|--|--|
|         |  |  |  |            |                             |   |  |   | Categories of Recipients of Disclosure (if any)   | Destination of Transfer of Data (if any)   | Subject to Automated Decision Making | 3rd Party Data Processor Used   | Joint Data Controller (if any) | Technical & Organisational Measures taken to Protect Personal Data   | Envisaged Time Limits for Erasure of Personal Information (See CEC Records Retention Schedule for further details) |
| 7.01.03 | Provision of social work services for Adults Offenders in Edinburgh who have been convicted of a Schedule 2 Sexual Offence | Maintenance of Social Work Records for Adult Offenders Social Work clients recording social work interventions and contacts with client. | ICT system: Swift<br>Paper based case file | Structured | Clients of Service          | Name;<br>Date of Birth;<br>Address;<br>Contact Details;<br>Social Background Information;<br>Offending history and current risk assessment;<br>Health Information;<br>Records of Social Work Contacts;<br>Care Plan | Yes  | 6(1)(e) Official Authority vested in the controller (arising from various Criminal Justice and Adult Social Work legislation)<br><br>9(2)(h) Provision of social care | Name;<br>Date of Birth;<br>Address;<br>Contact Details;<br>Social Background Information;<br>Offending history and current risk assessment;<br>Health Information;<br>Records of Social Work Contacts;<br>Care Plan | Other Statutory Agencies including Police Scotland and NHS Lothian and 3rd Sector Support Agencies involved in delivering support plan | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 5 years  |
| 7.01.04 | Provision of social work services for Adults Offenders in Edinburgh who have committed an offence against a child          | Maintenance of Social Work Records for Adult Offenders Social Work clients recording social work interventions and contacts with client. | ICT system: Swift<br>Paper based case file | Structured | Clients of Service          | Name;<br>Date of Birth;<br>Address;<br>Contact Details;<br>Social Background Information;<br>Offending history and current risk assessment;<br>Health Information;<br>Records of Social Work Contacts;<br>Care Plan | Yes  | 6(1)(e) Official Authority vested in the controller (arising from various Criminal Justice and Adult Social Work legislation)<br><br>9(2)(h) Provision of social care | Name;<br>Date of Birth;<br>Address;<br>Contact Details;<br>Social Background Information;<br>Offending history and current risk assessment;<br>Health Information;<br>Records of Social Work Contacts;<br>Care Plan | Other Statutory Agencies including Police Scotland and NHS Lothian and 3rd Sector Support Agencies involved in delivering support plan | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 100 years  |
| 7.01.05 | Provision of social work services for Adults Offenders in Edinburgh who have committed any other offence.                  | Maintenance of Social Work Records for Adult Offenders Social Work clients recording social work interventions and contacts with client. | ICT system: Swift<br>Paper based case file | Structured | Clients of Service          | Name;<br>Date of Birth;<br>Address;<br>Contact Details;<br>Social Background Information;<br>Offending history and current risk assessment;<br>Health Information;<br>Records of Social Work Contacts;<br>Care Plan | Yes  | 6(1)(e) Official Authority vested in the controller (arising from various Criminal Justice and Adult Social Work legislation)<br><br>9(2)(h) Provision of social care | Name;<br>Date of Birth;<br>Address;<br>Contact Details;<br>Social Background Information;<br>Offending history and current risk assessment;<br>Health Information;<br>Records of Social Work Contacts;<br>Care Plan | Other Statutory Agencies including Police Scotland and NHS Lothian and 3rd Sector Support Agencies involved in delivering support plan | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 3 years  |

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| Ref                            | Purpose of Processing   | Description of Processing  | Format of Data   |            | Categories of Data Subjects   | Categories of Personal Data   | Does Processing include Special Categories of Personal Data? | Lawfulness of Processing Condition  | Disclosure and Transfer   |  | Processing Activities                |   |                                | Security and Disposal  |  |
|--------------------------------|---|--|--|------------|---|---|--|---|---|--|--------------------------------------|---|--------------------------------|--|--|
|                                |   |  |  |            |   |   |  |   | Categories of Recipients of Disclosure (if any)   | Destination of Transfer of Data (if any)   | Subject to Automated Decision Making | 3rd Party Data Processor Used   | Joint Data Controller (if any) | Technical & Organisational Measures taken to Protect Personal Data   | Envisaged Time Limits for Erasure of Personal Information (See CEC Records Retention Schedule for further details) |
| 7.01.06                        | Provision of social work services for Adults accused of offending but not convicted including participation in diversion from prosecution service provision | Maintenance of Social Work Records for Adult Offenders Social Work clients recording social work interventions and contacts with client.   | ICT system: Swift<br>Paper based case file                 | Structured | Clients of Service  | Name;<br>Date of Birth;<br>Address;<br>Contact Details;<br>Social Background Information;<br>Offending history and current risk assessment;<br>Health Information;<br>Records of Social Work Contacts;<br>Care Plan | Yes  | 6(1)(e) Official Authority vested in the controller (arising from various Criminal Justice and Adult Social Work legislation)<br><br>9(2)(h) Provision of social care | Name;<br>Date of Birth;<br>Address;<br>Contact Details;<br>Social Background Information;<br>Offending history and current risk assessment;<br>Health Information;<br>Records of Social Work Contacts;<br>Care Plan | Other Statutory Agencies including Police Scotland and NHS Lothian and 3rd Sector Support Agencies involved in delivering support plan | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | Destroyed immediately  |
| 7.01.07                        | Participation in multi-agency arrangements for identifying and managing offenders according to the level of harm they pose to the public.                   | Participation in MAPPA (Multi Agency Public Protection Assessment) and maintenance of Social Work Records for cases considered.  | ICT system: Swift<br>Paper based case file                 | Structured | Individuals managed under MAPPA arrangements  | Name;<br>Date of Birth;<br>Address;<br>Contact Details;<br>Social Background Information;<br>Offending history and current risk assessment;<br>Health Information;<br>Records of Social Work Contacts;<br>Care Plan | Yes  | 6(1)(e) Official Authority vested in the controller (arising from various Criminal Justice and Adult Social Work legislation)<br><br>9(2)(h) Provision of social care | Name;<br>Date of Birth;<br>Address;<br>Contact Details;<br>Social Background Information;<br>Offending history and current risk assessment;<br>Health Information;<br>Records of Social Work Contacts;<br>Care Plan | Other Statutory Agencies including Police Scotland and NHS Lothian and 3rd Sector Support Agencies involved in delivering support plan | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 5 years  |
| <b>Section 8: Democracy</b>    |   |  |  |            |   |   |  |   |   |  |                                      |   |                                |  |  |
| <b>Part 1: Decision Making</b> |   |  |  |            |   |   |  |   |   |  |                                      |   |                                |  |  |
| 8.01.01                        | Webcasting of Council and Committee meetings  | Council and committee meetings of the council are broadcast via the web.   | ICT System: Council Network                                | Structured | Elected Councillors;<br>Council Officers;<br>Members of the Public attending Council and Committee meetings | Video images;<br>Sound Recording  | No   | 6(1)(e) Official Authority vested in the controller (arising from various Local Government and Access to Information legislation)                                     | Video images;<br>Sound Recording  | Images broadcast via the internet  | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.   | 5 years  |
| 8.01.02                        | Administration of Council and Committee meetings  | Processing of personal data required as part of the agenda papers for meetings, record of proceedings at meetings and record of Members attendance at Council and Committee meetings | ICT System: Council Network<br>Paper based meeting records | Structured | Elected Councillors;  | Name;<br>Attendance on specified date   | No   | 6(1)(e) Official Authority vested in the controller (arising from various Local Government and Access to Information legislation)                                     | None  | None   | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | Records kept permanently   |
| <b>Part 2: Executive</b>       |   |  |  |            |   |   |  |   |   |  |                                      |   |                                |  |  |

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|---|--|--|---|-----------------------------|-----------------------------|---|------------------------------------|---|---|---|-------------------------------|---|--|--|--------------------------|
|   |  |  |   |                             |                             |   |                                    | Categories of Recipients of Disclosure (if any)   | Destination of Transfer of Data (if any)  | Subject to Automated Decision Making  | 3rd Party Data Processor Used | Joint Data Controller (if any)  | Technical & Organisational Measures taken to Protect Personal Data | Envisaged Time Limits for Erasure of Personal Information (See CEC Records Retention Schedule for further details)                         |                          |
| 8.02.02   | Record of Appointments of Statutory Officers of the Council                      | Record of Officers appointment to Statutory roles of the Council   | ICT System: Council Network<br>Paper based meeting records    | Structured                  | Council Officers            | Name;<br>Job Title;<br>Date of Appointment;<br>Date appointment ended   | No                                 | 6(1)(e) Official Authority vested in the controller (arising from various Local Government and Access to Information legislation)           | None  | None  | No                            | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None   | ICT System Access Controls and ICT Security Protocols applied.<br>Hard copy files securely stored and access restricted to relevant staff. | Records kept permanently |
| <b>Part 3: Governance</b>   |  |  |   |                             |                             |   |                                    |   |   |   |                               |   |  |  |                          |
| 8.03.01   | Establishment and functioning of Community Councils                              | Processing relating to establishment of Community Councils, Community Council elections and provision of advice and support to Community Councils, particularly on governance matters. | ICT System: Council Network<br>Paper based meeting records    | Structured                  | Council Officers            | Name;<br>Address;<br>Election of Community Council;<br>Community Council complaints   | No                                 | 6(1)(e) Official Authority vested in the controller (arising from various Local Government and Community Council / empowerment legislation) | Name;<br>Address;<br>Election of Community Council;<br>Community Council complaints   | Relevant Community Council / officials within Community Council   | No                            | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None   | ICT System Access Controls and ICT Security Protocols applied.<br>Hard copy files securely stored and access restricted to relevant staff. | 6 years                  |
| <b>Part 4: Honours and Awards</b>   |  |  |   |                             |                             |   |                                    |   |   |   |                               |   |  |  |                          |
| 8.04.01   | Record of Honours Submissions  | Honours nomination forms and letters of support made by the Lord Provost in their role as Lord Lieutenant for the City of Edinburgh.   | ICT System: Council Network<br>Paper based nomination details | Structured                  | Nominees for Honours        | Name;<br>Date of Birth;<br>Address;<br>Contact Details;<br>Details of nomination including professional or personal background information and achievements.  | No                                 | 6(1)(e) Official Authority vested in the controller (arising from various Local Government legislation)                                     | Name;<br>Date of Birth;<br>Address;<br>Contact Details;<br>Details of nomination including professional or personal background information and achievements.  | Disclosed to UK and Scottish Parliaments and the Royal Household as part of the honours nomination process. | No                            | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None   | ICT System Access Controls and ICT Security Protocols applied.<br>Hard copy files securely stored and access restricted to relevant staff. | 5 years                  |
| <b>Part 5: Member Support</b>   |  |  |   |                             |                             |   |                                    |   |   |   |                               |   |  |  |                          |
| 8.05.01   | Maintenance of records of Elected Members declarations of interests              | The Council is required to maintain a record of individual Members declarations of interests.  | ICT System: Modern.gov<br>Paper based declaration forms       | Structured                  | Elected Members             | Name;<br>Address;<br>Sources of remuneration;<br>Related undertakings;<br>Contracts held with the CEC;<br>Election expenses;<br>Ownership of houses, land and buildings;<br>Ownership of shares and securities;<br>Gifts and hospitality received | No                                 | 6(1)(c) Legal Obligation<br><br>The Ethical Standards in Public Life etc (Scotland) Act 2000  | Name;<br>Address;<br>Sources of remuneration;<br>Related undertakings;<br>Contracts held with the CEC;<br>Election expenses;<br>Ownership of houses, land and buildings;<br>Ownership of shares and securities;<br>Gifts and hospitality received | Published online for public to view   | No                            | Yes - Providers of ICT Services under CEC contract frameworks   | None   | ICT System Access Controls and ICT Security Protocols applied.<br>Hard copy files securely stored and access restricted to relevant staff. | 8 years                  |
| <b>Part 6: Planning</b>   |  |  |   |                             |                             |   |                                    |   |   |   |                               |   |  |  |                          |
| No processing of personal data takes place under this category of activity. |  |  |   |                             |                             |   |                                    |   |   |   |                               |   |  |  |                          |
| <b>Part 7: Representation</b>   |  |  |   |                             |                             |   |                                    |   |   |   |                               |   |  |  |                          |
| 8.07.01   | Record of Appointments of Returning Officer and Deputy returning Officers by CEC | Record of Officers appointment   | ICT System: Council Network<br>Paper based meeting records    | Structured                  | Council Officers            | Name;<br>Job Title;<br>Date of Appointment;<br>Date appointment ended   | No                                 | 6(1)(e) Official Authority vested in the controller (arising from various Electoral legislation)  | None  | None  | No                            | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None   | ICT System Access Controls and ICT Security Protocols applied.<br>Hard copy files securely stored and access restricted to relevant staff. | 1 year                   |



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|---|--|---|---|------------|---|--|--|---|---|--|--------------------------------------|---|--------------------------------|--|--|
|   |  |   |   |            |   |  |  |   | Categories of Recipients of Disclosure (if any)                               | Destination of Transfer of Data (if any) | Subject to Automated Decision Making | 3rd Party Data Processor Used   | Joint Data Controller (if any) | Technical & Organisational Measures taken to Protect Personal Data   | Envisaged Time Limits for Erasure of Personal Information (See CEC Records Retention Schedule for further details) |
| 8.07.02   | Scottish Parliamentary Election records  | Records of election process including nomination forms; notice of appointments; notice of candidature and declarations of result and candidate spending declarations. | ICT System: Council Network<br>Paper based election files | Structured | Candidates for Election; Election Agents; Election Candidate nominees | Name; Date of Birth; Political Affiliation (if any); Address; Contact Details                        | Yes  | 6(1)(e) Official Authority vested in the controller (arising from various Electoral legislation)<br>9(2)(g) Substantial public interest | Name; Date of Birth; Political Affiliation (if any); Address; Contact Details | Published online for public to view      | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br>Hard copy files securely stored and access restricted to relevant staff. | 2 years  |
| 8.07.03   | UK Parliamentary Election records  | Records of election process including nomination forms; notice of appointments; notice of candidature and declarations of result and candidate spending declarations. | ICT System: Council Network<br>Paper based election files | Structured | Candidates for Election; Election Agents; Election Candidate nominees | Name; Date of Birth; Political Affiliation (if any); Address; Contact Details                        | Yes  | 6(1)(e) Official Authority vested in the controller (arising from various Electoral legislation)<br>9(2)(g) Substantial public interest | Name; Date of Birth; Political Affiliation (if any); Address; Contact Details | Published online for public to view      | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br>Hard copy files securely stored and access restricted to relevant staff. | 3 years  |
| 8.07.04   | European Parliament Election records   | Records of election process including nomination forms; notice of appointments; notice of candidature and declarations of result and candidate spending declarations. | ICT System: Council Network<br>Paper based election files | Structured | Candidates for Election; Election Agents; Election Candidate nominees | Name; Date of Birth; Political Affiliation (if any); Address; Contact Details                        | Yes  | 6(1)(e) Official Authority vested in the controller (arising from various Electoral legislation)<br>9(2)(g) Substantial public interest | Name; Date of Birth; Political Affiliation (if any); Address; Contact Details | Published online for public to view      | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br>Hard copy files securely stored and access restricted to relevant staff. | 4 years  |
| 8.07.05   | Local Government Election records  | Records of election process including nomination forms; notice of appointments; notice of candidature and declarations of result and candidate spending declarations. | ICT System: Council Network<br>Paper based election files | Structured | Candidates for Election; Election Agents; Election Candidate nominees | Name; Date of Birth; Political Affiliation (if any); Address; Contact Details                        | Yes  | 6(1)(e) Official Authority vested in the controller (arising from various Electoral legislation)<br>9(2)(g) Substantial public interest | Name; Date of Birth; Political Affiliation (if any); Address; Contact Details | Published online for public to view      | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br>Hard copy files securely stored and access restricted to relevant staff. | 5 years  |
| <b>Section 9: Economic Development</b>                                      |  |   |   |            |   |  |  |   |   |  |                                      |   |                                |  |  |
| <b>Part 1: Research</b>   |  |   |   |            |   |  |  |   |   |  |                                      |   |                                |  |  |
| No processing of personal data takes place under this category of activity. |  |   |   |            |   |  |  |   |   |  |                                      |   |                                |  |  |
| <b>Part 2: Promotion and relations</b>                                      |  |   |   |            |   |  |  |   |   |  |                                      |   |                                |  |  |
| 9.02.01   | Development of services and activities to enhance international relations across the City of Edinburgh | Record of services and activities undertaken  | ICT System: Business Gateway                              | Structured | Business operator<br>Representatives of partner agencies<br>Citizens  | Name; Address; Contact Details; Business details; Summary of services and activities participated in | No   | 6(1)(e) Official Authority vested in the controller (arising from various Economic Development legislation)                             | None  | None                                     | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.   | 3 years  |
| <b>Citizens</b>   |  |   |   |            |   |  |  |   |   |  |                                      |   |                                |  |  |

Record of Processing Activities as required by Article 30 of the General Data Protection Regulation and Section 61 of the Data Protection Bill

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**Named Data Protection Officer:** Kevin Wilbraham, Information Governance Manager  
**Contact Details:** E-mail: information.compliance@edinburgh.gov.uk Telephone: 0131 469 6200

**Date Updated:** 09/02/2021  
**Scheduled Date of Next Review:** 01/03/2022  
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| Ref   | Purpose of Processing   | Description of Processing  | Format of Data   |            | Categories of Data Subjects    | Categories of Personal Data   | Does Processing include Special Categories of Personal Data? | Lawfulness of Processing Condition   | Disclosure and Transfer  |   | Processing Activities                |   |   | Security and Disposal  |  |
|---|---|--|--|------------|--------------------------------|---|--|--|--|---|--------------------------------------|---|---|--|--|
|   |   |  |  |            |                                |   |  |  | Categories of Recipients of Disclosure (if any)  | Destination of Transfer of Data (if any)  | Subject to Automated Decision Making | 3rd Party Data Processor Used   | Joint Data Controller (if any)  | Technical & Organisational Measures taken to Protect Personal Data   | Envisaged Time Limits for Erasure of Personal Information (See CEC Records Retention Schedule for further details) |
| 9.03.01   | Provision of business start up, business development and investment information and advice    | Record of advice and support provided to enquirer  | ICT System: Business Gateway                                     | Structured | Prospective business operators | Name; Address; Contact Details; Business proposal; Summary of advice requested  | No   | 6(1)(e) Official Authority vested in the controller (arising from various Economic Development legislation)  | None   | None  | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None  | ICT System Access Controls and ICT Security Protocols applied.   | 3 years  |
| 9.03.02   | Provision of business development support services  | Record of advice and support provided to enquirer  | ICT System: Business Gateway                                     | Structured | Prospective business operators | Name; Address; Contact Details; Business proposal; Summary of advice requested  | No   | 6(1)(e) Official Authority vested in the controller (arising from various Economic Development legislation)  | None   | None  | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None  | ICT System Access Controls and ICT Security Protocols applied.   | 3 years  |
| 9.03.03   | Provision of funding for business development, employability and regeneration projects        | Record of advice and support provided to enquirer  | ICT System: Business Gateway                                     | Structured | Prospective business operators | Name; Address; Contact Details; Business proposal; Summary of advice requested  | No   | 6(1)(e) Official Authority vested in the controller (arising from various Economic Development legislation)  | None   | None  | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None  | ICT System Access Controls and ICT Security Protocols applied.   | 3 years  |
| <b>Part 4: Sustainability</b>   |   |  |  |            |                                |   |  |  |  |   |                                      |   |   |  |  |
| No processing of personal data takes place under this category of activity. |   |  |  |            |                                |   |  |  |  |   |                                      |   |   |  |  |
| <b>Part 5: Tourism development</b>  |   |  |  |            |                                |   |  |  |  |   |                                      |   |   |  |  |
| No processing of personal data takes place under this category of activity. |   |  |  |            |                                |   |  |  |  |   |                                      |   |   |  |  |
| <b>Part 6: Training</b>   |   |  |  |            |                                |   |  |  |  |   |                                      |   |   |  |  |
| 09.06.01  | Maintenance of records for clients accessing employability services to support them into work | Record of advice and support provided to the enquirer  | ICT System: Caselink   | Structured | Clients seeking employment     | Name; Date of Birth; Address; Contact Details; Ethnic origin; Record of advice and support provided; Relevant health information; Employment information <b>not mandatory:</b> criminal record (not details); housing situation | yes  | 6(1)(e) Official Authority vested in the controller (arising from various Economic Development legislation)<br><br>9(2)(g) Substantial public interest | Name; Date of Birth; Address; Contact Information; Ethnic origin; employment information | employability organisations who are also working with the client (through Caselink) | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | Capital City Partnership are joint controller with CEC. As a CEC arm's-length company, they manage Caselink and contract manage commissioned services | ICT System Access controls and ICT security protocols applied.<br><br>M.I.S. access restricted and each project/organisation can only see/access their own data. | 7 years  |
| <b>Part 7: Business Improvement Districts</b>                               |   |  |  |            |                                |   |  |  |  |   |                                      |   |   |  |  |
| 09.07.01  | Maintenance of records of BID ballot process  | Records including notice of Ballot, ballot administration, ballot papers, proxy appointments and declaration of the result | ICT System: Council Network<br><br>Paper based records of ballot | Structured | BID members                    | Name; Address; Contact Details  | No   | 6(1)(c) Compliance with a legal obligation<br><br>Business Improvement Districts (Scotland) Regulations 2007   | None   | None  | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None  | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff.                   | 5 years  |
| <b>Section 10: Education</b>  |   |  |  |            |                                |   |  |  |  |   |                                      |   |   |  |  |
| <b>Part 1: Access and inclusion</b>   |   |  |  |            |                                |   |  |  |  |   |                                      |   |   |  |  |

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|--|--|--|--|------------|---------------------------------|--|--|---|--|--|--|---|--------------------------------|--|--|
|  |  |  |  |            |                                 |  |  |   | Categories of Recipients of Disclosure (if any)  | Destination of Transfer of Data (if any)   | Subject to Automated Decision Making   | 3rd Party Data Processor Used   | Joint Data Controller (if any) | Technical & Organisational Measures taken to Protect Personal Data   | Envisaged Time Limits for Erasure of Personal Information (See CEC Records Retention Schedule for further details) |
| 10.01.01                                 | Administering home education applications  | Processing of applications received from parents for home education including consideration of proposed education methods and basic information about the child/ren        | ICT System: Council Network<br>Paper based application records | Structured | Children;<br>Parent / guardians | Name;<br>Date of Birth;<br>Address;<br>Contact Details;<br>Proposed education provision;<br>Basic information about education and other needs of the child   | No   | 6(1)(e) Official Authority vested in the controller (arising from various Education legislation)  | None   | None   | No   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 21 years   |
| <b>Part 2: Admissions and exclusions</b> |  |  |  |            |                                 |  |  |   |  |  |  |   |                                |  |  |
| 10.02.01                                 | Managing the school and nursery admission process  | Records about school admissions applications including child and family details and schools application, including the reason(s) for any out of catchment application made | ICT System: SEEMIS<br>Paper based application records          | Structured | Children;<br>Parent / guardians | Name;<br>Date of Birth;<br>Address;<br>Contact Details;<br>Parent / Guardian details;<br>Health information relevant to education;   | Yes  | 6(1)(e) Official Authority vested in the controller (arising from various Education legislation)<br><br>9(2)(b) Social Protection obligations | None   | None   | Not subject to automated decision making.<br><br>The council uses automation software for aspects of this processing | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 2 years  |
| 10.02.02                                 | Records of exclusions from education and action as taking to seek to prevent a child being excluded from education | Records of exclusions from education and action as taking to seek to prevent a child being excluded from education   | ICT System: SEEMIS<br>Paper based application records          | Structured | Children;<br>Parent / guardians | Name;<br>Date of Birth;<br>Address;<br>Contact Details;<br>Parent / Guardian details;<br>Reasons for exclusion / potential exclusion;<br>Details of support plan and contacts with child and parent / guardian | Yes  | 6(1)(e) Official Authority vested in the controller (arising from various Education legislation)<br><br>9(2)(b) Social Protection obligations | Name;<br>Date of Birth;<br>Address;<br>Contact Details;<br>Parent / Guardian details;<br>Reasons for exclusion / potential exclusion;<br>Details of support plan and contacts with child and parent / guardian | Other Statutory Agencies including Scottish Children's Reporter Administration (SCRA) and NHS Lothian and 3rd Sector Support Agencies involved in delivering support and advice services | No   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 21 years   |
| 10.02.03                                 | Records of schools rolls   | Records showing attendance and absence for schools   | ICT System: SEEMIS   | Structured | Children                        | Name;<br>Attendance at school on specified date  | No   | 6(1)(e) Official Authority vested in the controller (arising from various Education legislation)  | None   | None   | No   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.   | 6 years  |
| <b>Part 3: Advice</b>                    |  |  |  |            |                                 |  |  |   |  |  |  |   |                                |  |  |
| 10.03.01                                 | Handling of Education / School Complaints  | Receipt, investigation and resolution of complaints made about education services  | ICT system: SEEMIS<br>Paper based case file                    | Structured | Complainants                    | Name;<br>Date of Birth;<br>Address;<br>Contact Details;<br>Details of Complaint;<br>Complaint Investigation;<br>Complaint Conclusion   | Yes  | 6(1)(e) Official Authority vested in the controller (arising from various Education legislation)<br><br>9(2)(b) Social Protection obligations | None   | None   | No   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 2 years  |

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|---|---|---|--|------------|---|--|--|---|---|--|--------------------------------------|---|--------------------------------|--|--|
|   |   |   |  |            |   |  |  |   | Categories of Recipients of Disclosure (if any) | Destination of Transfer of Data (if any) | Subject to Automated Decision Making | 3rd Party Data Processor Used   | Joint Data Controller (if any) | Technical & Organisational Measures taken to Protect Personal Data   | Envisaged Time Limits for Erasure of Personal Information (See CEC Records Retention Schedule for further details) |
| 10.03.02                                  | Provision of support and guidance advice to parents / carers about education matters and wider issues which impact on education | Records detailing support and guidance offered and services accessed  | ICT system: SEEMIS<br>Paper based case file                | Structured | Complainants  | Name;<br>Contact Details;<br>Summary of support and guidance offered;<br>Services accessed;<br>Outcomes  | Yes  | 6(1)(e) Official Authority vested in the controller (arising from various Education legislation)<br><br>9(2)(b) Social Protection obligations | None  | None                                     | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 2 years  |
| <b>Part 4: Arts and creative learning</b> |   |   |  |            |   |  |  |   |   |  |                                      |   |                                |  |  |
| 10.04.01                                  | Records relating to applications and bids received for Arts funding   | All records including funding applications, correspondence, funding agreements / contracts, payment information and evaluation information            | ICT System: Council Network<br>Paper based funding records | Structured | Applicants for funding;                                     | Name;<br>Date of Birth;<br>Address;<br>Contact Details;<br>Funding Application / performance details;  | No   | 6(1)(e) Official Authority vested in the controller (arising from various Education legislation)  | None  | None                                     | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 5 years  |
| 10.04.02                                  | Records relating to the provision of instrumental music lessons and other music activities to young people                      | All records of instrumental music lessons including instrumental music staff files and pupil progress records   | ICT System: Council Network<br>Paper based service records | Structured | Pupils;<br>Employees  | Name;<br>Record of music lessons attended and progress made  | No   | 6(1)(e) Official Authority vested in the controller (arising from various Education legislation)  | None  | None                                     | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 6 years  |
| 10.04.03                                  | Provision of school trips, residential events and outdoor education   | All records relating to the provision of schools trips, residential events and outdoor education courses to school pupils as part of their education. | ICT system: SEEMIS<br>Paper based activity records         | Structured | Pupils  | Name;<br>Date of Birth;<br>Address;<br>Contact Details;<br>Parent / Guardian details;<br>Emergency Contact Information;<br>Health Information;<br>Parental consent forms | Yes  | 6(1)(e) Official Authority vested in the controller (arising from various Education legislation)<br><br>9(2)(b) Social Protection obligations | None  | None                                     | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 2 years  |
| <b>Part 5: Curriculum development</b>     |   |   |  |            |   |  |  |   |   |  |                                      |   |                                |  |  |
| 10.05.01                                  | Provision of education , support and monitoring of educational progress, including through use of IT Apps and other packages    | Records of baseline tests and assessments undertaken throughout the course of a child's education   | ICT System: SEEMIS   | Structured | Pupils;<br>Employees (including Teaching staff);<br>Parents | Name;<br>Date of Birth;<br>School attended;<br>Records of educational support needs;<br>Records of educational progress  | Yes  | 6(1)(e) Official Authority vested in the controller (arising from various Education legislation)<br><br>9(2)(b) Social Protection obligations | None  | None                                     | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.   | 5 years  |
| <b>Part 6: Education welfare</b>          |   |   |  |            |   |  |  |   |   |  |                                      |   |                                |  |  |

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|----------|--|---|--|------------|-----------------------------|--|--|---|--|--|--------------------------------------|---|--------------------------------|--|--|
|          |  |   |  |            |                             |  |  |   | Categories of Recipients of Disclosure (if any)  | Destination of Transfer of Data (if any)   | Subject to Automated Decision Making | 3rd Party Data Processor Used   | Joint Data Controller (if any) | Technical & Organisational Measures taken to Protect Personal Data   | Envisaged Time Limits for Erasure of Personal Information (See CEC Records Retention Schedule for further details) |
| 10.06.01 | Provision of education to pupils and maintenance of Personal Pupil Record (PPR) for each school pupil                              | All pupil records, guidance records and report cards maintained for the child within the school   | ICT System: SEEMIS<br>Paper based pupil file | Structured | Pupils                      | Name;<br>Date of Birth;<br>School attended;<br>Pupil Record  | No   | 6(1)(e) Official Authority vested in the controller (arising from various Education legislation)  | Name;<br>Date of Birth;<br>School attended;<br>Pupil Record  | Other Statutory Agencies including Scottish Children's Reporter Administration (SCRA) and NHS Lothian and 3rd Sector Support Agencies involved in delivering support and advice services | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 5 years  |
| 10.06.02 | Maintenance of individual pupil files containing health, child protection, attendance and other information of a sensitive nature. | Records of child welfare concerns, medical and medication matters, School health care plans and all other sensitive personal data records               | ICT System: SEEMIS<br>Paper based pupil file | Structured | Pupils                      | Name;<br>Date of Birth;<br>School attended;<br>Health and medical information;<br>Child welfare and protection concerns;<br>Child support plan       | Yes  | 6(1)(e) Official Authority vested in the controller (arising from various Education legislation)<br><br>9(2)(b) Social Protection obligations | Name;<br>Date of Birth;<br>School attended;<br>Health and medical information;<br>Child welfare and protection concerns;<br>Child support plan | Other Statutory Agencies including Scottish Children's Reporter Administration (SCRA) and NHS Lothian and 3rd Sector Support Agencies involved in delivering support and advice services | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 5 years  |
| 10.06.03 | Provision of education to pupils with special educational needs  | All pupil records, guidance records and report cards maintained for the child within the school   | ICT System: SEEMIS<br>Paper based pupil file | Structured | Pupils                      | Name;<br>Date of Birth;<br>School attended;<br>Health and medical information;<br>Child welfare and protection concerns;<br>Child support plan       | Yes  | 6(1)(e) Official Authority vested in the controller (arising from various Education legislation)<br><br>9(2)(b) Social Protection obligations | Name;<br>Date of Birth;<br>School attended;<br>Health and medical information;<br>Child welfare and protection concerns;<br>Child support plan | Other Statutory Agencies including Scottish Children's Reporter Administration (SCRA) and NHS Lothian and 3rd Sector Support Agencies involved in delivering support and advice services | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 23 years   |
| 10.06.04 | School attendance records  | Records showing attendance and absence for schools  | ICT System: SEEMIS                           | Structured | Children                    | Name;<br>Attendance at school on specified date  | No   | 6(1)(e) Official Authority vested in the controller (arising from various Education legislation)  | None   | None   | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.   | 6 years  |
| 10.06.05 | Processing application for free school meals and school clothing grants  | All processing associated with considering applications including notifying applicants of outcome of application and making payment of any benefit due. | ICT System: iWorld                           | Structured | Applicants                  | Name;<br>Address;<br>Contact Details;<br>Household composition;<br>Household financial circumstances;<br>Application details;<br>Payment information | No   | 6(1)(e) Official Authority vested in the controller (arising from various Education legislation)  | None   | None   | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.   | 6 years  |

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|---|---|---|---|------------|----------------------------------|--|--|--|--|--|--|---|--------------------------------|--|--|
|   |   |   |   |            |                                  |  |  |  | Categories of Recipients of Disclosure (if any)                      | Destination of Transfer of Data (if any) | Subject to Automated Decision Making   | 3rd Party Data Processor Used   | Joint Data Controller (if any) | Technical & Organisational Measures taken to Protect Personal Data | Envisaged Time Limits for Erasure of Personal Information (See CEC Records Retention Schedule for further details) |
| 10.06.06  | Processing applications for Educational Maintenance Allowance and making payment to successful applicants | All processing associated with considering applications including notifying applicants of outcome of application and making payment of any benefit due. | ICT System: iWorld                                | Structured | Applicants                       | Name; Address; Contact Details; Household composition; Household financial circumstances; Application details; Payment information | No   | 6(1)(e) Official Authority vested in the controller (arising from various Education legislation)                           | None   | None                                     | Not subject to automated decision making.<br>The council uses automation software for aspects of this processing | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.     | 6 years  |
| 10.06.07  | Processing applications for Early Learning Childcare & Funded Hours and making payments of funding        | All processing associated with considering applications including notifying applicants of outcome of application and making payment of any benefit due. | ICT System: iWorld                                | Structured | Applicants; Early Year providers | Name; Address; Contact Details; Household composition; Household financial circumstances; Application details; Payment information | No   | 6(1)(e) Official Authority vested in the controller (arising from various Education legislation)                           | None   | None                                     | No   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.     | 6 years  |
| <b>Part 7: Employment skills</b>  |   |   |   |            |                                  |  |  |  |  |  |  |   |                                |  |  |
| No processing of personal data takes place under this category of activity. |   |   |   |            |                                  |  |  |  |  |  |  |   |                                |  |  |
| <b>Part 8: Life long learning</b>   |   |   |   |            |                                  |  |  |  |  |  |  |   |                                |  |  |
| 10.08.01  | Records of participation in lifelong learning activities  | All records associated with the provision of lifelong learning activities including enrolment details, participation and achievements.                  | ICT System: SEEMIS<br>Paper based learner records | Structured | Learners                         | Name; Date of Birth; Address; Contact Details; Learning Records  | No   | 6(1)(e) Official Authority vested in the controller (arising from various Education legislation)                           | None   | None                                     | No   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.     | 3 years  |
| 10.08.02  | Provision of community engagement and community planning events   | All processing associated with planning and running events  | ICT System: SEEMIS<br>Paper based learner records | Structured | Participants in events           | Name; Date of Birth; Address; Contact Details; Participation records   | No   | 6(1)(e) Official Authority vested in the controller (arising from various Education and Community development legislation) | Name; Date of Birth; Address; Contact Details; Participation records | Funders                                  | No   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.     | 3 years  |

Record of Processing Activities as required by Article 30 of the General Data Protection Regulation and Section 61 of the Data Protection Bill

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| Ref                                  | Purpose of Processing   | Description of Processing   | Format of Data                                    |            | Categories of Data Subjects   | Categories of Personal Data   | Does Processing include Special Categories of Personal Data? | Lawfulness of Processing Condition  | Disclosure and Transfer  |   | Processing Activities                |   |                                | Security and Disposal  |  |
|--------------------------------------|---|---|---|------------|---|---|--|---|--|---|--------------------------------------|---|--------------------------------|--|--|
|                                      |   |   |   |            |   |   |  |   | Categories of Recipients of Disclosure (if any)  | Destination of Transfer of Data (if any)  | Subject to Automated Decision Making | 3rd Party Data Processor Used   | Joint Data Controller (if any) | Technical & Organisational Measures taken to Protect Personal Data   | Envisaged Time Limits for Erasure of Personal Information (See CEC Records Retention Schedule for further details) |
| 10.08.03                             | Identification and application for funding opportunities for neighbourhood development activities                             | All processing associated with considering applications including notifying applicants of outcome of application and making payment of any benefit due.   | ICT System: SEEMIS<br>Paper based learner records | Structured | Learners  | Name;<br>Date of Birth;<br>Address;<br>Contact Details;<br>Participation records  | No   | 6(1)(e) Official Authority vested in the controller (arising from various Education and Community development legislation)  | Name;<br>Date of Birth;<br>Address;<br>Contact Details;<br>Participation records   | Funders   | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.   | 3 years  |
| <b>Part 9: Management of schools</b> |   |   |   |            |   |   |  |   |  |   |                                      |   |                                |  |  |
| 10.09.01                             | Incident Recording and Reporting in respect of accidents occurring in or on schools premises                                  | Record of accident including information about person involved, witnesses and details of accident and effects.  | ICT System: SHE Assure                            | Structured | Child involved in an accident within a council premises;<br>Witnesses to accident | Name;<br>Date of Birth;<br>Address;<br>Contact Details;<br>Parent / Guardian name;<br>Health information;<br>Details of accident      | Yes  | 6(1)(c) Compliance with a legal obligation<br><br>Health & Safety at Work etc Act 1974<br><br>9(2)(b) Social protection legal obligations                                   | Name;<br>Date of Birth;<br>Address;<br>Contact Details;<br>Parent / Guardian name;<br>Health information;<br>Details of accident | Accident information shared with Health & safety Executive (HSE) as required by legislation | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.   | 25 years   |
| 10.09.02                             | Processing of applications for licenses to allow children aged under 16 to work and to take part in professional performances | Processing of all applications received for and decision making on application. Application either rejected and applicant advised of appeal rights (if any) or application approved and license issued. | ICT System: Northgate                             | Structured | Applicants for License  | Name;<br>Address;<br>Date of Birth;<br>Contact Details;<br>License Application Details;<br>Health Information relevant to application | Yes  | 6(1)(e) Official Authority vested in the controller (arising from various Education and Civic Licensing legislation)<br><br>9(2)(h) Provision of social protection services | None   | None  | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 5 years  |
| 10.09.03                             | Use of pupils thumb prints for payment for school lunches or provision of a free school meal in secondary schools             | Use of biometric data, in the form of a thumb print, as proof of identify for deduction of lunch costs from pupil account or provision of a free school meal.   | ICT System: SEEMIS                                | Structured | Pupils  | Name;<br>Biometric Thumb print  | Yes  | 6(1)(e) Official Authority vested in the controller (arising from various Education and Civic Licensing legislation)<br><br>9(2)(a) Explicit consent of the data subject    | None   | None  | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.   | 1 year   |

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|----------|--|--|--|------------|-----------------------------|--|--|--|--|--|--------------------------------------|---|--------------------------------|--|--|
|          |  |  |  |            |                             |  |  |  | Categories of Recipients of Disclosure (if any)    | Destination of Transfer of Data (if any)   | Subject to Automated Decision Making | 3rd Party Data Processor Used   | Joint Data Controller (if any) | Technical & Organisational Measures taken to Protect Personal Data   | Envisaged Time Limits for Erasure of Personal Information (See CEC Records Retention Schedule for further details) |
| 10.09.04 | Taking of photographs, videos and audio recordings of children during education activities | Recording and photography of children during education activities  | ICT System: Council Network                  | Structured | Pupils                      | Images of individuals  | Yes  | 6(1)(e) Official Authority vested in the controller (arising from various Education legislation)<br><br>9(2)(a) Explicit consent of the data subject | Images of individuals                              | None   | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.   | 2 years  |
| 10.09.05 | Management of school libraries   | Recording of school library loans and participation in other events and activities offered by school libraries | ICT System: Council Network                  | Structured | Pupils; Employees; Parents  | Name; Class; Library lending; Participation in events and activities                         | Yes  | 6(1)(e) Official Authority vested in the controller (arising from various Education legislation)   | None   | None   | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.   | 2 years  |
| 10.09.06 | Communication with parents/carers about school management matters                          | Records detailing communications sent and received   | ICT system: SEEMIS<br>Paper based case file  | Structured | Pupils; Parents / Carers    | Name; Contact Details; Summary of communication; Actions and outcomes                        | Yes  | 6(1)(e) Official Authority vested in the controller (arising from various Education legislation)<br><br>9(2)(b) Social Protection obligations        | None   | None   | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 2 years  |
| 10.09.07 | Evaluation of outcomes of education interventions for school aged pupils                   | All records, assessment and reports relating to interventions provided to pupils                               | ICT System: SEEMIS<br>Paper based pupil file | Structured | Pupils                      | Name; Date of Birth; School attended; Intervention records; Reports Evaluations and outcomes | No   | 6(1)(e) Official Authority vested in the controller (arising from various Education legislation)   | Name; Date of Birth; School attended; Pupil Record | Other Statutory Agencies including Scottish Children's Reporter Administration (SCRA) and NHS Lothian and 3rd Sector Support Agencies involved in supporting the pupil | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 5 years  |

**Part 10: Teaching**

No processing of personal data takes place under this category of activity.

**Section 11: Environmental Protection**

**Part 1: Advice and audit**



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|---|--|---|--|-----------------------------|---|--|---|--|---|--------------------------------------|---|--------------------------------|--|--|
|   |  |   |  |                             |   |  |   | Categories of Recipients of Disclosure (if any)        | Destination of Transfer of Data (if any)              | Subject to Automated Decision Making | 3rd Party Data Processor Used   | Joint Data Controller (if any) | Technical & Organisational Measures taken to Protect Personal Data   | Envisaged Time Limits for Erasure of Personal Information (See CEC Records Retention Schedule for further details) |
| No processing of personal data takes place under this category of activity. |  |   |  |                             |   |  |   |  |   |                                      |   |                                |  |  |
| <b>Part 2: Conservation</b>   |  |   |  |                             |   |  |   |  |   |                                      |   |                                |  |  |
| 11.02.01  | Record of incidents reported having occurred within Natural Heritage sites   | Record of incidents such as vandalism and sheep worrying as examples  | ICT System: Northgate<br>Paper based incident records        | Structured                  | Members of the public who are involved in incidents; Witnesses' | No   | 6(1)(e) Official Authority vested in the controller (arising from various Environmental Protection legislation)     | None   | None  | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br>Hard copy files securely stored and access restricted to relevant staff. | 6 years  |
| 11.02.02  | Record of Statutory Repair Notices and Emergency Repairs undertaken through the statutory enforcement of property conversation legislation | Details of Statutory Repair Notices issued and emergency repairs undertaken   | ICT System: Northgate<br>Paper based case files              | Structured                  | Property owners   | No   | 6(1)(e) Official Authority vested in the controller (arising from various property conversation legislation)        | None   | None  | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br>Hard copy files securely stored and access restricted to relevant staff. | 20 years   |
| 11.02.03  | Carrying out of repairs in common areas where the Council has a remit to attend to these   | Details of repairs, work undertaken and associated billing records  | ICT System: Northgate<br>Paper based case files              | Structured                  | Property owners   | No   | 6(1)(e) Official Authority vested in the controller (arising from various property conversation legislation)        | Address; Contact Details; Details of repairs required; | Contractors   | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br>Hard copy files securely stored and access restricted to relevant staff. | 20 years   |
| <b>Part 3: Monitoring and investigation</b>                                 |  |   |  |                             |   |  |   |  |   |                                      |   |                                |  |  |
| No processing of personal data takes place under this category of activity. |  |   |  |                             |   |  |   |  |   |                                      |   |                                |  |  |
| <b>Section 12: Finance</b>  |  |   |  |                             |   |  |   |  |   |                                      |   |                                |  |  |
| <b>Part 1: Accounts and audit</b>   |  |   |  |                             |   |  |   |  |   |                                      |   |                                |  |  |
| 12.01.01  | Budget monitoring of salaries, social care package costs and other budget headings involving individuals                                   | Working papers associated with on-going budget monitoring which includes personal data only so far as is necessary to enable that monitoring to occur | ICT System: Council Network<br>Paper based financial records | Structured                  | Employees; Service Users  | No   | 6(1)(e) Official Authority vested in the controller (arising from various Local Government and Finance legislation) | None   | None  | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br>Hard copy files securely stored and access restricted to relevant staff. | 3 years  |
| 12.01.02  | Publication of Senior Officer remuneration packages in CEC Annual Accounts   | Fulfilling the Councils statutory obligation to report on senior officer remuneration within the published Annual Accounts.                           | ICT System: Council Network<br>Paper based financial records | Structured                  | Senior Officers   | No   | 6(1)(e) Official Authority vested in the controller (arising from various Local Government and Finance legislation) | Name; Job Title; Remuneration Package details          | Published in CEC Annual Accounts Statement and Report | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br>Hard copy files securely stored and access restricted to relevant staff. | Permanent  |

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|---|---|---|--|------------|--|---|--|--|---|--|--------------------------------------|---|--------------------------------|--|--|
|   |   |   |  |            |  |   |  |  | Categories of Recipients of Disclosure (if any) | Destination of Transfer of Data (if any) | Subject to Automated Decision Making | 3rd Party Data Processor Used   | Joint Data Controller (if any) | Technical & Organisational Measures taken to Protect Personal Data   | Envisaged Time Limits for Erasure of Personal Information (See CEC Records Retention Schedule for further details) |
| 12.01.03  | Undertaking of internal audits and maintenance of internal audit records  | All internal audit activities undertaken to ensure controls in place within the Council are sufficient and are being adhered to.                    | ICT System: Council Network<br>Paper based audit papers      | Structured | All data subjects  | All data categories   | No   | 6(1)(e) Official Authority vested in the controller (arising from various Local Government and Finance legislation)                  | None  | None                                     | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br>Hard copy files securely stored and access restricted to relevant staff. | 5 years  |
| <b>Part 2: Asset management</b>   |   |   |  |            |  |   |  |  |   |  |                                      |   |                                |  |  |
| No processing of personal data takes place under this category of activity. |   |   |  |            |  |   |  |  |   |  |                                      |   |                                |  |  |
| <b>Part 3: Financial provisions management</b>                              |   |   |  |            |  |   |  |  |   |  |                                      |   |                                |  |  |
| 12.03.01  | Management of gifts, bequests and other donations of funds to the Council | All records associated with gifts, bequests and donation received by the council including initial paperwork and management of funds                | ICT System: Council Network<br>Paper based financial records | Structured | Individuals making gifts, bequests and/or donations to the Council | Name; Address; Contact Details; Details of gift / bequest / donation                                      | No   | 6(1)(e) Official Authority vested in the controller (arising from various Local Government and Finance legislation)                  | None  | None                                     | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br>Hard copy files securely stored and access restricted to relevant staff. | Permanent  |
| 12.03.02  | Documenting gifts and hospitality received by staff                       | All records associated with declarations by staff of gifts and hospitality offered, rejected and received by them in the course of their employment | ICT System: Council Network<br>Paper based financial records | Structured | Employees; Persons offering gifts and/or hospitality to staff      | Name; Job Title; Details of gift and/or hospitality received  | No   | 6(1)(e) Official Authority vested in the controller (arising from various Local Government and Finance legislation)                  | None  | None                                     | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br>Hard copy files securely stored and access restricted to relevant staff. | 10 years   |
| <b>Part 4: Financial transactions management</b>                            |   |   |  |            |  |   |  |  |   |  |                                      |   |                                |  |  |
| 12.04.01  | Processing and payment of purchase and sales invoices                     | All records associated with payments made and received by the Council including supplier / customer information and invoice and payment details.    | ICT System: Oracle<br>Paper based transactions paperwork     | Structured | Suppliers; Customers   | Name; Address; Contact Details; Summary of Service provided or received; Invoice details; Payment details | No   | 6(1)(e) Official Authority vested in the controller (arising from various Local Government and Finance legislation)                  | None  | None                                     | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br>Hard copy files securely stored and access restricted to relevant staff. | 6 years  |
| 12.04.02  | Processing and payment of expenses claims                                 | All records associated with expenses claims made from the Council including expenses details and payment details.                                   | ICT System: Oracle<br>Paper based expenses claims            | Structured | Employees; Contractors   | Name; Job Title; Address; Contact Details; Summary of Expenses occurred; Claim details; Payment details   | No   | 6(1)(e) Official Authority vested in the controller (arising from various Local Government, Social Security and Finance legislation) | None  | None                                     | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br>Hard copy files securely stored and access restricted to relevant staff. | 5 years  |

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|-------------------------------|---|---|-----------------------------|------------|--|---|--|--|---|---|--|---|--------------------------------|--|--|
|                               |   |   |                             |            |  |   |  |  | Categories of Recipients of Disclosure (if any)   | Destination of Transfer of Data (if any)  | Subject to Automated Decision Making   | 3rd Party Data Processor Used   | Joint Data Controller (if any) | Technical & Organisational Measures taken to Protect Personal Data   | Envisaged Time Limits for Erasure of Personal Information (See CEC Records Retention Schedule for further details) |
| 12.04.03                      | Investigation of fraud or potential fraud committed against the Council   | All records associated with investigations into fraud and suspected fraud committed against the Council including financial fraud, housing benefit and Council Tax fraud, blue badge and parking permit misuse and all other potential fraud matters. | ICT System: Council Network | Structured | Employees; Contractors; Claimants; Customers | Name; Date of Birth; Address; Contact Details; Investigation details and findings; Record of actions and prosecution arising from investigation | Yes  | 6(1)(e) Official Authority vested in the controller (arising from various Local Government and Finance legislation)<br><br>9(2)(b) Obligations under employment or social security law OR<br>9(2)(g) Substantial public interest | Name; Date of Birth; Address; Contact Details; Investigation details and findings; Record of actions and prosecution arising from investigation | Depending on the circumstances, information is shared with HMRC, DWP and Police Scotland.   | No   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 6 years  |
| 12.04.04                      | Processing related to the management and allocation of income received by the Council   | All records associated with income received by the Council including payment details and allocation information.  | ICT System: Oracle          | Structured | Payees                                       | Name; Job Title; Address; Contact Details; Summary of Payments made; Payment details  | No   | 6(1)(e) Official Authority vested in the controller (arising from various Local Government, Social Security and Finance legislation)   | None  | None  | No   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 5 years  |
| <b>Part 5: Local taxation</b> |   |   |                             |            |  |   |  |  |   |   |  |   |                                |  |  |
| 12.05.01                      | The assessment and collection of Council Tax liabilities from domestic households in Edinburgh and associated enforcement actions | All processing associated with the collection of council tax due by domestic households in Edinburgh.   | ICT System: Northgate       | Structured | Householders living in Edinburgh             | Name; Address; Contact Details; Household composition; Council Tax liabilities; Payment information   | No   | 6(1)(e) Official Authority vested in the controller (arising from various Local Government Finance and Council Tax legislation)  | Name; Address   | Details of Council Tax payers moving into or out of the boundaries of the City of Edinburgh Council are shared by and to other Local Authorities, letting agents and conveyancing solicitors. | Not subject to automated decision making.<br><br>The council uses automation software for aspects of this processing | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.   | 10 years   |
| 12.05.02                      | Processing applications for Council Tax Reduction   | All processing associated with considering applications for Council Tax reduction including notifying applicants of outcome of application and making payment of any benefit due.   | ICT System: iWorld          | Structured | Applicants                                   | Name; Address; Contact Details; Household composition; Council Tax liabilities; Council Tax reduction application details; Payment information  | No   | 6(1)(e) Official Authority vested in the controller (arising from various Local Government Finance and Council Tax legislation)  | Name; Address; Contact Details; Household composition; Council Tax liabilities; Council Tax reduction application details; Payment information  | Information about benefit applicants and payments is shared with DWP.   | No   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.   | 6 years  |
| 12.05.03                      | Processing applications for Housing Benefit and Discretionary Housing Payments  | All processing associated with considering applications for Housing Benefit including notifying applicants of outcome of application and making payment of any benefit due.   | ICT System: iWorld          | Structured | Applicants                                   | Name; Address; Contact Details; Household composition; Council Tax liabilities; Council Tax reduction application details; Payment information  | No   | 6(1)(e) Official Authority vested in the controller (arising from various Local Government Finance and Council Tax legislation)  | Name; Address; Contact Details; Household composition; Scottish Welfare Fund application details; Payment information                           | Information about benefit applicants and payments is shared with DWP.   | Not subject to automated decision making.<br><br>The council uses automation software for aspects of this processing | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.   | 6 years  |

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|---|--|---|---|------------|--|--|--|---|--|---|--|---|--------------------------------|--|--|
|   |  |   |   |            |  |  |  |   | Categories of Recipients of Disclosure (if any)  | Destination of Transfer of Data (if any)  | Subject to Automated Decision Making   | 3rd Party Data Processor Used   | Joint Data Controller (if any) | Technical & Organisational Measures taken to Protect Personal Data   | Envisaged Time Limits for Erasure of Personal Information (See CEC Records Retention Schedule for further details) |
| 12.05.04  | Processing applications for Scottish Welfare Fund payment  | All processing associated with considering applications for Scottish Welfare Fund funding including notifying applicants of outcome of application and making payment of any benefit due.                     | ICT System: iWorld                                | Structured | Applicants                               | Name; Address; Contact Details; Household composition; Council Tax liabilities; Council Tax reduction application details; Payment information   | No   | 6(1)(e) Official Authority vested in the controller (arising from various Local Government Finance and Council Tax legislation) | Name; Address; Contact Details; Household composition; Housing costs liabilities; Housing benefit application details; Payment information   | Information about benefit applicants and payments is shared with DWP.   | No   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.   | 6 years  |
| 12.05.05  | The assessment and collection of Non-Domestic Rates from non domestic properties in Edinburgh            | All processing associated with the collection of Non Domestic Rates due by non domestic properties in Edinburgh   | ICT System: Northgate                             | Structured | Non Domestic Property Owners / Occupiers | Name; Address; Contact Details; Non Domestic Rate liabilities; Payment information   | No   | 6(1)(e) Official Authority vested in the controller (arising from various Local Government Finance and Council Tax legislation) | Name; Address  | Details of Non Domestic Rate payers moving into or out of the boundaries of the City of Edinburgh Council are shared by and to other Local Authorities, letting agents and conveyancing solicitors. | Not subject to automated decision making.<br>The council uses automation software for aspects of this processing | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.   | 10 years   |
| 12.05.06  | Processing applications for specific grant programmes, including those relating to the COVID 19 pandemic | All processing associated with considering applications for grant(s) including notifying applicants of outcome of application and making payment of any benefit due.  | ICT System: iWorld                                | Structured | Applicants                               | Name; Address; Contact Details; Eligibility information; Payment information   | No   | 6(1)(e) Official Authority vested in the controller (arising from various Local Government Finance and Council Tax legislation) | Name; Address; Contact Details; Household composition; Scottish Welfare Fund application details; Payment information  | Information about grant applicants and payments is shared with the grant funder   | No   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.   | 6 years  |
| <b>Part 6: National taxation</b>  |  |   |   |            |  |  |  |   |  |   |  |   |                                |  |  |
| No processing of personal data takes place under this category of activity. |  |   |   |            |  |  |  |   |  |   |  |   |                                |  |  |
| <b>Part 7: Payroll and pensions</b>   |  |   |   |            |  |  |  |   |  |   |  |   |                                |  |  |
| 12.07.01  | Managing the Councils payroll  | All tasks associated with managing the Councils payroll including calculation of salary payment due and deductions to be made, production of pay slips, year end prints, timesheets and monthly payroll runs. | ICT System: iTrent<br>Paper based payroll records | Structured | Employees                                | Name; Date of Birth; National Insurance Number; Address; Contact Details; Salary Level; Tax Code; Trade Union subscriptions and other at source deductions; Employee Benefits payment due; Overtime and other enhancements; Bank Account details | Yes  | 6(1)(b) Performance of a contract to which the data subject is party<br>9(2)(b) Obligations under employment law                | Name; Date of Birth; National Insurance Number; Address; Contact Details; Salary Level; Tax Code; Trade Union subscriptions and other at source deductions; Employee Benefits payment due; Overtime and other enhancements; Bank Account details | Government Departments such as HMRC and / or DWP as required by statute   | Not subject to automated decision making.<br>The council uses automation software for aspects of this processing | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br>Hard copy files securely stored and access restricted to relevant staff. | 5 years  |

Record of Processing Activities as required by Article 30 of the General Data Protection Regulation and Section 61 of the Data Protection Bill

**Data Controller** The City of Edinburgh Council, Waverley Court, 4 East Market Street, Edinburgh, EH8 8BG  
**Named Data Protection Officer:** Kevin Wilbraham, Information Governance Manager  
**Contact Details:** E-mail: information.compliance@edinburgh.gov.uk Telephone: 0131 469 6200

**Date Updated:** 09/02/2021  
**Scheduled Date of Next Review:** 01/03/2022  
**Version Number:** 2

| Ref      | Purpose of Processing   | Description of Processing   | Format of Data                                    | Categories of Data Subjects | Categories of Personal Data                     | Does Processing include Special Categories of Personal Data? | Lawfulness of Processing Condition   | Disclosure and Transfer  |   | Processing Activities                |   |   | Security and Disposal  |  |          |
|----------|---|---|---|-----------------------------|---|--|--|--|---|--------------------------------------|---|---|--|--|----------|
|          |   |   |   |                             |   |  |  | Categories of Recipients of Disclosure (if any)  | Destination of Transfer of Data (if any)                                | Subject to Automated Decision Making | 3rd Party Data Processor Used   | Joint Data Controller (if any)  | Technical & Organisational Measures taken to Protect Personal Data   | Envisaged Time Limits for Erasure of Personal Information (See CEC Records Retention Schedule for further details)                         |          |
| 12.07.02 | Production of P45 certificates for those leaving employment with the Council                            | All tasks associated with producing P45 certificates for employees at the end of their council employment.              | ICT System: iTrent<br>Paper based payroll records | Structured                  | Employees leaving Council employment            | Yes  | 6(1)(b) Performance of a contract to which the data subject is party<br>9(2)(b) Obligations under employment law | Name;<br>Date of Birth;<br>National Insurance Number;<br>Address;<br>Contact Details;<br>Salary Level;<br>Tax Code;<br>Tax payment in previous tax year          | Government Departments such as HMRC and / or DWP as required by statute | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None  | ICT System Access Controls and ICT Security Protocols applied.<br>Hard copy files securely stored and access restricted to relevant staff. | 5 years  |          |
| 12.07.03 | Production of P60 certificates for all employees at the end of each Tax Year                            | All tasks associated with producing P60 certificates for employees at the end of each tax year.                         | ICT System: iTrent<br>Paper based payroll records | Structured                  | Employees                                       | Yes  | 6(1)(b) Performance of a contract to which the data subject is party<br>9(2)(b) Obligations under employment law | Name;<br>Date of Birth;<br>National Insurance Number;<br>Address;<br>Contact Details;<br>Salary Level;<br>Tax Code;<br>Tax payment in previous tax year          | Government Departments such as HMRC and / or DWP as required by statute | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None  | ICT System Access Controls and ICT Security Protocols applied.<br>Hard copy files securely stored and access restricted to relevant staff. | 5 years  |          |
| 12.07.04 | Statutory Sick Pay Scheme Records   | All tasks associated with processing statutory sick pay payments due to employees.                                      | ICT System: iTrent<br>Paper based payroll records | Structured                  | Employees in receipt of Statutory Sick Pay      | Yes  | 6(1)(b) Performance of a contract to which the data subject is party<br>9(2)(b) Obligations under employment law | Name;<br>Date of Birth;<br>National Insurance Number;<br>Address;<br>Contact Details;<br>Salary Level;<br>Tax Code;<br>Statutory Sick Pay payments received      | Government Departments such as HMRC and / or DWP as required by statute | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None  | ICT System Access Controls and ICT Security Protocols applied.<br>Hard copy files securely stored and access restricted to relevant staff. | 5 years  |          |
| 12.07.05 | Statutory Maternity Pay Scheme Records  | All tasks associated with processing statutory maternity pay payments due to employees.                                 | ICT System: iTrent<br>Paper based payroll records | Structured                  | Employees in receipt of Statutory Maternity Pay | Yes  | 6(1)(b) Performance of a contract to which the data subject is party<br>9(2)(b) Obligations under employment law | Name;<br>Date of Birth;<br>National Insurance Number;<br>Address;<br>Contact Details;<br>Salary Level;<br>Tax Code;<br>Statutory Maternity Pay payments received | Government Departments such as HMRC and / or DWP as required by statute | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None  | ICT System Access Controls and ICT Security Protocols applied.<br>Hard copy files securely stored and access restricted to relevant staff. | 5 years  |          |
| 12.07.06 | Maintenance of pension files for each member of the Local Government Pension Scheme administered by CEC | All records associated with the provision of LGPS membership for employees who contribute to the :Lothian Pension Fund. | ICT System: iTrent<br>Paper based pension records | Structured                  | Employees;<br>LGPS Members                      | Yes  | 6(1)(b) Performance of a contract to which the data subject is party<br>9(2)(b) Obligations under employment law | Name;<br>Date of Birth;<br>National Insurance Number;<br>Address;<br>Contact Details;<br>Salary Level;<br>Tax Code;<br>Pensions Contributions;                   | Government Departments such as HMRC and / or DWP as required by statute | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None  | ICT System Access Controls and ICT Security Protocols applied.<br>Hard copy files securely stored and access restricted to relevant staff. | 10 years   |          |
| 12.07.07 | Pension Scheme Management records for the fund administered by CEC                                      | All management tasks undertaken in connection with the operation of the Lothian Pension Fund.                           | ICT System: iTrent<br>Paper based pension records | Structured                  | Employees;<br>LGPS Members                      | Yes  | 6(1)(b) Performance of a contract to which the data subject is party<br>9(2)(b) Obligations under employment law | Calculations of pensions liabilities;<br>Fund management of Lothian Pension Fund;<br>Lothian Pension Fund tenants and lease details                              | None  | None                                 | No  | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None   | ICT System Access Controls and ICT Security Protocols applied.<br>Hard copy files securely stored and access restricted to relevant staff. | 10 years |

**Section 13: Health and Safety**

Record of Processing Activities as required by Article 30 of the General Data Protection Regulation and Section 61 of the Data Protection Bill

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**Contact Details:** E-mail: information.compliance@edinburgh.gov.uk Telephone: 0131 469 6200

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|--|--|--|-----------------------------|-----------------------------|---|---|------------------------------------|---|--|---|-------------------------------|---|--|--|----------|
|  |  |  |                             |                             |   |   |                                    | Categories of Recipients of Disclosure (if any)   | Destination of Transfer of Data (if any)   | Subject to Automated Decision Making  | 3rd Party Data Processor Used | Joint Data Controller (if any)  | Technical & Organisational Measures taken to Protect Personal Data | Envisaged Time Limits for Erasure of Personal Information (See CEC Records Retention Schedule for further details) |          |
| <b>Part 1: Community safety</b>  |  |  |                             |                             |   |   |                                    |   |  |   |                               |   |  |  |          |
| See Section 3: Community Safety for personal data processing undertaken under this category of activity. |  |  |                             |                             |   |   |                                    |   |  |   |                               |   |  |  |          |
| <b>Part 2: Compliance</b>  |  |  |                             |                             |   |   |                                    |   |  |   |                               |   |  |  |          |
| 13.02.01   | Health & Safety Training Records   | Maintenance of records to evidence training completed by officers within the Council who have allocated health & safety responsibilities | ICT System: Council Network | Structured                  | Employees   | Name; Job Title; Contact Details; Record of training attended   | No                                 | 6(1)(c) Compliance with a legal obligation<br><br>Health & Safety at Work etc Act 1974  | None   | None  | No                            | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None   | ICT System Access Controls and ICT Security Protocols applied.   | 7 years  |
| <b>Part 3: Monitoring</b>  |  |  |                             |                             |   |   |                                    |   |  |   |                               |   |  |  |          |
| 13.03.01   | Incident Recording and Reporting in respect of accidents involving adults  | Record of accident including information about person involved, witnesses and details of accident and effects.                           | ICT System: SHE Assure      | Structured                  | Adult involved in an accident within a council premises; Witnesses to accident  | Name; Date of Birth; Address; Contact Details; Health Information; Details of accident                              | Yes                                | 6(1)(c) Compliance with a legal obligation<br><br>Health & Safety at Work etc Act 1974<br><br>9(2)(b) Social protection legal obligations | Name; Date of Birth; Address; Contact Details; Health Information; Details of accident                         | Accident information shared with Health & safety Executive (HSE) as required by legislation | No                            | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None   | ICT System Access Controls and ICT Security Protocols applied.   | 7 years  |
| 13.03.02   | Incident Recording and Reporting in respect of accidents involving children  | Record of accident including information about person involved, witnesses and details of accident and effects.                           | ICT System: SHE Assure      | Structured                  | Child involved in an accident within a council premises; Witnesses to accident  | Name; Date of Birth; Address; Contact Details; Parent / Guardian name; Health information; Details of accident      | Yes                                | 6(1)(c) Compliance with a legal obligation<br><br>Health & Safety at Work etc Act 1974<br><br>9(2)(b) Social protection legal obligations | Name; Date of Birth; Address; Contact Details; Parent / Guardian name; Health information; Details of accident | Accident information shared with Health & safety Executive (HSE) as required by legislation | No                            | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None   | ICT System Access Controls and ICT Security Protocols applied.   | 25 years |
| 13.03.03   | Records of Health & Safety Audits Undertaken by Health & Safety team   | Record of audit findings and recommendations.  | ICT System: SHE Assure      | Structured                  | People involved in an accident within a council premises; Witnesses to accident | Name; Date of Birth; Address; Contact Details; Details of audit findings  | Yes                                | 6(1)(c) Compliance with a legal obligation<br><br>Health & Safety at Work etc Act 1974<br><br>9(2)(b) Social protection legal obligations | Name; Date of Birth; Address; Contact Details; Parent / Guardian name; Health information; Details of accident | Accident information shared with Health & safety Executive (HSE) as required by legislation | No                            | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None   | ICT System Access Controls and ICT Security Protocols applied.   | 7 years  |
| 13.03.04   | Records of Health Surveillance by Occupational Health providing in order that appropriate Health & Safety measures can be implemented.           | Record of health surveillance process and assessed outcomes  | ICT System: SHE Assure      | Structured                  | People involved in an accident within a council premises; Witnesses to accident | Name; Date of Birth; Address; Contact Details; Health information;  | Yes                                | 6(1)(c) Compliance with a legal obligation<br><br>Health & Safety at Work etc Act 1974<br><br>9(2)(b) Social protection legal obligations | Name; Date of Birth; Address; Contact Details; Parent / Guardian name; Health information; Details of accident | Accident information shared with Health & safety Executive (HSE) as required by legislation | No                            | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None   | ICT System Access Controls and ICT Security Protocols applied.   | 7 years  |
| 13.03.05   | Records of Workplace Assessments undertaken across CEC, including the capture of monitoring information by authorised equipment and IT packages. | Record of assessment findings and recommendations.   | ICT System: SHE Assure      | Structured                  | Employees; Contractors  | Name; Date of Birth; Address; Contact Details; Details of assessment findings; Records of H&S monitoring undertaken | Yes                                | 6(1)(c) Compliance with a legal obligation<br><br>Health & Safety at Work etc Act 1974<br><br>9(2)(b) Social protection legal obligations | Name; Date of Birth; Address; Contact Details; Parent / Guardian name; Health information; Details of accident | Accident information shared with Health & safety Executive (HSE) as required by legislation | No                            | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None   | ICT System Access Controls and ICT Security Protocols applied.   | 7 years  |

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|---|---|--|---|-----------------------------|-----------------------------|---|------------------------------------|---|---|---|--|---|--|--|---------|
|   |   |  |   |                             |                             |   |                                    | Categories of Recipients of Disclosure (if any)   | Destination of Transfer of Data (if any)  | Subject to Automated Decision Making  | 3rd Party Data Processor Used  | Joint Data Controller (if any)  | Technical & Organisational Measures taken to Protect Personal Data | Envisaged Time Limits for Erasure of Personal Information (See CEC Records Retention Schedule for further details)                             |         |
| <b>Part 4: Risk management</b>  |   |  |   |                             |                             |   |                                    |   |   |   |  |   |  |  |         |
| No processing of personal data takes place under this category of activity. |   |  |   |                             |                             |   |                                    |   |   |   |  |   |  |  |         |
| <b>Section 14: Housing</b>  |   |  |   |                             |                             |   |                                    |   |   |   |  |   |  |  |         |
| <b>Part 1: Housing allocation</b>   |   |  |   |                             |                             |   |                                    |   |   |   |  |   |  |  |         |
| 14.01.01  | Processing of Community Housing Register (CHR) applications   | Applications for social housing made to the Council and Registered Social Landlords in Edinburgh via EdIndex, the Common Housing Register.           | ICT System: iWorld<br>Paper based housing records | Structured                  | Applicants                  | Name;<br>Date of Birth;<br>Address;<br>Contact Details;<br>Household Composition;<br>Health and other accessibility needs;<br>Housing requirements;<br>Area preference;<br>Salary and other financial information | Yes                                | 6(1)(e) Official Authority vested in the controller (arising from various Housing legislation)<br><br>9(2)(h) Social care and social protection obligations | Name;<br>Date of Birth;<br>Address;<br>Contact Details;<br>Household Composition;<br>Health and other accessibility needs;<br>Housing requirements;<br>Area preference;<br>Salary and other financial information | EdIndex Members including various Registered Social Housing Associations  | Not subject to automated decision making.<br><br>The council uses automation software for aspects of this processing | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None   | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 1 year  |
| 14.01.02  | Managing housing exchanges via the mutual exchange scheme   | Managing the exchange of tenancies between two social housing tenants to include the termination of one tenancy and the setting up of another.       | ICT System: iWorld<br>Paper based housing records | Structured                  | Applicants                  | Name;<br>Date of Birth;<br>Address;<br>Contact Details;<br>Household Composition;<br>Health and other accessibility needs;<br>Housing requirements;<br>Area preference;<br>Salary and other financial information | Yes                                | 6(1)(e) Official Authority vested in the controller (arising from various Housing legislation)<br><br>9(2)(h) Social care and social protection obligations | Name;<br>Date of Birth;<br>Address;<br>Contact Details;<br>Household Composition;<br>Health and other accessibility needs;<br>Housing requirements;<br>Area preference;<br>Salary and other financial information | Social Landlord of other tenancy involved in exchange (if not CEC)  | No   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None   | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 1 year  |
| 14.01.03  | Dealing with homelessness including applications for accommodation for homeless people and for advice and support on housing options and needs. | All records about services provided to homelessness applicants including temporary accommodation provision and advice and support services provided. | ICT System: iWorld<br>Paper based housing records | Structured                  | Homeless Applicants         | Name;<br>Date of Birth;<br>Address;<br>Contact Details;<br>Household Composition;<br>Health and other accessibility needs;<br>Housing requirements;<br>Area preference;<br>Salary and other financial information | Yes                                | 6(1)(e) Official Authority vested in the controller (arising from various Housing legislation)<br><br>9(2)(h) Social care and social protection obligations | Name;<br>Date of Birth;<br>Address;<br>Contact Details;<br>Household Composition;<br>Health and other accessibility needs;<br>Housing requirements;<br>Area preference;<br>Salary and other financial information | Temporary Accommodation provider and other statutory, voluntary and private agencies involved in providing advice and support services. | No   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None   | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 5 years |
| 14.01.04  | Management of homeless accommodation and support provision  | All records about temporary accommodation provision, including inspection and payment records.   | ICT System: iWorld<br>Paper based housing records | Structured                  | Service Users;<br>Employees | Name;<br>Date of Birth;<br>Address;<br>Contact Details;<br>Support provision;<br>Payment details  | Yes                                | 6(1)(e) Official Authority vested in the controller (arising from various Housing legislation)<br><br>9(2)(h) Social care and social protection obligations | Name;<br>Date of Birth;<br>Address;<br>Contact Details;<br>Support provision;<br>Payment details  | Temporary Accommodation provider and other statutory, voluntary and private agencies involved in providing advice and support services. | No   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None   | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 5 years |

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|-----------------------------------|---|---|---|------------|---|---|--|---|---|---|--------------------------------------|---|--------------------------------|--|--|
|                                   |   |   |   |            |   |   |  |   | Categories of Recipients of Disclosure (if any)   | Destination of Transfer of Data (if any)  | Subject to Automated Decision Making | 3rd Party Data Processor Used   | Joint Data Controller (if any) | Technical & Organisational Measures taken to Protect Personal Data   | Envisaged Time Limits for Erasure of Personal Information (See CEC Records Retention Schedule for further details) |
| 14.01.05                          | Processing of information about applicants for housing to fulfil the Councils obligations under the National Accommodation Strategy for Sex Offenders | Performance of Landlord Link Officer role in exchanging information, liaising with Social Work and Partner Agencies in respect of the management and monitoring of risks.   | ICT System: iWorld<br>Paper based housing records | Structured | Individuals managed under SAVOLO arrangements | Name;<br>Date of Birth;<br>Address;<br>Contact Details;<br>Housing Needs;<br>Social Background Information;<br>Offending history and current risk assessment;<br>Health Information;<br>Records of Social Work Contacts;<br>Care Plan | Yes  | 6(1)(e) Official Authority vested in the controller (arising from Scottish Governance Strategy)<br><br>9(2)(h) Provision of social care | Name;<br>Date of Birth;<br>Address;<br>Contact Details;<br>Housing Needs;<br>Social Background Information;<br>Offending history and current risk assessment;<br>Health Information;<br>Records of Social Work Contacts;<br>Care Plan | Other Statutory Agencies including Police Scotland and NHS Lothian, Housing Providers and 3rd Sector Support Agencies involved in delivering support plan | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 5 years  |
| <b>Part 2: Housing stock</b>      |   |   |   |            |   |   |  |   |   |   |                                      |   |                                |  |  |
| 14.02.01                          | Processing of requests from tenants for responsive repairs to housing stock   | All records about requests for responsive repairs made by tenants and the work undertaken to resolve these.   | ICT System: iWorld<br>Paper based housing records | Structured | Tenants                                       | Name;<br>Address;<br>Contact Details;<br>Details of repair  | No   | 6(1)(b) Performance of a contract to which the data subject is party  | Name;<br>Address;<br>Contact Details;<br>Details of repair  | Contractors engaged to attend to allocated repairs  | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 5 years  |
| 14.02.02                          | Manging a programme of planned repairs and improvements to council housing stock  | All records about planned repairs and improvements undertaken in respect of the councils housing stock.   | ICT System: iWorld<br>Paper based housing records | Structured | Tenants                                       | Name;<br>Address;<br>Contact Details;<br>Details of repair  | No   | 6(1)(b) Performance of a contract to which the data subject is party  | Name;<br>Address;<br>Contact Details;<br>Details of improvement / repair  | Contractors engaged to attend to allocated improvements / repairs   | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 5 years  |
| <b>Part 3: Managing tenancies</b> |   |   |   |            |   |   |  |   |   |   |                                      |   |                                |  |  |
| 14.03.01                          | Tenancy records for CEC Housing Tenants   | All records associated with tenancies held in connection with CEC Housing stock including tenancy agreements, rent payments and rent management and all other tenancy matters   | ICT System: iWorld<br>Paper based housing records | Structured | Tenants                                       | Name;<br>Address;<br>Contact Details;<br>Tenancy Agreement;<br>Household composition;<br>Rent level and rent payments;  | No   | 6(1)(b) Performance of a contract to which the data subject is party  | None  | None  | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 25 years   |
| 14.03.02                          | Supporting tenants  | All records associated with support services provided to tenants including housing support services, care and welfare services, complaints handling, conflict resolution, customer service matters and all other tenancy support matters. | ICT System: iWorld<br>Paper based housing records | Structured | Tenants                                       | Name;<br>Address;<br>Contact Details;<br>Support needs and support plans;<br>Complaints and conflict resolution details;  | No   | 6(1)(b) Performance of a contract to which the data subject is party  | None  | None  | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 5 years  |



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|----------------------------------|--|--|---|------------|------------------------------|---|--|--|---|---|--------------------------------------|---|--------------------------------|--|--|
|                                  |  |  |   |            |                              |   |  |  | Categories of Recipients of Disclosure (if any)   | Destination of Transfer of Data (if any)  | Subject to Automated Decision Making | 3rd Party Data Processor Used   | Joint Data Controller (if any) | Technical & Organisational Measures taken to Protect Personal Data   | Envisaged Time Limits for Erasure of Personal Information (See CEC Records Retention Schedule for further details) |
| 14.03.03                         | Tenant consultation and participation  | All records associated with consultation undertaken with tenants and about tenant participation activities   | ICT System: iWorld<br>Paper based housing records     | Structured | Tenants                      | Name;<br>Address;<br>Contact Details;<br>Consultation and participation inputs                              | No   | 6(1)(e) Official Authority vested in the controller (arising from various Housing legislation) | None  | None  | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 5 years  |
| <b>Part 4: Enforcement</b>       |  |  |   |            |                              |   |  |  |   |   |                                      |   |                                |  |  |
| 14.04.01                         | Maintenance of register of landlords operating in Edinburgh.                 | All records relating to the registration of private landlords operating within Edinburgh   | ICT System: iWorld<br>Paper based application records | Structured | Landlords                    | Name;<br>Address;<br>Contact Details;<br>Application for Registration as a Landlord;                        | No   | 6(1)(e) Official Authority vested in the controller (arising from various Housing legislation) | Name;<br>Address;<br>Contact Details;<br>Landlord Registration Number                                       | Information publicly available on internet.   | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 6 years  |
| 14.04.02                         | Processing of applications for Houses in Multiple Occupation (HMO) Licensing | Processing of applications received for HMO Licensing, including inspections undertaken, and advising the applicant if their application is accepted or rejected. Also including issuing HMO Licenses to successful applicants | ICT System: iWorld<br>Paper based application records | Structured | Applicants for HMO Licenses  | Name;<br>Address;<br>Contact Details;<br>Date of Birth;<br>Application for HMO License;<br>Property details | No   | 6(1)(e) Official Authority vested in the controller (arising from various Housing legislation) | Name;<br>Address;<br>Contact Details;<br>Date of Birth;<br>Application for HMO License;<br>Property details | Other Statutory Agencies including Police Scotland and the Scottish Fire & Rescue Service as consultees on HMO application. | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 6 years  |
| <b>Part 5: Estate management</b> |  |  |   |            |                              |   |  |  |   |   |                                      |   |                                |  |  |
| 14.05.01                         | Processing of applications for Garage Rentals                                | Processing of applications received for garage rentals managed by the Council and advising the applicant if their application is accepted or rejected.   | ICT System: iWorld<br>Paper based application records | Structured | Applicants for garage rental | Name;<br>Address;<br>Contact Details;<br>Garage rental Application Details                                  | No   | 6(1)(e) Official Authority vested in the controller (arising from various Housing legislation) | None  | None  | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 2 years  |
| 14.05.02                         | Maintenance of allotment plot holder records                                 | Records of garage rental lease holders including payment details.  | ICT System: iWorld<br>Paper based allotment records   | Structured | Garage rental lease holders  | Name;<br>Address;<br>Contact Details;<br>Garage Rental Details;<br>Payment Details                          | No   | 6(1)(e) Official Authority vested in the controller (arising from various Housing legislation) | None  | None  | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 2 years  |
| 14.05.03                         | Operation of stair cleaning service  | Records of customers of stair cleaning service including payment details.  | ICT System: iWorld<br>Paper based allotment records   | Structured | Customers                    | Name;<br>Address;<br>Contact Details;<br>Garage Rental Details;<br>Payment Details                          | No   | 6(1)(b) Performance of a contract to which the data subject is party                           | None  | None  | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 2 years  |

Record of Processing Activities as required by Article 30 of the General Data Protection Regulation and Section 61 of the Data Protection Bill

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**Contact Details:** E-mail: information.compliance@edinburgh.gov.uk Telephone: 0131 469 6200

**Date Updated:** 09/02/2021  
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|--|---|---|--|-----------------------------|---|--|------------------------------------|--|---|---|--|---|--|--|---|
|  |   |   |  |                             |   |  |                                    | Categories of Recipients of Disclosure (if any)  | Destination of Transfer of Data (if any)  | Subject to Automated Decision Making  | 3rd Party Data Processor Used  | Joint Data Controller (if any)  | Technical & Organisational Measures taken to Protect Personal Data | Envisaged Time Limits for Erasure of Personal Information (See CEC Records Retention Schedule for further details)                         |   |
| <b>Section 15: Human Resources</b>     |   |   |  |                             |   |  |                                    |  |   |   |  |   |  |  |   |
| <b>Part 1: Administering employees</b> |   |   |  |                             |   |  |                                    |  |   |   |  |   |  |  |   |
| 15.01.01                               | Monitoring employee absence   | Records of managers monitoring of employees absence in line with the CEC Absence Management procedure | ICT System: iTrent<br>Paper based employee records | Structured                  | Employees   | Name;<br>Job Title;<br>Absence Periods;<br>Reason for Absence;<br>Occupational Health reports  | Yes                                | 6(1)(b) Performance of a contract to which the data subject is party<br>9(2)(b) Obligations under employment law | None  | None  | No   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None   | ICT System Access Controls and ICT Security Protocols applied.<br>Hard copy files securely stored and access restricted to relevant staff. | 3 years   |
| 15.01.02                               | Managing employee disciplinary processes  | Records of disciplinary matters considered under the CEC Disciplinary Procedure                       | ICT System: iTrent<br>Paper based employee records | Structured                  | Employees subject to disciplinary investigation / process | Name;<br>Job Title;<br>Summary of Allegations;<br>Disciplinary Investigation Report and Statements;<br>Details of Disciplinary Hearing, including outcome letter;<br>Details of Appeal (if made) | Yes                                | 6(1)(b) Performance of a contract to which the data subject is party<br>9(2)(b) Obligations under employment law | Name;<br>Job Title;<br>Summary of Allegations;<br>Details of Disciplinary Hearing, including outcome letter;<br>Details of Appeal (if made) | CEC has a statutory obligation to share information about employee disciplinary matters with regulators such as the General Teaching Council of Scotland (GTCS) and the Scottish Social Services Council (SSSC) | No   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None   | ICT System Access Controls and ICT Security Protocols applied.<br>Hard copy files securely stored and access restricted to relevant staff. | 6 years / 50 years (if accusation involves children or vulnerable adults) |
| 15.01.03                               | Managing employee grievance processes   | Records of grievances considered under the CEC Grievance procedure                                    | ICT System: iTrent<br>Paper based employee records | Structured                  | Employees involved in grievance processes                 | Name;<br>Job Title;<br>Summary of Grievance;<br>Grievance Investigation Report and Statements;<br>Details of Grievance Hearing, including outcome letter;<br>Details of Appeal (if made)         | Yes                                | 6(1)(b) Performance of a contract to which the data subject is party<br>9(2)(b) Obligations under employment law | None  | None  | No   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None   | ICT System Access Controls and ICT Security Protocols applied.<br>Hard copy files securely stored and access restricted to relevant staff. | 6 years   |
| 15.01.04                               | Managing employee maternity / adoption / paternity leave, partner support leave and shared parental leave | Records of maternity / adoption / paternity leave taken by CEC employees                              | ICT System: iTrent<br>Paper based employee records | Structured                  | Employees   | Name;<br>Job Title;<br>Leave Periods;<br>Keeping in Touch Days;<br>Return to Work arrangements   | Yes                                | 6(1)(b) Performance of a contract to which the data subject is party<br>9(2)(b) Obligations under employment law | None  | None  | No   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None   | ICT System Access Controls and ICT Security Protocols applied.<br>Hard copy files securely stored and access restricted to relevant staff. | 5 years / 18 years (if child is disabled)                                 |
| 15.01.05                               | Managing employee leave records   | Records of leave taken by CEC employees including Annual Leave, Flexi Leave and Special Leave.        | ICT System: iTrent<br>Paper based employee records | Structured                  | Employees   | Name;<br>Job Title;<br>Leave Periods including reason for leave;   | No                                 | 6(1)(b) Performance of a contract to which the data subject is party   | None  | None  | Not subject to automated decision making.<br>The council uses automation software for aspects of this processing | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None   | ICT System Access Controls and ICT Security Protocols applied.<br>Hard copy files securely stored and access restricted to relevant staff. | 2 years   |

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|---|--|---|--------------------|------------|--|---|--|--|---|--|--|---|--------------------------------|--|--|
|   |  |   |                    |            |  |   |  |  | Categories of Recipients of Disclosure (if any) | Destination of Transfer of Data (if any) | Subject to Automated Decision Making   | 3rd Party Data Processor Used   | Joint Data Controller (if any) | Technical & Organisational Measures taken to Protect Personal Data   | Envisaged Time Limits for Erasure of Personal Information (See CEC Records Retention Schedule for further details) |
| 15.01.06  | Recording employee personal details in employee file   | Maintenance of employee personal files in respect of their employment with CEC including employment contract arrangements and all HR records.   | ICT System: iTrent | Structured | Employees  | Name; Job Title; Address; Contact Details; Emergency Contact Details; Equality Monitoring Information; Details of any HR processes relating to the data subject; Appraisals and performance management records; Termination of Employment details | Yes  | 6(1)(b) Performance of a contract to which the data subject is party<br>9(2)(b) Obligations under employment law | None  | None                                     | Not subject to automated decision making.<br>The council uses automation software for aspects of this processing | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br>Hard copy files securely stored and access restricted to relevant staff. | 6 years / 50 years (if post subject to disclosure checks)  |
| 15.01.07  | Records of Disclosure Checks undertaken on staff in posts which are subject to disclosure checking | Checking of Disclosure Certificates for employees in posts which are subject to Disclosure checking.  | ICT System: iTrent | Structured | Employees who are subject to Disclosure Checking | Disclosure Scotland certificate   | Yes  | 6(1)(b) Performance of a contract to which the data subject is party<br>9(2)(b) Obligations under employment law | None  | None                                     | No   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br>Hard copy files securely stored and access restricted to relevant staff. | 90 days  |
| 15.01.08  | Records of quality assurance and prevention of fraud checks undertaken in respect of staff         | Processing of necessary checks to provide assurance and fraud prevention measures   | ICT System: iTrent | Structured | Employees  | Name; Payroll Number; Bank account details;   | Yes  | 6(1)(b) Performance of a contract to which the data subject is party<br>9(2)(b) Obligations under employment law | None  | None                                     | No   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br>Hard copy files securely stored and access restricted to relevant staff. | 5 years  |
| <b>Part 2: Employee relations</b>   |  |   |                    |            |  |   |  |  |   |  |  |   |                                |  |  |
| No processing of personal data takes place under this category of activity. |  |   |                    |            |  |   |  |  |   |  |  |   |                                |  |  |
| <b>Part 3: Equal opportunities</b>  |  |   |                    |            |  |   |  |  |   |  |  |   |                                |  |  |
| No processing of personal data takes place under this category of activity. |  |   |                    |            |  |   |  |  |   |  |  |   |                                |  |  |
| <b>Part 4: Monitoring employees</b>   |  |   |                    |            |  |   |  |  |   |  |  |   |                                |  |  |
| 15.04.01  | Performance Appraisal  | Records of People Performance processes including looking back and looking ahead conversations, on-going supervision / 1-2-1 conversations and other performance appraisal processes. | ICT System: iTrent | Structured | Employees  | Name; Job Title; Performance Appraisal  | No   | 6(1)(b) Performance of a contract to which the data subject is party   | None  | None                                     | No   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br>Hard copy files securely stored and access restricted to relevant staff. | 5 years  |

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|------------------------------------|---|---|---|------------|-----------------------------|--|--|--|---|--|--------------------------------------|---|--------------------------------|--|--|
|                                    |   |   |   |            |                             |  |  |  | Categories of Recipients of Disclosure (if any) | Destination of Transfer of Data (if any) | Subject to Automated Decision Making | 3rd Party Data Processor Used   | Joint Data Controller (if any) | Technical & Organisational Measures taken to Protect Personal Data   | Envisaged Time Limits for Erasure of Personal Information (See CEC Records Retention Schedule for further details) |
| 15.04.02                           | Employee Time Recording Records   | Records of time recording including flexi sheets, time recording system records, overtime records and staff rotas and all other tools used to record staff working time.          | ICT System: iTrent  | Structured | Employees                   | Name; Job Title; Working Time  | No   | 6(1)(b) Performance of a contract to which the data subject is party   | None  | None                                     | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br>Hard copy files securely stored and access restricted to relevant staff. | 2 years  |
| <b>Part 5: Occupational health</b> |   |   |   |            |                             |  |  |  |   |  |                                      |   |                                |  |  |
| 15.05.01                           | Occupational Health Case File   | Case file maintained by Occupational Health in respect of Occupational Health assessments and treatment of an employee  | ICT System: External Occupational Healthcare provider<br>Paper based case files | Structured | Employees; Former Employees | Name; Job Title; Referral to Occupational Health; Occupational Health records  | Yes  | 6(1)(b) Performance of a contract to which the data subject is party<br>9(2)(h) Occupational medicine            | None  | None                                     | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br>Hard copy files securely stored and access restricted to relevant staff. | 75 years   |
| 15.05.02                           | Personal Risk Assessments   | Details of personal risk assessments undertaken for individual employees including identified risks and ways in which those risks will be managed by the Council and the employee | ICT System: External Occupational Healthcare provider<br>Paper based case files | Structured | Employees                   | Name; Job Title; Risk Assessment; Action Plan  | Yes  | 6(1)(b) Performance of a contract to which the data subject is party<br>9(2)(h) Occupational medicine            | None  | None                                     | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br>Hard copy files securely stored and access restricted to relevant staff. | 6 years  |
| <b>Part 6: Recruitment</b>         |   |   |   |            |                             |  |  |  |   |  |                                      |   |                                |  |  |
| 15.06.01                           | Records of a recruitment process relating to the successful candidate             | Records containing key vacancy paperwork, job description, person specification and application form.   | ICT System: Talentlink<br>Paper based employee records                          | Structured | Employees                   | Name; Date of Birth; Equality Monitoring Information; Work History; Education and Training details; References; Health information | Yes  | 6(1)(b) Performance of a contract to which the data subject is party<br>9(2)(b) Obligations under employment law | None  | None                                     | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br>Hard copy files securely stored and access restricted to relevant staff. | 6 months   |
| 15.06.02                           | Records of a recruitment process relating to unsuccessful or withdrawn candidates | Records containing key vacancy paperwork, job description, person specification and application form.   | ICT System: Talentlink<br>Paper based employee records                          | Structured | Applicants for Employment   | Name; Date of Birth; Equality Monitoring Information; Work History; Education and Training details; References; Health information | Yes  | 6(1)(b) Performance of a contract to which the data subject is party<br>9(2)(b) Obligations under employment law | None  | None                                     | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br>Hard copy files securely stored and access restricted to relevant staff. | 6 months   |
| 15.06.03                           | Records of secondments  | Records containing secondment paperwork, job description, person specification and secondment application forms and secondment agreement  | ICT System: iTrent<br>Paper based employee records                              | Structured | Employees                   | Name; Date of Birth; Equality Monitoring Information; Work History; Education and Training details; References; Health information | Yes  | 6(1)(b) Performance of a contract to which the data subject is party<br>9(2)(b) Obligations under employment law | None  | None                                     | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br>Hard copy files securely stored and access restricted to relevant staff. | 6 years  |

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|---|---|---|--|------------|-----------------------------|---|--|--|---|--|--------------------------------------|---|--------------------------------|--|--|
|   |   |   |  |            |                             |   |  |  | Categories of Recipients of Disclosure (if any) | Destination of Transfer of Data (if any) | Subject to Automated Decision Making | 3rd Party Data Processor Used   | Joint Data Controller (if any) | Technical & Organisational Measures taken to Protect Personal Data   | Envisaged Time Limits for Erasure of Personal Information (See CEC Records Retention Schedule for further details) |
| 15.06.04  | Records of new start processes  | Records of new start paperwork completed by new employees   | ICT System: iTrent<br>Paper based employee records | Structured | Employees                   | Name; Job Title ; Completed New Start Checklist   | Yes  | 6(1)(b) Performance of a contract to which the data subject is party<br>9(2)(b) Obligations under employment law | None  | None                                     | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br>Hard copy files securely stored and access restricted to relevant staff. | 5 years  |
| 15.06.05  | Managing the recruitment of volunteers                                    | Records containing voluntary role paperwork, role description, person specification and volunteer application forms and volunteer agreement   | ICT System: iTrent<br>Paper based employee records | Structured | Volunteers                  | Name; Date of Birth; Equality Monitoring Information; Work History; Education and Training details; References; Health information                    | Yes  | 6(1)(b) Performance of a contract to which the data subject is party<br>9(2)(b) Obligations under employment law | None  | None                                     | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br>Hard copy files securely stored and access restricted to relevant staff. | 6 years  |
| <b>Part 7: Terms and conditions of employment</b> |   |   |  |            |                             |   |  |  |   |  |                                      |   |                                |  |  |
| 15.07.01  | Records of requests to make changes to terms and conditions of employment | Records of all requests received from employees for changes to contractual arrangements including hours of work, career breaks and maternity and paternity leave.   | ICT System: iTrent<br>Paper based employee records | Structured | Employees                   | Name; Job Title; Contract change request; Determination of request; Contract variation paperwork  | Yes  | 6(1)(b) Performance of a contract to which the data subject is party<br>9(2)(b) Obligations under employment law | None  | None                                     | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br>Hard copy files securely stored and access restricted to relevant staff. | 6 years  |
| 15.07.02  | Employee Benefits   | Records of all applications from employees to access employee benefits and delivery of these.   | ICT System: iTrent<br>Paper based employee records | Structured | Employees                   | Name; Job Title; Application details; Contract variation paperwork  | Yes  | 6(1)(b) Performance of a contract to which the data subject is party<br>9(2)(b) Obligations under employment law | None  | None                                     | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br>Hard copy files securely stored and access restricted to relevant staff. | 6 years  |
| <b>Part 8: Training</b>                           |   |   |  |            |                             |   |  |  |   |  |                                      |   |                                |  |  |
| 15.08.01  | Provision of training opportunities                                       | Planning and delivery of training, including in-persons, online and virtual events. Records detailing training needs and training attended by employees including induction training, online and internal training courses and training funded by the employer. | ICT System: iTrent<br>Paper based employee records | Structured | Employees                   | Name; Job Title; Training needs; Training attended; Cost authorisations; Contract of commitment (if needed); Proof of enrolment on course (if needed) | Yes  | 6(1)(b) Performance of a contract to which the data subject is party<br>9(2)(b) Obligations under employment law | None  | None                                     | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br>Hard copy files securely stored and access restricted to relevant staff. | 6 years / 50 years (if related to work with children or vulnerable adults)   |
| <b>Part 9: Workforce planning</b>                 |   |   |  |            |                             |   |  |  |   |  |                                      |   |                                |  |  |

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|---|---|---|--|-----------------------------|-------------------------------|--|------------------------------------|---|--|--------------------------------------|-------------------------------|---|--|--|----------|
|   |   |   |  |                             |                               |  |                                    | Categories of Recipients of Disclosure (if any)   | Destination of Transfer of Data (if any) | Subject to Automated Decision Making | 3rd Party Data Processor Used | Joint Data Controller (if any)  | Technical & Organisational Measures taken to Protect Personal Data | Envisaged Time Limits for Erasure of Personal Information (See CEC Records Retention Schedule for further details)                         |          |
| No processing of personal data takes place under this category of activity. |   |   |  |                             |                               |  |                                    |   |  |                                      |                               |   |  |  |          |
| <b>Part 10: Job evaluation</b>  |   |   |  |                             |                               |  |                                    |   |  |                                      |                               |   |  |  |          |
| No processing of personal data takes place under this category of activity. |   |   |  |                             |                               |  |                                    |   |  |                                      |                               |   |  |  |          |
| <b>Section 16: Information and Communication Technology (ICT)</b>           |   |   |  |                             |                               |  |                                    |   |  |                                      |                               |   |  |  |          |
| <b>Part 1: ICT systems development</b>                                      |   |   |  |                             |                               |  |                                    |   |  |                                      |                               |   |  |  |          |
| No processing of personal data takes place under this category of activity. |   |   |  |                             |                               |  |                                    |   |  |                                      |                               |   |  |  |          |
| <b>Part 2: ICT systems security management</b>                              |   |   |  |                             |                               |  |                                    |   |  |                                      |                               |   |  |  |          |
| 16.02.01  | Recording name and contact details for Systems Owners for ICT Systems across CEC  | Record of Council Officer who has management responsibility for each ICT system operated by or on behalf of CEC | ICT System - Council Network                                   | Structured                  | Council Officers              | Name; Job Title; Work Contact Details  | No                                 | 6(1)(e) Official Authority vested in the controller (arising from various Information Management legislation) | None                                     | None                                 | No                            | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None   | ICT System Access Controls and ICT Security Protocols applied.   | 5 years  |
| 16.02.02  | Monitoring of access to and use of ICT systems  | Records of access gained to and use of ICT systems operated by or on behalf of CEC                              | ICT System - Council Network                                   | Structured                  | Council Officers              | Name; Job Title; Work Contact Details; ICT Access Information                | No                                 | 6(1)(e) Official Authority vested in the controller (arising from various Information Management legislation) | None                                     | None                                 | No                            | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None   | ICT System Access Controls and ICT Security Protocols applied.   | 1 year   |
| 16.02.03  | Records of ICT Security Investigations  | Records of investigations undertaken into specific ICT security incidents.                                      | ICT System - Council Network<br>Paper based investigation file | Structured                  | Council Officers              | Name; Job Title; Work Contact Details; Records of ICT Security Investigation | No                                 | 6(1)(e) Official Authority vested in the controller (arising from various Information Management legislation) | None                                     | None                                 | No                            | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None   | ICT System Access Controls and ICT Security Protocols applied.<br>Hard copy files securely stored and access restricted to relevant staff. | 10 years |
| 16.02.04  | Provision of internet security solutions for the CEC ICT estate via forward and reverse proxy system                    | Records of forward and reverse proxy systems  | ICT System - Council Network                                   | Structured                  | Council Officers              | Name; Job Title; Work Contact Details; ICT Access Information                | No                                 | 6(1)(e) Official Authority vested in the controller (arising from various Information Management legislation) | None                                     | None                                 | No                            | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None   | ICT System Access Controls and ICT Security Protocols applied.   | 1 year   |
| 16.02.05  | Processing of user name, IP address and user associated token for validation of identity in multi-factor identification | Records of validation of identity   | ICT System - Council Network                                   | Structured                  | Council Officers<br>Customers | Name; Job Title; IP address; User associated token                           | No                                 | 6(1)(e) Official Authority vested in the controller (arising from various Information Management legislation) | None                                     | None                                 | No                            | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None   | ICT System Access Controls and ICT Security Protocols applied.   | 1 year   |

Record of Processing Activities as required by Article 30 of the General Data Protection Regulation and Section 61 of the Data Protection Bill

**Data Controller** The City of Edinburgh Council, Waverley Court, 4 East Market Street, Edinburgh, EH8 8BG  
**Named Data Protection Officer:** Kevin Wilbraham, Information Governance Manager  
**Contact Details:** E-mail: information.compliance@edinburgh.gov.uk Telephone: 0131 469 6200

**Date Updated:** 09/02/2021  
**Scheduled Date of Next Review:** 01/03/2022  
**Version Number:** 2

| Ref   | Purpose of Processing   | Description of Processing   | Format of Data                    |            | Categories of Data Subjects | Categories of Personal Data                                       | Does Processing include Special Categories of Personal Data? | Lawfulness of Processing Condition  | Disclosure and Transfer                         |  | Processing Activities  |   |                                | Security and Disposal  |  |
|---|---|---|-----------------------------------|------------|-----------------------------|---|--|---|---|--|--|---|--------------------------------|--|--|
|   |   |   |                                   |            |                             |   |  |   | Categories of Recipients of Disclosure (if any) | Destination of Transfer of Data (if any) | Subject to Automated Decision Making   | 3rd Party Data Processor Used   | Joint Data Controller (if any) | Technical & Organisational Measures taken to Protect Personal Data | Envisaged Time Limits for Erasure of Personal Information (See CEC Records Retention Schedule for further details) |
| 16.02.06  | Processing staff name, employee number, e-mail address and user names to access ICT system and applications   | User access records   | ICT System - Council Network      | Structured | Council Officers            | Name; Job Title; Work Contact Details; Employee Number; User Name | No   | 6(1)(e) Official Authority vested in the controller (arising from various Information Management legislation)                                     | None  | None                                     | No   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.     | 1 year   |
| <b>Part 3: ICT systems operations management</b>                            |   |   |                                   |            |                             |   |  |   |   |  |  |   |                                |  |  |
| No processing of personal data takes place under this category of activity. |   |   |                                   |            |                             |   |  |   |   |  |  |   |                                |  |  |
| <b>Part 4: ICT systems user training and support</b>                        |   |   |                                   |            |                             |   |  |   |   |  |  |   |                                |  |  |
| No processing of personal data takes place under this category of activity. |   |   |                                   |            |                             |   |  |   |   |  |  |   |                                |  |  |
| <b>Section 17: Information Management</b>                                   |   |   |                                   |            |                             |   |  |   |   |  |  |   |                                |  |  |
| <b>Part 1: Access to information</b>  |   |   |                                   |            |                             |   |  |   |   |  |  |   |                                |  |  |
| 17.01.01  | Recording and responding to subject access requests made to CEC   | Providing access to personal data upon a data subjects request  | ICT System - AXLR8 and Sharepoint | Structured | All data subjects           | All categories of personal data                                   | Yes  | 6(1)(c) Legal Obligation<br>General Data Protection Regulation (GDPR) and Data Protection Act 2018<br>9(2)(b) Social Protection Legal Obligations | None  | None                                     | No   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.     | 3 years  |
| 17.01.02  | Recording and responding to data subjects requests for rectify, erase, restrict processing or enable data portability received from data subjects   | Providing access to personal data upon a data subjects request  | ICT System - AXLR8 and Sharepoint | Structured | All data subjects           | All categories of personal data                                   | Yes  | 6(1)(c) Legal Obligation<br>General Data Protection Regulation (GDPR) and Data Protection Act 2018<br>9(2)(b) Social Protection Legal Obligations | None  | None                                     | No   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.     | 3 years  |
| 17.01.03  | Recording and responding to requests for access to personal data received from someone other than the data subject or from an external organisation | Providing access, if necessary / appropriate to do so, to personal data about a named data subject upon the request of a external person or organisation. | ICT System - AXLR8 and Sharepoint | Structured | All data subjects           | All categories of personal data                                   | Yes  | 6(1)(c) Legal Obligation<br>General Data Protection Regulation (GDPR) and Data Protection Act 2018<br>9(2)(b) Social Protection Legal Obligations | None  | None                                     | No   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.     | 3 years  |
| 17.01.04  | Recording and responding to Freedom of Information requests made to CEC   | Providing access to council held information upon receipt of a valid request.   | ICT System - AXLR8 and Sharepoint | Structured | All data subjects           | Name; Address; Contact Details; Details of Request                | Yes  | 6(1)(c) Legal Obligation<br>Freedom of Information (Scotland) Act 2002<br>9(2)(b) Social Protection Legal Obligations                             | None  | None                                     | Not subject to automated decision making.<br>The council uses automation software for aspects of this processing | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.     | 3 years  |

Record of Processing Activities as required by Article 30 of the General Data Protection Regulation and Section 61 of the Data Protection Bill

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**Version Number:** 2

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|----------|--|--|-----------------------------------|------------|-----------------------------|--|--|--|---|--|--------------------------------------|---|--------------------------------|--|--|
|          |  |  |                                   |            |                             |  |  |  | Categories of Recipients of Disclosure (if any) | Destination of Transfer of Data (if any) | Subject to Automated Decision Making | 3rd Party Data Processor Used   | Joint Data Controller (if any) | Technical & Organisational Measures taken to Protect Personal Data | Envisaged Time Limits for Erasure of Personal Information (See CEC Records Retention Schedule for further details) |
| 17.01.05 | Recording and responding to Freedom of Information review requests made to CEC and responding to Scottish Information Commissioner Reviews of the Councils handling of an FOI request                      | Undertaking a review of the Council's handling of an FOI request and responding to the OSIC in respect of reviews. | ICT System - AXLR8 and Sharepoint | Structured | All data subjects           | Name; Address; Contact Details; Details of Request | Yes  | 6(1)(c) Legal Obligation<br><br>Freedom of Information (Scotland) Act 2002<br><br>9(2)(b) Social Protection Legal Obligations                        | None  | None                                     | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.     | 6 years  |
| 17.01.06 | Recording and responding to requests for environmental information made to CEC   | Providing access to council held environmental information upon receipt of a valid request.                        | ICT System - AXLR8 and Sharepoint | Structured | All data subjects           | Name; Address; Contact Details; Details of Request | Yes  | 6(1)(c) Legal Obligation<br><br>The Environmental Information (Scotland) Regulations SSI 2004/520<br><br>9(2)(b) Social Protection Legal Obligations | None  | None                                     | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.     | 3 years  |
| 17.01.07 | Recording and responding to reviews of requests for access to environmental information made to CEC and responding to Scottish Information Commissioner Reviews of the Councils handling of an EIR request | Undertaking a review of the Council's handling of an EIR request and responding to the OSIC in respect of reviews. | ICT System - AXLR8 and Sharepoint | Structured | All data subjects           | Name; Address; Contact Details; Details of Request | Yes  | 6(1)(c) Legal Obligation<br><br>The Environmental Information (Scotland) Regulations SSI 2004/520<br><br>9(2)(b) Social Protection Legal Obligations | None  | None                                     | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.     | 6 years  |

**Part 2: Archives**

See Section 19: Leisure & Culture for personal data processing undertaken under this category of activity.

**Part 3: Knowledge management**

No processing of personal data takes place under this category of activity.

**Part 4: Records Management**

No processing of personal data takes place under this category of activity.

**Part 5: Registration**

No processing of personal data takes place under this category of activity.

**Part 6: Compliance**



Record of Processing Activities as required by Article 30 of the General Data Protection Regulation and Section 61 of the Data Protection Bill

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|---|--|--|--|------------|-------------------------------|---|--|--|---|--|--------------------------------------|---|--------------------------------|--|--|
|   |  |  |  |            |                               |   |  |  | Categories of Recipients of Disclosure (if any) | Destination of Transfer of Data (if any) | Subject to Automated Decision Making | 3rd Party Data Processor Used   | Joint Data Controller (if any) | Technical & Organisational Measures taken to Protect Personal Data   | Envisaged Time Limits for Erasure of Personal Information (See CEC Records Retention Schedule for further details) |
| 17.06.01  | Management and reporting of data protection breaches                       | Internal reporting and management of reported data protection breaches including notifying data subjects and reporting to the ICO. | ICT System - Council Network                                   | Structured | All data subjects             | All categories of personal data   | Yes  | 6(1)(c) Legal Obligation<br><br>General Data Protection Regulation (GDPR) and Data Protection Act 2018<br><br>9(2)(b) Social Protection Legal Obligations  | None  | None                                     | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.   | 3 years  |
| <b>Section 18: Legal Services</b>   |  |  |  |            |                               |   |  |  |   |  |                                      |   |                                |  |  |
| <b>Part 1: Advice</b>   |  |  |  |            |                               |   |  |  |   |  |                                      |   |                                |  |  |
| 18.01.01  | Provision to legal advice to internal Council services                     | Provision of case specific legal advice following request from Council service   | ICT System: Council Network<br>Paper based legal files         | Structured | All data subjects             | All categories of personal data   | Yes  | 6(1)(e) Official Authority vested in the controller (arising from various Local Government legislation)<br><br>9(2)(h) Social care, social protection and employment obligations<br>OR<br>9(2)(f) For establishment, exercise or defence of legal claims | None  | None                                     | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 5 years except if have major archival value or involve expert opinion of counsel when they are retained germanely. |
| <b>Part 2: Bylaws</b>   |  |  |  |            |                               |   |  |  |   |  |                                      |   |                                |  |  |
| 18.02.01  | Record of enforcement action taken in respect of City of Edinburgh Bylaws. | Enforcement action taken in instances where a breach of a City of Edinburgh Bylaw is proven.                                       | ICT System: Council Network<br>Paper based enforcement records | Structured | Individual who breach a bylaw | Name;<br>Date of Birth;<br>Address;<br>Contact Details;<br>Enforcement action taken | No   | 6(1)(e) Official Authority vested in the controller (arising from various Local Government legislation)  | None  | None                                     | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 5 years except if have major archival value or involve expert opinion of counsel when they are retained germanely. |
| <b>Part 3: Land and highways</b>  |  |  |  |            |                               |   |  |  |   |  |                                      |   |                                |  |  |
| No processing of personal data takes place under this category of activity. |  |  |  |            |                               |   |  |  |   |  |                                      |   |                                |  |  |
| <b>Part 4: Land registration</b>  |  |  |  |            |                               |   |  |  |   |  |                                      |   |                                |  |  |
| No processing of personal data takes place under this category of activity. |  |  |  |            |                               |   |  |  |   |  |                                      |   |                                |  |  |
| <b>Part 5: Litigation</b>   |  |  |  |            |                               |   |  |  |   |  |                                      |   |                                |  |  |

Record of Processing Activities as required by Article 30 of the General Data Protection Regulation and Section 61 of the Data Protection Bill

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|----------|--|---|--------------------------------|-----------------------|-----------------------------|--|--|------------------------------------|---|--|--------------------------------------|-------------------------------|---|--|--|-----------|
|          |  |   |                                |                       |                             |  |  |                                    | Categories of Recipients of Disclosure (if any)   | Destination of Transfer of Data (if any)   | Subject to Automated Decision Making | 3rd Party Data Processor Used | Joint Data Controller (if any)  | Technical & Organisational Measures taken to Protect Personal Data | Envisaged Time Limits for Erasure of Personal Information (See CEC Records Retention Schedule for further details)                             |           |
| 18.05.01 | Conduction of litigation in respect of Anti Social Behaviour Cases   | All records relating to litigation action commenced or defended by the Council including court applications, legal advice, court papers and court judgements. | ICT System:<br>Council Network | Paper based case file | Structured                  | Applicant and/or defendant in litigation | Name;<br>Date of Birth;<br>Address;<br>Contact Details;<br>Case / Social History;<br>Details of litigation | Yes                                | 6(1)(e) Official Authority vested in the controller (arising from various Local Government legislation)<br><br>9(2)(f) For establishment, exercise or defence of legal claims | Name;<br>Date of Birth;<br>Address;<br>Contact Details;<br>Case / Social History;<br>Details of litigation | Scottish Court Service               | No                            | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None   | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 10 years  |
| 18.05.02 | Conduction of litigation in respect of Eviction actions  | All records relating to litigation action commenced or defended by the Council including court applications, legal advice, court papers and court judgements. | ICT System:<br>Council Network | Paper based case file | Structured                  | Applicant and/or defendant in litigation | Name;<br>Date of Birth;<br>Address;<br>Contact Details;<br>Case / Social History;<br>Details of litigation | Yes                                | 6(1)(e) Official Authority vested in the controller (arising from various Local Government legislation)<br><br>9(2)(f) For establishment, exercise or defence of legal claims | Name;<br>Date of Birth;<br>Address;<br>Contact Details;<br>Case / Social History;<br>Details of litigation | Scottish Court Service               | No                            | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None   | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 10 years  |
| 18.05.03 | Conduction of litigation in respect of Child Protection and Care actions including freeing for adoption, fostering and Child Protection Orders | All records relating to litigation action commenced or defended by the Council including court applications, legal advice, court papers and court judgements. | ICT System:<br>Council Network | Paper based case file | Structured                  | Applicant and/or defendant in litigation | Name;<br>Date of Birth;<br>Address;<br>Contact Details;<br>Case / Social History;<br>Details of litigation | Yes                                | 6(1)(e) Official Authority vested in the controller (arising from various Local Government legislation)<br><br>9(2)(f) For establishment, exercise or defence of legal claims | Name;<br>Date of Birth;<br>Address;<br>Contact Details;<br>Case / Social History;<br>Details of litigation | Scottish Court Service               | No                            | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None   | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 100 years |
| 18.05.04 | Conduction of litigation in respect of Employment Tribunal matters   | All records relating to litigation action commenced or defended by the Council including court applications, legal advice, court papers and court judgements. | ICT System:<br>Council Network | Paper based case file | Structured                  | Applicant and/or defendant in litigation | Name;<br>Date of Birth;<br>Address;<br>Contact Details;<br>Case / Social History;<br>Details of litigation | Yes                                | 6(1)(e) Official Authority vested in the controller (arising from various Local Government legislation)<br><br>9(2)(f) For establishment, exercise or defence of legal claims | Name;<br>Date of Birth;<br>Address;<br>Contact Details;<br>Case / Social History;<br>Details of litigation | Scottish Court Service               | No                            | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None   | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 10 years  |
| 18.05.05 | Conduction of litigation in respect of Mental Health and Capacity matters  | All records relating to litigation action commenced or defended by the Council including court applications, legal advice, court papers and court judgements. | ICT System:<br>Council Network | Paper based case file | Structured                  | Applicant and/or defendant in litigation | Name;<br>Date of Birth;<br>Address;<br>Contact Details;<br>Case / Social History;<br>Details of litigation | Yes                                | 6(1)(e) Official Authority vested in the controller (arising from various Local Government legislation)<br><br>9(2)(f) For establishment, exercise or defence of legal claims | Name;<br>Date of Birth;<br>Address;<br>Contact Details;<br>Case / Social History;<br>Details of litigation | Scottish Court Service               | No                            | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None   | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 10 years  |

Record of Processing Activities as required by Article 30 of the General Data Protection Regulation and Section 61 of the Data Protection Bill

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|----------|---|---|--|------------|--|--|--|---|--|--|--------------------------------------|---|--------------------------------|--|--|
|          |   |   |  |            |  |  |  |   | Categories of Recipients of Disclosure (if any)  | Destination of Transfer of Data (if any) | Subject to Automated Decision Making | 3rd Party Data Processor Used   | Joint Data Controller (if any) | Technical & Organisational Measures taken to Protect Personal Data   | Envisaged Time Limits for Erasure of Personal Information (See CEC Records Retention Schedule for further details) |
| 18.05.06 | Conduction of litigation in respect of any other civil action taken by CEC  | All records relating to litigation action commenced or defended by the Council including court applications, legal advice, court papers and court judgements. | ICT System: Council Network<br>Paper based case file | Structured | Applicant and/or defendant in litigation | Name;<br>Date of Birth;<br>Address;<br>Contact Details;<br>Case / Social History;<br>Details of litigation | Yes  | 6(1)(e) Official Authority vested in the controller (arising from various Local Government legislation)<br><br>9(2)(f) For establishment, exercise or defence of legal claims | Name;<br>Date of Birth;<br>Address;<br>Contact Details;<br>Case / Social History;<br>Details of litigation | Scottish Court Service                   | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 10 years   |
| 18.05.07 | Conduction of litigation in respect of Commercial matters including contract disputes and property disposal and acquisition matters | All records relating to litigation action commenced or defended by the Council including court applications, legal advice, court papers and court judgements. | ICT System: Council Network<br>Paper based case file | Structured | Applicant and/or defendant in litigation | Name;<br>Date of Birth;<br>Address;<br>Contact Details;<br>Case / Social History;<br>Details of litigation | Yes  | 6(1)(e) Official Authority vested in the controller (arising from various Local Government legislation)<br><br>9(2)(f) For establishment, exercise or defence of legal claims | Name;<br>Date of Birth;<br>Address;<br>Contact Details;<br>Case / Social History;<br>Details of litigation | Scottish Court Service                   | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 5 years  |
| 18.05.08 | Conduction of litigation in respect of Criminal Matters   | All records relating to litigation action commenced or defended by the Council including court applications, legal advice, court papers and court judgements. | ICT System: Council Network<br>Paper based case file | Structured | Applicant and/or defendant in litigation | Name;<br>Date of Birth;<br>Address;<br>Contact Details;<br>Case / Social History;<br>Details of litigation | Yes  | 6(1)(e) Official Authority vested in the controller (arising from various Local Government legislation)<br><br>9(2)(f) For establishment, exercise or defence of legal claims | Name;<br>Date of Birth;<br>Address;<br>Contact Details;<br>Case / Social History;<br>Details of litigation | Scottish Court Service                   | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 5 years  |
| 18.05.09 | Conduction of litigation in respect of Debt Recovery cases  | All records relating to litigation action commenced or defended by the Council including court applications, legal advice, court papers and court judgements. | ICT System: Council Network<br>Paper based case file | Structured | Applicant and/or defendant in litigation | Name;<br>Date of Birth;<br>Address;<br>Contact Details;<br>Case / Social History;<br>Details of litigation | Yes  | 6(1)(e) Official Authority vested in the controller (arising from various Local Government legislation)<br><br>9(2)(f) For establishment, exercise or defence of legal claims | Name;<br>Date of Birth;<br>Address;<br>Contact Details;<br>Case / Social History;<br>Details of litigation | Scottish Court Service                   | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 5 years  |

**Part 6: Management of legal activities**

No processing of personal data takes place under this category of activity.

**Part 7: Planning controls**

No processing of personal data takes place under this category of activity.

**Section 19: Leisure and Culture**

**Part 1: Allotments**

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|-------------------------|--|--|--|------------|---|---|--|--|---|--|--------------------------------------|---|--------------------------------|---|--|
|                         |  |  |  |            |   |   |  |  | Categories of Recipients of Disclosure (if any) | Destination of Transfer of Data (if any) | Subject to Automated Decision Making | 3rd Party Data Processor Used   | Joint Data Controller (if any) | Technical & Organisational Measures taken to Protect Personal Data  | Envisaged Time Limits for Erasure of Personal Information (See CEC Records Retention Schedule for further details) |
| 19.01.01                | Processing of applications for allotments                | Processing of applications received for allotment spaces managed by the Council and advising the applicant if their application is accepted or rejected. | ICT System: Council Network<br>Paper based records | Structured | Applicants for allotment space  | Name; Address; Contact Details; Allotment Application Details                 | No   | 6(1)(e) Official Authority vested in the controller (arising from various Public Space legislation)                  | None  | None                                     | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br>Hard copy files securely stored and access restricted to relevant staff.  | 1 year   |
| 19.01.02                | Maintenance of allotment plot holder records             | Records of allotment plot holders including payment details.   | ICT System: Council Network<br>Paper based records | Structured | Allotment plot holders  | Name; Address; Contact Details; Allotment Allocation Details; Payment Details | No   | 6(1)(e) Official Authority vested in the controller (arising from various Public Space legislation)                  | None  | None                                     | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br>Hard copy files securely stored and access restricted to relevant staff.  | 2 years  |
| <b>Part 2: Archives</b> |  |  |  |            |   |   |  |  |   |  |                                      |   |                                |   |  |
| 19.02.01                | Cataloguing archival holdings                            | Records of archival holdings and the archival holdings where they contain personal data  | ICT System: Council Network<br>Paper based records | Structured | Owners and donors of archival holdings; Subjects of archival holdings | Details of Archival Holding; Donors name and contact details (if appropriate) | No   | 6(1)(e) Official Authority vested in the controller (arising from various Local Government and Heritage legislation) | None  | None                                     | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br>Hard copy files securely stored and access restricted to relevant staff.<br>Archival holding held in secure storage within archive store or on suitable display with applicable security measures taken | 5 years following end of life of deposit   |
| 19.02.02                | Records of Loans from the City Archives to third parties | All records relating to loans of archival holdings made by the City Archive  | ICT System: Council Network<br>Paper based records | Structured | Loan Recipients   | Name; Address; Contact Details; Loan Agreement                                | No   | 6(1)(e) Official Authority vested in the controller (arising from various Local Government and Heritage legislation) | None  | None                                     | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br>Hard copy files securely stored and access restricted to relevant staff.  | 5 years  |
| 19.02.03                | Records of Loans to the City Archives from third parties | All records relating to loans of archival holdings made to the City Archive  | ICT System: Council Network<br>Paper based records | Structured | Individuals who make a loan to the Council                            | Name; Address; Contact Details; Loan Agreement                                | No   | 6(1)(e) Official Authority vested in the controller (arising from various Local Government and Heritage legislation) | None  | None                                     | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br>Hard copy files securely stored and access restricted to relevant staff.  | 5 years  |

Record of Processing Activities as required by Article 30 of the General Data Protection Regulation and Section 61 of the Data Protection Bill

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**Contact Details:** E-mail: information.compliance@edinburgh.gov.uk Telephone: 0131 469 6200

**Date Updated:** 09/02/2021  
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|---|---|--|--|------------|--|---|--|--|---|--|--------------------------------------|---|--------------------------------|--|--|
|   |   |  |  |            |  |   |  |  | Categories of Recipients of Disclosure (if any) | Destination of Transfer of Data (if any) | Subject to Automated Decision Making | 3rd Party Data Processor Used   | Joint Data Controller (if any) | Technical & Organisational Measures taken to Protect Personal Data   | Envisaged Time Limits for Erasure of Personal Information (See CEC Records Retention Schedule for further details) |
| 19.02.04  | Register of individual visitors to the Archives centre.   | Visitors book, visitors registration forms and user database records   | ICT System: Council Network<br>Paper based records         | Structured | Visitors                                     | Name;<br>Date and time of visit   | No   | 6(1)(e) Official Authority vested in the controller (arising from various Local Government and Heritage legislation)       | None  | None                                     | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br>Hard copy files securely stored and access restricted to relevant staff. | 5 years  |
| 19.02.05  | Maintenance of enquiry log of queries received by the Archives centre.  | Enquiry log of research enquiries received by the Archive service  | ICT System: Council Network<br>Paper based records         | Structured | Enquiries                                    | Name;<br>Contact Details;<br>Details of Enquiry   | No   | 6(1)(e) Official Authority vested in the controller (arising from various Local Government and Heritage legislation)       | None  | None                                     | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br>Hard copy files securely stored and access restricted to relevant staff. | 5 years  |
| <b>Part 3: Arts</b>   |   |  |  |            |  |   |  |  |   |  |                                      |   |                                |  |  |
| 19.03.01  | Records relating to applications and bids received for Arts funding   | All records including funding applications, correspondence, funding agreements / contracts, payment information and evaluation information | ICT System: Council Network<br>Paper based funding records | Structured | Applicants for funding; Artists / performers | Name;<br>Date of Birth;<br>Address;<br>Contact Details;<br>Funding Application / performance details; | No   | 6(1)(e) Official Authority vested in the controller (arising from various arts and culture legislation)                    | None  | None                                     | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br>Hard copy files securely stored and access restricted to relevant staff. | 5 years  |
| <b>Part 4: Community facilities</b>   |   |  |  |            |  |   |  |  |   |  |                                      |   |                                |  |  |
| 19.04.01  | Records relating to activities delivered by the Council through Community Centres and other Community Facilities. | All records relating to activities provided by the Council via Community facilities including attendance records.                          | ICT System: Council Network<br>Paper based records         | Structured | Participants in activities                   | Name;<br>Date of Birth;<br>Address;<br>Contact Details;<br>Activity Records                           | No   | 6(1)(e) Official Authority vested in the controller (arising from various Community Development and Education legislation) | None  | None                                     | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br>Hard copy files securely stored and access restricted to relevant staff. | 6 years  |
| 19.04.02  | Records relating to the hire of community centre facilities and other community facilities.                       | All records related to the hire of community facilities managed by the Council.  | ICT System: Council Network<br>Paper based records         | Structured | Hirers of Community Facilities               | Name;<br>Address;<br>Contact Details;<br>Hire Records including hire agreement and payment details    | No   | 6(1)(e) Official Authority vested in the controller (arising from various Community Development and Education legislation) | None  | None                                     | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br>Hard copy files securely stored and access restricted to relevant staff. | 6 years  |
| <b>Part 5: Leisure promotion</b>  |   |  |  |            |  |   |  |  |   |  |                                      |   |                                |  |  |
| No processing of personal data takes place under this category of activity. |   |  |  |            |  |   |  |  |   |  |                                      |   |                                |  |  |
| <b>Part 6: Libraries</b>  |   |  |  |            |  |   |  |  |   |  |                                      |   |                                |  |  |

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|--|--|--|--|-----------------------------|--|--|------------------------------------|--|--|--------------------------------------|-------------------------------|---|--|---|--|
|  |  |  |  |                             |  |  |                                    | Categories of Recipients of Disclosure (if any)  | Destination of Transfer of Data (if any) | Subject to Automated Decision Making | 3rd Party Data Processor Used | Joint Data Controller (if any)  | Technical & Organisational Measures taken to Protect Personal Data | Envisaged Time Limits for Erasure of Personal Information (See CEC Records Retention Schedule for further details)  |  |
| 19.06.01   | Administering library membership   | All processing including library membership registration, loans and renewals and implementation of fines or other sanctions as detailed in the Library Management Rules. | ICT System: Your Library<br>Paper based membership records | Structured                  | Library Members  | Name;<br>Address;<br>Contact Information;<br>Date of Birth (Child Members);<br>Parent / Guardian Names (Child Members) | No                                 | 6(1)(e) Official Authority vested in the controller (arising from various Library and Leisure Facilities legislation)      | None                                     | None                                 | No                            | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None   | ICT System Access Controls and ICT Security Protocols applied.<br>Hard copy files securely stored and access restricted to relevant staff.  | 1 year                                   |
| 19.06.02   | Facilitation of access to online information from external agencies via library hosted websites on library devices | All processing including user registration   | ICT System: Your Library<br>Paper based membership records | Structured                  | Library Members  | Name;<br>User Name;<br>Log in information  | No                                 | 6(1)(e) Official Authority vested in the controller (arising from various Library and Leisure Facilities legislation)      | None                                     | None                                 | No                            | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None   | ICT System Access Controls and ICT Security Protocols applied.<br>Hard copy files securely stored and access restricted to relevant staff.  | 1 year                                   |
| <b>Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks</b> |  |  |  |                             |  |  |                                    |  |  |                                      |                               |   |  |   |  |
| 19.07.01   | Cataloguing museum & galleries holdings  | Records of museums and galleries holdings and the actual holdings where they contain personal data   | ICT System: Council Network<br>Paper based records         | Structured                  | Owners and donors of museum & galleries holdings;<br>Subjects of archival holdings | Details of museum & galleries Holding;<br>Donors name and contact details (if appropriate)                             | No                                 | 6(1)(e) Official Authority vested in the controller (arising from various Local Government and arts & leisure legislation) | None                                     | None                                 | No                            | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None   | ICT System Access Controls and ICT Security Protocols applied.<br>Hard copy files securely stored and access restricted to relevant staff.<br>Archival holding held in secure storage within archive store or on suitable display with applicable security measures taken | 5 years following end of life of deposit |
| 19.07.02   | Records of Loans from the museum & galleries collection to third parties   | All records relating to loans of archival holdings made by the museums & galleries collection  | ICT System: Council Network<br>Paper based records         | Structured                  | Loan Recipients  | Name;<br>Address;<br>Contact Details;<br>Loan Agreement  | No                                 | 6(1)(e) Official Authority vested in the controller (arising from various Local Government and arts & leisure legislation) | None                                     | None                                 | No                            | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None   | ICT System Access Controls and ICT Security Protocols applied.<br>Hard copy files securely stored and access restricted to relevant staff.  | Permanent                                |

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|-------------------------------------|---|---|--|------------|--|---|--|---|---|--|--------------------------------------|---|--------------------------------|--|--|
|                                     |   |   |  |            |  |   |  |   | Categories of Recipients of Disclosure (if any) | Destination of Transfer of Data (if any) | Subject to Automated Decision Making | 3rd Party Data Processor Used   | Joint Data Controller (if any) | Technical & Organisational Measures taken to Protect Personal Data   | Envisaged Time Limits for Erasure of Personal Information (See CEC Records Retention Schedule for further details) |
| 19.07.03                            | Records of Loans to the museum & galleries collection from third parties  | All records relating to loans of archival holdings made to the museum & galleries collection  | ICT System: Council Network<br>Paper based records | Structured | Individuals who make a loan to the Council   | Name;<br>Address;<br>Contact Details;<br>Loan Agreement   | No   | 6(1)(e) Official Authority vested in the controller (arising from various Local Government and arts & leisure legislation)      | None  | None                                     | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 5 years  |
| 19.07.04                            | Maintenance of marketing list of individuals who have consented to receiving marketing information from the museums & galleries service | Use of marketing lists to promote upcoming events within the museums & galleries service  | ICT System: Council Network                        | Structured | Individuals who wish to receive museums & galleries marketing information          | Name;<br>Address;<br>Contact Details;<br>Marketing Preferences  | No   | 6(1)(a) Consent<br><br>Consent has been assessed to be appropriate for this activity using the CEC Consent Worthiness Proforma. | None  | None                                     | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.   | 1 year   |
| 19.07.05                            | Records of bookings and sales made in the museums & galleries service   | Processing of bookings and sales in the museums and galleries service.  | ICT System: Council Network<br>Paper based records | Structured | Individuals who make a booking or purchase through the museums & galleries service | Name (if booking made)<br>Address (if booking made);<br>Contact Details (if booking made);<br>Payment information | No   | 6(1)(b) Performance of a contract to which the data subject is party  | None  | None                                     | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 1 year   |
| 19.07.06                            | Records of key contacts for the hosting of events in public buildings and spaced  | Record of key contact information to support the safe and efficient utilisation of public buildings and spaces                        | ICT System: Council Network<br>Paper based records | Structured | Individuals who are key contacts for events  | Name (if booking made)<br>Address (if booking made);<br>Contact Details (if booking made);<br>Payment information | No   | 6(1)(b) Performance of a contract to which the data subject is party  | None  | None                                     | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 1 year   |
| <b>Part 8: Cinemas and theatres</b> |   |   |  |            |  |   |  |   |   |  |                                      |   |                                |  |  |
| 19.08.01                            | Contract management with artists and performance companies.   | All processing relating to the running of events within cinemas and theatres including management of artists and contract management. | ICT System: Council Network<br>Paper based records | Structured | Artists;<br>Production Companies   | Name;<br>Address;<br>Contact Details;<br>Contract Arrangements  | No   | 6(1)(b) Performance of a contract to which the data subject is party  | None  | None                                     | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 6 years  |

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|---|---|--|--|------------|--|---|--|---|---|--|--------------------------------------|---|--------------------------------|--|--|
|   |   |  |  |            |  |   |  |   | Categories of Recipients of Disclosure (if any) | Destination of Transfer of Data (if any) | Subject to Automated Decision Making | 3rd Party Data Processor Used   | Joint Data Controller (if any) | Technical & Organisational Measures taken to Protect Personal Data   | Envisaged Time Limits for Erasure of Personal Information (See CEC Records Retention Schedule for further details) |
| 19.08.02                                      | Maintenance of marketing list of individuals who have consented to receiving marketing information from the museums & galleries service | Use of marketing lists to promote upcoming events within theatres & cinemas  | ICT System: Mailchimp  | Structured | Individuals who wish to receive theatres and cinemas marketing information | Name; Address; Contact Details; Marketing Preferences   | No   | 6(1)(a) Consent<br>Consent has been assessed to be appropriate for this activity using the CEC Consent Worthiness Proforma. | None  | None                                     | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.   | 1 year   |
| 19.08.03                                      | Records of bookings and sales made in theatres & cinemas  | Processing of bookings and sales in theatres and cinemas.  | ICT System: Artefact and SR04<br>Paper based transaction records | Structured | Individuals who make a booking or purchase through theatres & cinemas      | Name (if booking made)<br>Address (if booking made);<br>Contact Details (if booking made);<br>Payment information | No   | 6(1)(b) Performance of a contract to which the data subject is party  | None  | None                                     | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br>Hard copy files securely stored and access restricted to relevant staff. | 1 year   |
| <b>Part 9: Parks and open spaces</b>          |   |  |  |            |  |   |  |   |   |  |                                      |   |                                |  |  |
| 19.09.01                                      | Records of activities, events and promotions which take place within public spaces, parks and green spaces across Edinburgh.            | All records related to activities, events and promotions held within parks and greenspace which are organised or facilitated by the Council. | ICT System: Council Network<br>Paper based records               | Structured | Individuals participating in activities, events and promotions             | Name; Address; Contact Details  | No   | 6(1)(e) Official Authority vested in the controller (arising from various Parks & Gardens legislation)                      | None  | None                                     | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br>Hard copy files securely stored and access restricted to relevant staff. | 1 year   |
| <b>Part 10: Sports</b>                        |   |  |  |            |  |   |  |   |   |  |                                      |   |                                |  |  |
| 19.10.01                                      | Records relating to applications for sports funding   | All records including funding applications, correspondence, funding agreements / contracts, payment information and evaluation information   | ICT System: Council Network<br>Paper based funding records       | Structured | Applicants for funding;  | Name; Date of Birth; Address; Contact Details; Funding Application / sports performance details;                  | No   | 6(1)(e) Official Authority vested in the controller (arising from various sports and sports development legislation)        | None  | None                                     | No                                   | Yes - Providers of ICT Services under CEC contract frameworks   | None                           | ICT System Access Controls and ICT Security Protocols applied.<br>Hard copy files securely stored and access restricted to relevant staff. | 5 years  |
| 19.10.02                                      | Administration of a Sports Coach training programme   | All processing necessary to plan and deliver the sports coaches training programme provided by the Council.                                  | ICT System: Council Network<br>Paper based training records      | Structured | Details of individuals attending sport coaches training events             | Name; Job Title; Address; Contact Details; Training requirements  | No   | 6(1)(e) Official Authority vested in the controller (arising from various sports and sports development legislation)        | None  | None                                     | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br>Hard copy files securely stored and access restricted to relevant staff. | 5 years  |
| <b>Part 11: Sports and leisure facilities</b> |   |  |  |            |  |   |  |   |   |  |                                      |   |                                |  |  |



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|---|--|---|---|------------|--|---|--|--|---|--|--------------------------------------|---|--------------------------------|--|--|
|   |  |   |   |            |  |   |  |  | Categories of Recipients of Disclosure (if any) | Destination of Transfer of Data (if any) | Subject to Automated Decision Making | 3rd Party Data Processor Used   | Joint Data Controller (if any) | Technical & Organisational Measures taken to Protect Personal Data   | Envisaged Time Limits for Erasure of Personal Information (See CEC Records Retention Schedule for further details) |
| 19.11.01                                | Records of bookings and sales made in sports and leisure facilities  | Processing of bookings and sales in sports and leisure facilities.  | ICT System: Oracle<br>Paper based booking records             | Structured | Individuals who make a booking or purchase through sports and leisure facilities | Name (if booking made)<br>Address (if booking made);<br>Contact Details (if booking made);<br>Payment information       | No   | 6(1)(b) Performance of a contract to which the data subject is party   | None  | None                                     | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 1 year   |
| 19.11.02                                | Administering sports & leisure memberships   | All processing including membership registration and activities participated in.                                      | ICT System: Council Network<br>Paper based membership records | Structured | Members  | Name;<br>Address;<br>Contact Information;<br>Date of Birth (Child Members);<br>Parent / Guardian Names (Child Members)  | No   | 6(1)(b) Performance of a contract to which the data subject is party   | None  | None                                     | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 1 year   |
| <b>Section 20: Management</b>           |  |   |   |            |  |   |  |  |   |  |                                      |   |                                |  |  |
| <b>Part 1: Ceremonial and events</b>    |  |   |   |            |  |   |  |  |   |  |                                      |   |                                |  |  |
| 20.01.01                                | Making a record of civic events hosted by the Council and official visits made to the Council                            | Keeping of records of events including video and audio recordings, visitors book, photographs, programme and speeches | ICT System: Council Network and Hard Copy Records             | Structured | Elected Members; Council Officers; Visitors / Guests                             | Name;<br>Job Title / Position;<br>Video and audio recordings;   | No   | 6(1)(e) Official Authority vested in the controller (arising from various Local Government legislation)                                    | None  | None                                     | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | Permanent  |
| 20.01.02                                | Documenting official Council representation at events and ceremonies other than those organised or hosted by the Council | Keeping of records of events including video and audio recordings, visitors book, photographs, programme and speeches | ICT System: Council Network and Hard Copy Records             | Structured | Elected Members; Council Officers; Visitors / Guests                             | Name;<br>Job Title / Position;<br>Video and audio recordings;   | No   | 6(1)(e) Official Authority vested in the controller (arising from various Local Government legislation)                                    | None  | None                                     | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 3 years  |
| <b>Part 2: Communication support</b>    |  |   |   |            |  |   |  |  |   |  |                                      |   |                                |  |  |
| 20.02.01                                | Records of provision of language translation services  | Records of translation service requests received and services provided.   | ICT System: ITS database<br>Paper based service records       | Structured | Clients  | Name;<br>Date of Birth;<br>Address;<br>Contact Details;<br>Ethnic Origin / language spoken;<br>Translation requirements | Yes  | 6(1)(e) Official Authority vested in the controller (arising from relevant Equalities legislation)<br><br>9(2)(h) Provision of social care | None  | None                                     | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 3 years  |
| <b>Part 3: Corporate communications</b> |  |   |   |            |  |   |  |  |   |  |                                      |   |                                |  |  |

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**Named Data Protection Officer:** Kevin Wilbraham, Information Governance Manager  
**Contact Details:** E-mail: information.compliance@edinburgh.gov.uk Telephone: 0131 469 6200

**Date Updated:** 09/02/2021  
**Scheduled Date of Next Review:** 01/03/2022  
**Version Number:** 2

| Ref      | Purpose of Processing  | Description of Processing   | Format of Data  |            | Categories of Data Subjects                                      | Categories of Personal Data                           | Does Processing include Special Categories of Personal Data? | Lawfulness of Processing Condition  | Disclosure and Transfer                         |  | Processing Activities  |   |                                | Security and Disposal  |  |
|----------|--|---|---|------------|--|---|--|---|---|--|--|---|--------------------------------|--|--|
|          |  |   |   |            |  |   |  |   | Categories of Recipients of Disclosure (if any) | Destination of Transfer of Data (if any) | Subject to Automated Decision Making   | 3rd Party Data Processor Used   | Joint Data Controller (if any) | Technical & Organisational Measures taken to Protect Personal Data   | Envisaged Time Limits for Erasure of Personal Information (See CEC Records Retention Schedule for further details) |
| 20.03.01 | Responses received to public consultations conducted by CEC                                      | Records documenting the responses received from members of the public and other organisations to consultations conducted by CEC                 | ICT System: Council Network<br>Paper based response records | Structured | Members of the Public; Representatives of External Organisations | Name; Address; Contact Details; Consultation Response | No   | 6(1)(e) Official Authority vested in the controller (arising from various Local Government legislation)   | None  | None                                     | No   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br>Data pseudonymised prior to publication.<br>Hard copy files securely stored and access restricted to relevant staff. | 3 years  |
| 20.03.02 | Responses received to public satisfaction surveys conducted by CEC                               | Records documenting the responses received from members of the public and other organisations to customer satisfaction surveys conducted by CEC | ICT System: Council Network<br>Paper based response records | Structured | Members of the Public; Representatives of External Organisations | Name; Address; Contact Details; Survey Response       | No   | 6(1)(e) Official Authority vested in the controller (arising from various Local Government legislation)   | None  | None                                     | No   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br>Data pseudonymised prior to publication.<br>Hard copy files securely stored and access restricted to relevant staff. | 3 years  |
| 20.03.03 | Maintenance of contact mailing lists for Council Communications                                  | Council communications, such as the Council Leaders report, are distributed via e-mail to people who have registered to receive such updates.   | ICT System: Council Network                                 | Structured | Members of the Public; Representatives of External Organisations | Name; Email Address; Job Title (if applicable)        | No   | 6(1)(e) Official Authority vested in the controller (arising from various Local Government legislation)   | None  | None                                     | Not subject to automated decision making.<br>The council uses automation software for aspects of this processing | Yes - Providers of ICT Services under CEC contract frameworks   | None                           | ICT System Access Controls and ICT Security Protocols applied.   | 1 year   |
| 20.03.04 | Taking of photographs, videos and audio recordings during public events education activities     | Recording and photography of service users, citizens and visitors during public events  | ICT System: Council Network                                 | Structured | Service Users; Employees; Citizens; Visitors                     | Images of individuals                                 | Yes  | 6(1)(e) Official Authority vested in the controller (arising from various Local Government legislation)<br><br>9(2)(a) Explicit consent of the data subject | Images of individuals                           | None                                     | No   | Yes - Providers of ICT Services under CEC contract frameworks   | None                           | ICT System Access Controls and ICT Security Protocols applied.   | 2 years  |
| 20.03.05 | Use of Royal Mail Print & Post and Dot.Post for sending external correspondence from the Council | Use of external providers to manage sending of external correspondence  | ICT System: Council Network                                 | Structured | Members of the Public; Representatives of External Organisations | Name; Postal Address                                  | No   | 6(1)(e) Official Authority vested in the controller (arising from various Local Government legislation)   | None  | None                                     | No   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.   | 1 year   |

**Part 4: Enquiries and complaints**

Record of Processing Activities as required by Article 30 of the General Data Protection Regulation and Section 61 of the Data Protection Bill

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|----------|---|---|---|-----------------------------|-----------------------------|--|---|--|---|--------------------------------------|---|--------------------------------|--|--|
|          |   |   |   |                             |                             |  |   | Categories of Recipients of Disclosure (if any)  | Destination of Transfer of Data (if any)    | Subject to Automated Decision Making | 3rd Party Data Processor Used   | Joint Data Controller (if any) | Technical & Organisational Measures taken to Protect Personal Data   | Envisaged Time Limits for Erasure of Personal Information (See CEC Records Retention Schedule for further details) |
| 20.04.01 | Records of general enquires and complaints handled by CEC   | Maintenance of case files documenting the processing of customer enquiries and complaints, including investigations undertaken and responses issued           | ICT System: Various complaints handling systems eg Capture<br>Paper based investigation files | Structured                  | Complainants                | No   | 6(1)(e) Official Authority vested in the controller (arising from various Local Government legislation) | None   | None  | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | Noe                            | ICT System Access Controls and ICT Security Protocols applied.<br>Hard copy files securely stored and access restricted to relevant staff. | 1 year   |
| 20.04.02 | Records of Stage 1 and 2 complaints handled by CEC relating to adults   | Maintenance of case files documenting the processing of customer enquiries and complaints, including investigations undertaken and responses issued           | ICT System: Various complaints handling systems eg Capture<br>Paper based investigation files | Structured                  | Complainants                | No   | 6(1)(e) Official Authority vested in the controller (arising from various Local Government legislation) | None   | None  | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | Noe                            | ICT System Access Controls and ICT Security Protocols applied.<br>Hard copy files securely stored and access restricted to relevant staff. | 3 years  |
| 20.04.03 | Records of Stage 1 and 2 complaints handled by CEC relating to children   | Maintenance of case files documenting the processing of customer enquiries and complaints, including investigations undertaken and responses issued           | ICT System: Various complaints handling systems eg Capture<br>Paper based investigation files | Structured                  | Complainants                | No   | 6(1)(e) Official Authority vested in the controller (arising from various Local Government legislation) | None   | None  | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | Noe                            | ICT System Access Controls and ICT Security Protocols applied.<br>Hard copy files securely stored and access restricted to relevant staff. | 3 years / 20 years   |
| 20.04.04 | Consideration of complaints handling by City of Edinburgh Council by the Scottish Public Services Ombudsman (SPSO)          | Submission of documentation about complaints handling to the SPSO on request and engagement with SPSO investigations  | ICT System: Various complaints handling systems eg Capture<br>Paper based investigation files | Structured                  | Complainants                | No   | 6(1)(e) Official Authority vested in the controller (arising from various Local Government legislation) | Name; Date of Birth; Address; Contact Details; Details of complaint  | Scottish Public Services Ombudsman (SPSO)   | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | Noe                            | ICT System Access Controls and ICT Security Protocols applied.<br>Hard copy files securely stored and access restricted to relevant staff. | 20 year  |
| 20.04.05 | Handing of whistle blowing allegations made to the City of Edinburgh Council, either directly or via an independent hotline | Logging, investigating and consideration of allegations made under whistleblowing legislation or engagement with external investigation into such allegations | ICT System: Various complaints handling systems eg Capture<br>Paper based investigation files | Structured                  | Whistle-blowers             | No   | 6(1)(e) Official Authority vested in the controller (arising from various Local Government legislation) | Name; Date of Birth; Address; Contact Details; Details of whistleblowing allegation; Investigation of whistleblowing allegations | Independent Whistleblowing Hotline provider | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | Noe                            | ICT System Access Controls and ICT Security Protocols applied.<br>Hard copy files securely stored and access restricted to relevant staff. | 20 year  |

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|---|--|---|---|------------|--|--|--|--|--|--|--------------------------------------|---|--------------------------------|--|--|
|   |  |   |   |            |  |  |  |  | Categories of Recipients of Disclosure (if any)  | Destination of Transfer of Data (if any) | Subject to Automated Decision Making | 3rd Party Data Processor Used   | Joint Data Controller (if any) | Technical & Organisational Measures taken to Protect Personal Data   | Envisaged Time Limits for Erasure of Personal Information (See CEC Records Retention Schedule for further details) |
| 20.04.06  | External enquiries and investigations commissioned by the Council                                | Sharing of relevant information with external investigators commissioned by the Council   | ICT System: Various complaints handling systems eg Capture<br>Paper based investigation files | Structured | Complainants; Employees; Elected Members | Name; Date of Birth; Address; Contact Details; Details of Complaint; Complaint Investigation; Complaint Conclusion | No   | 6(1)(e) Official Authority vested in the controller (arising from various Local Government legislation)                        | Name; Date of Birth; Address; Contact Details; Details of Complaint; Complaint Investigation; Complaint Conclusion | External Investigator                    | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | Noe                            | ICT System Access Controls and ICT Security Protocols applied.<br>Hard copy files securely stored and access restricted to relevant staff. | 3 years  |
| <b>Part 5: External audits</b>  |  |   |   |            |  |  |  |  |  |  |                                      |   |                                |  |  |
| No processing of personal data takes place under this category of activity. |  |   |   |            |  |  |  |  |  |  |                                      |   |                                |  |  |
| <b>Part 6: Business preparation</b>   |  |   |   |            |  |  |  |  |  |  |                                      |   |                                |  |  |
| No processing of personal data takes place under this category of activity. |  |   |   |            |  |  |  |  |  |  |                                      |   |                                |  |  |
| <b>Part 7: Project management</b>   |  |   |   |            |  |  |  |  |  |  |                                      |   |                                |  |  |
| 20.07.01  | Edinburgh & South East Scotland City Region Deal   | Maintenance of records about officers within the Council and Partner Agencies who are involved in supporting the City Region Deal programme | ICT System: Council Network   | Structured | Employees; Partner Agencies Officers     | Name; Job Title; Contact Details;  | No   | 6(1)(e) Official Authority vested in the controller (arising from various Local Government and City Deal legislation)          | Name; Job Title; Contact Details;  | City Region Deal Partners                | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br>Hard copy files securely stored and access restricted to relevant staff. | 5 years  |
| <b>Part 8: Quality and performance</b>                                      |  |   |   |            |  |  |  |  |  |  |                                      |   |                                |  |  |
| 20.08.01  | Undertaking of internal audits, quality assurance and other monitoring and compliance activities | All internal audit activities undertaken to ensure controls in place within the Council are sufficient and are being adhered to.            | ICT System: Council Network<br>Paper based audit papers                                       | Structured | All data subjects                        | All data categories  | No   | 6(1)(e) Official Authority vested in the controller (arising from various Local Government and Finance legislation)            | None   | None                                     | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br>Hard copy files securely stored and access restricted to relevant staff. | 5 years  |
| <b>Part 9: Statutory returns</b>  |  |   |   |            |  |  |  |  |  |  |                                      |   |                                |  |  |
| No processing of personal data takes place under this category of activity. |  |   |   |            |  |  |  |  |  |  |                                      |   |                                |  |  |
| <b>Part 10: Strategic planning</b>  |  |   |   |            |  |  |  |  |  |  |                                      |   |                                |  |  |
| No processing of personal data takes place under this category of activity. |  |   |   |            |  |  |  |  |  |  |                                      |   |                                |  |  |
| <b>Part 11: Resilience</b>  |  |   |   |            |  |  |  |  |  |  |                                      |   |                                |  |  |
| 20.11.01  | Resilience Training Records  | Maintenance of records to evidence training completed by officers within the Council who have allocated resilience responsibilities         | ICT System: Council Network<br>Paper based training records                                   | Structured | Employees                                | Name; Job Title; Contact Details; Record of training attended  | No   | 6(1)(e) Official Authority vested in the controller (arising from various Local Government and Emergency Planning legislation) | None   | None                                     | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br>Hard copy files securely stored and access restricted to relevant staff. | 5 years  |

Record of Processing Activities as required by Article 30 of the General Data Protection Regulation and Section 61 of the Data Protection Bill

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|---|--|---|---|------------|---|--|--|--|--|--|--------------------------------------|---|--------------------------------|--|--|
|   |  |   |   |            |   |  |  |  | Categories of Recipients of Disclosure (if any)  | Destination of Transfer of Data (if any)   | Subject to Automated Decision Making | 3rd Party Data Processor Used   | Joint Data Controller (if any) | Technical & Organisational Measures taken to Protect Personal Data   | Envisaged Time Limits for Erasure of Personal Information (See CEC Records Retention Schedule for further details) |
| 20.11.02  | Serious Incident Emergency Response                      | Maintenance of records of Senior Officers who participate in the Council's Serious Incident Emergency Response rota   | ICT System: Council Network<br>Paper based training records | Structured | Employees   | Name;<br>Job Title;<br>Contact Details (including Out of Hours contact details)  | No   | 6(1)(e) Official Authority vested in the controller (arising from various Local Government and Emergency Planning legislation) | None   | None   | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 5 years  |
| <b>Part 12: Emergency services</b>  |  |   |   |            |   |  |  |  |  |  |                                      |   |                                |  |  |
| No processing of personal data takes place under this category of activity. |  |   |   |            |   |  |  |  |  |  |                                      |   |                                |  |  |
| <b>Section 21: Planning and Building Standards</b>                          |  |   |   |            |   |  |  |  |  |  |                                      |   |                                |  |  |
| <b>Part 1: Building standards</b>   |  |   |   |            |   |  |  |  |  |  |                                      |   |                                |  |  |
| 21.01.01  | Processing of applications for Building Warrants         | All records relating to building warrant applications including records of pre application discussion, application paperwork, consultation responses and application outcome.             | ICT System: Uniform<br>Paper based application records      | Structured | Applicants; Agents; Consultees                            | Name;<br>Address;<br>Contact Details;<br>Building Warrant Application details;<br>Agents Name and Contact Details;<br>Consultees name, contact details and consultation responses    | No   | 6(1)(e) Official Authority vested in the controller (arising from various Planning Control and Building Standards legislation) | Name;<br>Address;<br>Contact Details;<br>Building Warrant Application details;<br>Agents Name and Contact Details;<br>Consultees name, contact details and consultation responses    | Applications for Building Warrants are published on the CEC Planning Portal to allow public inspection and consultation.       | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | Between 25 years and permanently, depending on the type of application.  |
| 21.01.02  | Compliance and enforcement of building standards matters | All records relating to compliance and enforcement actions taken in circumstances where there has been unauthorised works or where buildings are assessed as been dangerous or defective. | ICT System: Uniform<br>Paper based application records      | Structured | Individuals subject to compliance and enforcement actions | Name;<br>Address;<br>Contact Details;<br>Details of compliance and enforcement action taken  | No   | 6(1)(e) Official Authority vested in the controller (arising from various Planning Control and Building Standards legislation) | Name;<br>Address;<br>Contact Details;<br>Details of compliance and enforcement action taken  | Compliance and Enforcement actions taken are published on the CEC Planning Portal to allow public inspection and consultation. | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | Permanent  |
| <b>Part 2: Development management</b>                                       |  |   |   |            |   |  |  |  |  |  |                                      |   |                                |  |  |
| 21.02.01  | Processing of applications for Building Warrants         | All records relating to building warrant applications including records of pre application discussion, application paperwork, consultation responses and application outcome.             | ICT System: Uniform<br>Paper based application records      | Structured | Applicants; Agents; Consultees                            | Name;<br>Address;<br>Contact Details;<br>Planning Permission Application details;<br>Agents Name and Contact Details;<br>Consultees name, contact details and consultation responses | No   | 6(1)(e) Official Authority vested in the controller (arising from various Planning legislation)                                | Name;<br>Address;<br>Contact Details;<br>Planning Permission Application details;<br>Agents Name and Contact Details;<br>Consultees name, contact details and consultation responses | Applications for Planning Permission are published on the CEC Planning Portal to allow public inspection and consultation.     | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | Between 25 years and permanently, depending on the type of application.  |

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|---------------------------------|--|---|--|------------|---|--|--|--|--|--|--------------------------------------|---|--------------------------------|--|--|
|                                 |  |   |  |            |   |  |  |  | Categories of Recipients of Disclosure (if any)  | Destination of Transfer of Data (if any)   | Subject to Automated Decision Making | 3rd Party Data Processor Used   | Joint Data Controller (if any) | Technical & Organisational Measures taken to Protect Personal Data   | Envisaged Time Limits for Erasure of Personal Information (See CEC Records Retention Schedule for further details) |
| 21.02.02                        | Compliance and enforcement of planning matters | All records relating to compliance and enforcement actions taken in circumstances where there has been unauthorised works or where buildings are assessed as been dangerous or defective.                         | ICT System: Uniform<br>Paper based application records | Structured | Individuals subject to compliance and enforcement actions   | Name; Address; Contact Details; Details of compliance and enforcement action taken               | No   | 6(1)(e) Official Authority vested in the controller (arising from various Planning legislation)                                | Name; Address; Contact Details; Details of compliance and enforcement action taken               | Compliance and Enforcement actions taken are published on the CEC Planning Portal to allow public inspection and consultation. | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br>Hard copy files securely stored and access restricted to relevant staff. | Permanent  |
| 21.02.03                        | Making of Tree Preservation Orders             | All records relating to the making of Tree Preservation Orders where they involve the processing of personal data (for example of the owner of the property in which a tree made subject to a TPO is situated)    | ICT System: Uniform<br>Paper based application records | Structured | Individuals involved in a Tree Preservation Order being made  | Name; Address; Contact Details; Details of Tree Preservation Order                               | No   | 6(1)(e) Official Authority vested in the controller (arising from various Planning legislation)                                | None   | None   | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br>Hard copy files securely stored and access restricted to relevant staff. | Permanent  |
| 21.02.04                        | Making of High Hedge Order                     | All records relating to the making of a High Hedge Orders where they involve the processing of personal data (for example of the owner of the property in which a hedge made subject to a High Hedge is situated) | ICT System: Uniform<br>Paper based application records | Structured | Individuals involved in a High Hedge Order being made   | Name; Address; Contact Details; Details of High Hedge Order                                      | No   | 6(1)(e) Official Authority vested in the controller (arising from various Planning legislation)                                | None   | None   | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br>Hard copy files securely stored and access restricted to relevant staff. | Permanent  |
| <b>Part 3: Forward planning</b> |  |   |  |            |   |  |  |  |  |  |                                      |   |                                |  |  |
| 21.03.01                        | Local Development Plan preparation             | All records relating to consultation undertaken in the preparation of the Local Development Plan  | ICT System: Uniform<br>Paper based application records | Structured | Applicants; Agents; Consultees  | Consultees name, contact details and consultation responses                                      | No   | 6(1)(e) Official Authority vested in the controller (arising from various Planning Control and Building Standards legislation) | Consultees name, contact details and consultation responses                                      | Local Development Plan consultation responses are published online as part of the preparation process                          | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br>Hard copy files securely stored and access restricted to relevant staff. | 5 years  |
| <b>Section 22: Procurement</b>  |  |   |  |            |   |  |  |  |  |  |                                      |   |                                |  |  |
| <b>Part 1: Contracting</b>      |  |   |  |            |   |  |  |  |  |  |                                      |   |                                |  |  |
| 22.01.01                        | Contract, Grant and supplier management        | Keeping all records associated with contract and supplier management such as contract handover documents, record of contract variations and contract monitoring and performance records                           | ICT System: Oracle<br>Paper based contract records     | Structured | Individuals with whom the Council contracts; Representative(s) of organisations with whom the Council contracts | Name; Address; Contact Details; Job Title / Position; Details of service provided under contract | No   | 6(1)(b) Performance of a contract to which the data subject is party   | Name; Address; Contact Details; Job Title / Position; Details of service provided under contract | Police Scotland  | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br>Hard copy files securely stored and access restricted to relevant staff. | 5 years  |

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|---|---|---|--|------------|---|---|--|--|---|---|--------------------------------------|---|--------------------------------|--|--|
|   |   |   |  |            |   |   |  |  | Categories of Recipients of Disclosure (if any)   | Destination of Transfer of Data (if any)                | Subject to Automated Decision Making | 3rd Party Data Processor Used   | Joint Data Controller (if any) | Technical & Organisational Measures taken to Protect Personal Data   | Envisaged Time Limits for Erasure of Personal Information (See CEC Records Retention Schedule for further details) |
| 22.01.02  | Supplier set up and management  | Keeping all records associated with the setting up of a new supplier including HM Revenue & Customs Status check and vendor personal details                                      | ICT System: Oracle<br>Paper based supplier records                   | Structured | Individuals with whom the Council contracts; Representative(s) of organisations with whom the Council contracts         | Name; Address; Contact Details; Job Title / Position; Bank Account Details; HM Revenue & Customs status check outcome | No   | 6(1)(b) Performance of a contract to which the data subject is party   | Name; Address; Contact Details; Job Title / Position; Details of service provided under contract        | Police Scotland   | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br>Hard copy files securely stored and access restricted to relevant staff. | 6 years  |
| <b>Part 2: Market information</b>   |   |   |  |            |   |   |  |  |   |   |                                      |   |                                |  |  |
| No processing of personal data takes place under this category of activity. |   |   |  |            |   |   |  |  |   |   |                                      |   |                                |  |  |
| <b>Part 3: Tendering</b>  |   |   |  |            |   |   |  |  |   |   |                                      |   |                                |  |  |
| 22.03.01  | Managing the process for tendering Council contracts                                  | Record of invitation to tender, tenders received, tender evaluations, clarifications and responses and post tender negotiation  | ICT System: Oracle<br>Paper based tendering records                  | Structured | Individuals whom submit a tender to the Council; Representative(s) of organisations whom submit a tender to the Council | Name; Address; Contact Details; Job Title / Position; Details of tender   | No   | 6(1)(b) To take steps at the request of the data subject prior to entering into a contract   | None  | None  | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br>Hard copy files securely stored and access restricted to relevant staff. | 5 years  |
| <b>Section 23: Registrars</b>   |   |   |  |            |   |   |  |  |   |   |                                      |   |                                |  |  |
| <b>Part 1: Marriage services</b>  |   |   |  |            |   |   |  |  |   |   |                                      |   |                                |  |  |
| 23.01.01  | Maintenance of schedule of marriages and civil partnerships                           | CEC are data processors on behalf of National Records of Scotland and are responsible for maintaining schedules of marriages and civil partnerships in Edinburgh.                 | National Records of Scotland ICT System and associated paper records | Structured | Individuals who intend to enter into a marriage or civil partnership  | Name; Date of Birth; Marital Status; Parents Names; Address; Contact Details; Marriage ceremony details               | Yes  | 6(1)(c) Legal Obligation<br>Registration of Births, Death and Marriages (Scotland) Act 1965<br>9(2)(b) Social Protection Legal Obligations | Name; Date of Birth; Marital Status; Parents Names; Address; Contact Details; Marriage ceremony details | Information transferred to National Records of Scotland | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br>Hard copy files securely stored and access restricted to relevant staff. | After inspection by National Records of Scotland   |
| 23.01.02  | Maintenance of Register of Corrections in respect of marriages and civil partnerships | CEC are data processors on behalf of National Records of Scotland and are responsible for maintaining a register of corrections of marriages and civil partnerships in Edinburgh. | National Records of Scotland ICT System and associated paper records | Structured | Individuals who intend to enter into a marriage or civil partnership  | Name; Date of Birth; Marital Status; Parents Names; Address; Contact Details; Marriage ceremony details               | Yes  | 6(1)(c) Legal Obligation<br>Registration of Births, Death and Marriages (Scotland) Act 1965<br>9(2)(b) Social Protection Legal Obligations | Name; Date of Birth; Marital Status; Parents Names; Address; Contact Details; Marriage ceremony details | Information transferred to National Records of Scotland | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br>Hard copy files securely stored and access restricted to relevant staff. | After inspection by National Records of Scotland   |
| 23.01.03  | Register of Marriages and Civil Partnerships  | CEC are data processors on behalf of National Records of Scotland and are responsible for maintaining registers of marriages and civil partnerships in Edinburgh.                 | National Records of Scotland ICT System and associated paper records | Structured | Individuals who intend to enter into a marriage or civil partnership  | Name; Date of Birth; Marital Status; Parents Names; Address; Contact Details; Marriage ceremony details               | Yes  | 6(1)(c) Legal Obligation<br>Registration of Births, Death and Marriages (Scotland) Act 1965<br>9(2)(b) Social Protection Legal Obligations | Name; Date of Birth; Marital Status; Parents Names; Address; Contact Details; Marriage ceremony details | Information transferred to National Records of Scotland | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br>Hard copy files securely stored and access restricted to relevant staff. | After inspection by National Records of Scotland   |
| <b>Part 2: Registration of births, marriages and deaths</b>                 |   |   |  |            |   |   |  |  |   |   |                                      |   |                                |  |  |

Record of Processing Activities as required by Article 30 of the General Data Protection Regulation and Section 61 of the Data Protection Bill

**Data Controller** The City of Edinburgh Council, Waverley Court, 4 East Market Street, Edinburgh, EH8 8BG  
**Named Data Protection Officer:** Kevin Wilbraham, Information Governance Manager  
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**Date Updated:** 09/02/2021  
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|---|--|---|--|------------|--|--|--|---|---|--|--------------------------------------|---|--------------------------------|--|--|
|   |  |   |  |            |  |  |  |   | Categories of Recipients of Disclosure (if any)   | Destination of Transfer of Data (if any)                   | Subject to Automated Decision Making | 3rd Party Data Processor Used   | Joint Data Controller (if any) | Technical & Organisational Measures taken to Protect Personal Data   | Envisaged Time Limits for Erasure of Personal Information (See CEC Records Retention Schedule for further details) |
| 23.02.01  | Register of Births   | CEC are data processors on behalf of National Records of Scotland and are responsible for maintaining registers of births in Edinburgh.       | National Records of Scotland ICT System and associated paper records | Structured | Individuals who intend to enter into a marriage or civil partnership | Name; Date of Birth; Time of Birth; Location of Birth; Parents Names; Address; Contact Details;                                    | Yes  | 6(1)(c) Legal Obligation<br><br>Registration of Births, Death and Marriages (Scotland) Act 1965<br><br>9(2)(b) Social Protection Legal Obligations          | Name; Date of Birth; Marital Status; Parents Names; Address; Contact Details; Marriage ceremony details | Information transferred to National Records of Scotland    | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | After inspection by National Records of Scotland   |
| 23.02.02  | Register of Still Births   | CEC are data processors on behalf of National Records of Scotland and are responsible for maintaining registers of still births in Edinburgh. | National Records of Scotland ICT System and associated paper records | Structured | Individuals who intend to enter into a marriage or civil partnership | Name; Date of Still Birth; Time of Still Birth; Location of Still Birth; Parents Names; Address; Contact Details;                  | Yes  | 6(1)(c) Legal Obligation<br><br>Registration of Births, Death and Marriages (Scotland) Act 1965<br><br>9(2)(b) Social Protection Legal Obligations          | Name; Date of Birth; Marital Status; Parents Names; Address; Contact Details; Marriage ceremony details | Information transferred to National Records of Scotland    | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | After inspection by National Records of Scotland   |
| 23.02.03  | Register of Deaths   | CEC are data processors on behalf of National Records of Scotland and are responsible for maintaining registers of deaths in Edinburgh.       | National Records of Scotland ICT System and associated paper records | Structured | Individuals who intend to enter into a marriage or civil partnership | Name; Date of Death; Time of Death; Cause of Death; Location of Death; Name of person registering death; Address; Contact Details; | Yes  | 6(1)(c) Legal Obligation<br><br>Registration of Births, Death and Marriages (Scotland) Act 1965<br><br>9(2)(b) Social Protection Legal Obligations          | Name; Date of Birth; Marital Status; Parents Names; Address; Contact Details; Marriage ceremony details | Information transferred to National Records of Scotland    | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | After inspection by National Records of Scotland   |
| <b>Part 3: Treasure trove</b>                       |  |   |  |            |  |  |  |   |   |  |                                      |   |                                |  |  |
| This is not a Local Authority Function in Scotland. |  |   |  |            |  |  |  |   |   |  |                                      |   |                                |  |  |
| <b>Section 24: Risk and Insurance</b>               |  |   |  |            |  |  |  |   |   |  |                                      |   |                                |  |  |
| <b>Part 1: Claims</b>                               |  |   |  |            |  |  |  |   |   |  |                                      |   |                                |  |  |
| 24.02.01  | Claim management of insurance claims made by CEC                 | All processing necessary to progress insurance claim  | ICT System: LACHS<br>Paper based claim management files              | Structured | Claimants  | Name; Date of Birth; Address; Contact Details; Circumstances of Insurance Claim  | Yes  | 6(1)(e) Official Authority vested in the controller (arising from various Local Government and Finance legislation)<br><br>9(2)(f) Exercise of legal claims | Name; Date of Birth; Address; Contact Details; Circumstances of Insurance Claim                         | UK based Data Processor used to undertake claim management | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 6 years  |
| 24.02.02  | Claim Management of claims made against CEC in respect of adults | All processing necessary to progress insurance claim  | ICT System: LACHS<br>Paper based claim management files              | Structured | Claimants  | Name; Date of Birth; Address; Contact Details; Circumstances of Insurance Claim  | Yes  | 6(1)(e) Official Authority vested in the controller (arising from various Local Government and Finance legislation)<br><br>9(2)(f) Defence of legal claims  | Name; Date of Birth; Address; Contact Details; Circumstances of Insurance Claim                         | UK based Data Processor used to undertake claim management | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 6 years  |



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|--------------------------------------|--|--|---|------------|---|---|--|--|---|--|--------------------------------------|---|--------------------------------|--|--|
|                                      |  |  |   |            |   |   |  |  | Categories of Recipients of Disclosure (if any)   | Destination of Transfer of Data (if any)                   | Subject to Automated Decision Making | 3rd Party Data Processor Used   | Joint Data Controller (if any) | Technical & Organisational Measures taken to Protect Personal Data   | Envisaged Time Limits for Erasure of Personal Information (See CEC Records Retention Schedule for further details) |
| 24.02.03                             | Claim Management of claims made against CEC in respect of children   | All processing necessary to progress insurance claim   | ICT System: LACHS<br>Paper based claim management files | Structured | Claimants   | Name;<br>Date of Birth;<br>Address;<br>Contact Details;<br>Circumstances of Insurance Claim   | Yes  | 6(1)(e) Official Authority vested in the controller (arising from various Local Government and Finance legislation)<br><br>9(2)(f) Defence of legal claims | Name;<br>Date of Birth;<br>Address;<br>Contact Details;<br>Circumstances of Insurance Claim | UK based Data Processor used to undertake claim management | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 19 years   |
| <b>Part 2: Insuring against loss</b> |  |  |   |            |   |   |  |  |   |  |                                      |   |                                |  |  |
| 24.02.01                             | Arranging Insurance Cover as required by CEC   | All records relating to the arranging of suitable insurance including tenders, evaluations and insurance cover contracts | ICT System: LACHS<br>Paper based insurance records      | Structured | Employees;<br>Tenants;<br>Customers / clients;<br>Members of the public | Name;<br>Date of Birth;<br>Address;<br>Contact Details;<br>Insurance Needs and Cover provided | No   | 6(1)(e) Official Authority vested in the controller (arising from various Local Government and Finance legislation)  | None  | None   | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 5 years  |
| 24.02.02                             | Promotion of Contents Insurance Cover to CEC Housing Tenants   | All records relating to the arranging of suitable insurance including tenders, evaluations and insurance cover contracts | ICT System: LACHS<br>Paper based insurance records      | Structured | Tenants   | Name;<br>Date of Birth;<br>Address;<br>Contact Details;<br>Insurance Needs and Cover provided | No   | 6(1)(e) Official Authority vested in the controller (arising from various Local Government and Finance legislation)  | None  | None   | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 6 years  |
| 24.02.03                             | Provision of buildings insurance for former council housing where CEC provided mortgage facilities   | All records relating to the arranging of suitable insurance including tenders, evaluations and insurance cover contracts | ICT System: LACHS<br>Paper based insurance records      | Structured | Owner Occupiers who had exercised a Right to Buy                        | Name;<br>Date of Birth;<br>Address;<br>Contact Details;<br>Insurance Needs and Cover provided | No   | 6(1)(e) Official Authority vested in the controller (arising from various Local Government and Finance legislation)  | None  | None   | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 7 years  |
| 24.02.04                             | Provision of Insurance Services, including making insurance arrangements, managing claims and providing advice for Scottish Borders Council      | All records relating to the arranging of suitable insurance including tenders, evaluations and insurance cover contracts | ICT System: LACHS<br>Paper based insurance records      | Structured | Employees;<br>Tenants;<br>Customers / clients;<br>Members of the public | Name;<br>Date of Birth;<br>Address;<br>Contact Details;<br>Insurance Needs and Cover provided | No   | 6(1)(e) Official Authority vested in the controller (arising from various Local Government and Finance legislation)  | None  | None   | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 8 years  |
| 24.02.05                             | Provision of Insurance Services, including making insurance arrangements, managing claims and providing advice for Lothian Valuation Joint Board | All records relating to the arranging of suitable insurance including tenders, evaluations and insurance cover contracts | ICT System: LACHS<br>Paper based insurance records      | Structured | Employees;<br>Tenants;<br>Customers / clients;<br>Members of the public | Name;<br>Date of Birth;<br>Address;<br>Contact Details;<br>Insurance Needs and Cover provided | No   | 6(1)(e) Official Authority vested in the controller (arising from various Local Government and Finance legislation)  | None  | None   | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 9 years  |

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|---|--|--|--|------------|--|---|--|---|---|---|--------------------------------------|---|--------------------------------|--|--|
|   |  |  |  |            |  |   |  |   | Categories of Recipients of Disclosure (if any)   | Destination of Transfer of Data (if any)  | Subject to Automated Decision Making | 3rd Party Data Processor Used   | Joint Data Controller (if any) | Technical & Organisational Measures taken to Protect Personal Data   | Envisaged Time Limits for Erasure of Personal Information (See CEC Records Retention Schedule for further details) |
| 24.02.06  | Provision of Insurance Services, including making insurance arrangements, managing claims and providing advice for Lothian Valuation Joint Board | All records relating to the arranging of suitable insurance including tenders, evaluations and insurance cover contracts   | ICT System: LACHS<br>Paper based insurance records                                 | Structured | Employees; Tenants; Customers / clients; Members of the public | Name; Date of Birth; Address; Contact Details; Insurance Needs and Cover provided             | No   | 6(1)(e) Official Authority vested in the controller (arising from various Local Government and Finance legislation) | None  | None  | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br>Hard copy files securely stored and access restricted to relevant staff. | 10 years   |
| 24.02.07  | Provision of Insurance Services(for buildings insurance only) for Lothian Pension Fund   | All records relating to the arranging of suitable insurance including tenders, evaluations and insurance cover contracts   | ICT System: LACHS<br>Paper based insurance records                                 | Structured | Tenants  | Name; Date of Birth; Address; Contact Details; Insurance Needs and Cover provided             | No   | 6(1)(e) Official Authority vested in the controller (arising from various Local Government and Finance legislation) | None  | None  | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br>Hard copy files securely stored and access restricted to relevant staff. | 11 years   |
| <b>Part 3: Risk management</b>  |  |  |  |            |  |   |  |   |   |   |                                      |   |                                |  |  |
| No processing of personal data takes place under this category of activity. |  |  |  |            |  |   |  |   |   |   |                                      |   |                                |  |  |
| <b>Section 25: Transport and Infrastructure</b>                             |  |  |  |            |  |   |  |   |   |   |                                      |   |                                |  |  |
| <b>Part 1: Design and construction</b>                                      |  |  |  |            |  |   |  |   |   |   |                                      |   |                                |  |  |
| No processing of personal data takes place under this category of activity. |  |  |  |            |  |   |  |   |   |   |                                      |   |                                |  |  |
| <b>Part 2: Flood prevention, harbours, reservoirs and waterways</b>         |  |  |  |            |  |   |  |   |   |   |                                      |   |                                |  |  |
| No processing of personal data takes place under this category of activity. |  |  |  |            |  |   |  |   |   |   |                                      |   |                                |  |  |
| <b>Part 3: Roads development control</b>                                    |  |  |  |            |  |   |  |   |   |   |                                      |   |                                |  |  |
| 25.03.01  | Record of responses received in respect of consultations on roads planning schemes and amendments  | Representations received, considered and responded to as appropriate   | System: Comino<br>Paper based response records                                     | Structured | Consultation Respondents                                       | Name; Contact Details; Details of Representations made  | No   | 6(1)(e) Official Authority vested in the controller (arising from various Roads Development legislation)            | None  | None  | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br>Hard copy files securely stored and access restricted to relevant staff. | 5 years  |
| <b>Part 4: Highway enforcement</b>  |  |  |  |            |  |   |  |   |   |   |                                      |   |                                |  |  |
| 25.04.01  | Management of on-street and off-street parking bays for which payment is due   | All processing including online payment of parking charges, issuing and collection of Penalty Charge Notices and all processing related to the uplift of vehicles from controlled parking zones. | ICT System: Xerox Parking & Bus Lane Enforcement<br>Paper based management records | Structured | Customers  | Name; Address; Contact Details; Car Registration Number; Parking location and duration        | No   | 6(1)(e) Official Authority vested in the controller (arising from various Roads Management legislation)             | Name; Address; Contact Details; Car Registration Number; Parking location and duration        | Information shared with DVLA if registered owner requires to be identified in order to pursue debt etc. | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br>Hard copy files securely stored and access restricted to relevant staff. | 5 years  |
| 25.04.02  | Management of bus lane entry restrictions  | All processing including online payment of Penalty Charge Notices issued for bus lane violations   | ICT System: Xerox Parking & Bus Lane Enforcement<br>Paper based management records | Structured | Customers  | Name; Address; Contact Details; Car Registration Number; Bus Lane violation location and time | No   | 6(1)(e) Official Authority vested in the controller (arising from various Roads Management legislation)             | Name; Address; Contact Details; Car Registration Number; Bus Lane violation location and time | Information shared with DVLA if registered owner requires to be identified in order to pursue debt etc. | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br>Hard copy files securely stored and access restricted to relevant staff. | 5 years  |

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|---|--|---|--------------------|------------|-----------------------------|--|--|--|--|--|--------------------------------------|---|--------------------------------|--|--|
|   |  |   |                    |            |                             |  |  |  | Categories of Recipients of Disclosure (if any)                      | Destination of Transfer of Data (if any) | Subject to Automated Decision Making | 3rd Party Data Processor Used   | Joint Data Controller (if any) | Technical & Organisational Measures taken to Protect Personal Data   | Envisaged Time Limits for Erasure of Personal Information (See CEC Records Retention Schedule for further details) |
| 25.04.03  | Processing applications for on-street permits for builders skips, building materials, scaffolding etc. | All records associated with the process for handling applications for and issuing of permits allowing for the use of the public highway for a specified purpose for a specified duration. | ICT System: iWorld | Structured | Applicants                  | Name; Address; Contact Details; Application Details                  | No   | 6(1)(e) Official Authority vested in the controller (arising from various Roads Management legislation)        | None   | None                                     | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | Noe                            | ICT System Access Controls and ICT Security Protocols applied.<br>Hard copy files securely stored and access restricted to relevant staff. | 3 years  |
| 25.04.04  | Processing applications for the provision of drop kerbs.   | All records associated with the process for handling applications for and permission issued for the provision of a dropped kerb in a specified location.                                  | ICT System: iWorld | Structured | Applicants                  | Name; Address; Contact Details; Application Details                  | No   | 6(1)(e) Official Authority vested in the controller (arising from various Roads Management legislation)        | None   | None                                     | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | Noe                            | ICT System Access Controls and ICT Security Protocols applied.<br>Hard copy files securely stored and access restricted to relevant staff. | 3 years  |
| <b>Part 5: Infrastructure management</b>                                    |  |   |                    |            |                             |  |  |  |  |  |                                      |   |                                |  |  |
| 25.05.01  | Infrastructure faults  | All records associated with the process for received reports of infrastructure faults from individuals  | ICT System: iWorld | Structured | Applicants                  | Name; Address; Contact Details; Fault details                        | No   | 6(1)(e) Official Authority vested in the controller (arising from various Roads Management legislation)        | None   | None                                     | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | Noe                            | ICT System Access Controls and ICT Security Protocols applied.<br>Hard copy files securely stored and access restricted to relevant staff. | 3 years  |
| 25.05.02  | Replenishment of grit bins and other infrastructure sundries   | All records associated with the process for receiving reports of empty grit bins and other required infrastructure sundries   | ICT System: iWorld | Structured | Applicants                  | Name; Address; Contact Details; Request details                      | No   | 6(1)(e) Official Authority vested in the controller (arising from various Roads Management legislation)        | None   | None                                     | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | Noe                            | ICT System Access Controls and ICT Security Protocols applied.<br>Hard copy files securely stored and access restricted to relevant staff. | 3 years  |
| <b>Part 6: Public transport</b>   |  |   |                    |            |                             |  |  |  |  |  |                                      |   |                                |  |  |
| 25.06.01  | Processing applications for concessionary travel   | All records associated with the process for handling applications for concessionary travel.   | ICT System: iWorld | Structured | Applicants                  | Name; Address; Contact Details; Eligibility for Concessionary Travel | No   | 6(1)(e) Official Authority vested in the controller (arising from various Education and Transport legislation) | Name; Address; Contact Details; Eligibility for Concessionary Travel | Scottish Government                      | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | Noe                            | ICT System Access Controls and ICT Security Protocols applied.<br>Hard copy files securely stored and access restricted to relevant staff. | 5 years  |
| <b>Part 7: Rights of way</b>  |  |   |                    |            |                             |  |  |  |  |  |                                      |   |                                |  |  |
| No processing of personal data takes place under this category of activity. |  |   |                    |            |                             |  |  |  |  |  |                                      |   |                                |  |  |
| <b>Part 8: Road maintenance</b>   |  |   |                    |            |                             |  |  |  |  |  |                                      |   |                                |  |  |
| No processing of personal data takes place under this category of activity. |  |   |                    |            |                             |  |  |  |  |  |                                      |   |                                |  |  |
| <b>Part 9: Road safety</b>  |  |   |                    |            |                             |  |  |  |  |  |                                      |   |                                |  |  |

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|--|--|---|--|------------|--|--|--|--|--|--|--------------------------------------|---|--------------------------------|--|--|
|  |  |   |  |            |  |  |  |  | Categories of Recipients of Disclosure (if any)  | Destination of Transfer of Data (if any)               | Subject to Automated Decision Making | 3rd Party Data Processor Used   | Joint Data Controller (if any) | Technical & Organisational Measures taken to Protect Personal Data   | Envisaged Time Limits for Erasure of Personal Information (See CEC Records Retention Schedule for further details) |
| 25.09.01   | Records of investigations undertaken into reported road safety hazards or road accidents and action taken in response. | All records associated with the process for investigating road safety incidents and accidents and the actions arising from those investigations.. | ICT System: iWorld<br>Paper based investigation files          | Structured | Accident Victims or those involved in reported incidents     | Name;<br>Address;<br>Contact Details;<br>Circumstance of accident / incident;<br>Investigation Report;<br>Actions arising from investigation | No   | 6(1)(e) Official Authority vested in the controller (arising from various Roads and Road Safety legislation)   | None   | Police Scotland  | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 5 years  |
| 25.09.02   | Administration of a Road Safety training programme   | All processing necessary to plan and deliver the road safety training programme provided by the Council.  | ICT System: iWorld<br>Paper based training records             | Structured | Details of individuals attending road safety training events | Name;<br>Job Title;<br>Address;<br>Contact Details;<br>Training requirements   | No   | 6(1)(e) Official Authority vested in the controller (arising from various Roads and Road Safety legislation)   | None   | None   | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 5 years  |
| <b>Part 10: Schools transport</b>  |  |   |  |            |  |  |  |  |  |  |                                      |   |                                |  |  |
| 25.10.01   | Processing applications for the provision of school transport  | All records associated with the process for handling applications for and issuing of school transport passes.                                     | ICT System: iWorld<br>Paper based application records          | Structured | School Pupils  | Name;<br>Address;<br>Contact Details;<br>Parent / Guardian Name and Contact Details;<br>School enrolment                                     | No   | 6(1)(e) Official Authority vested in the controller (arising from various Education and Transport legislation) | None   | None   | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | Noe                            | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 5 years  |
| <b>Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks</b> |  |   |  |            |  |  |  |  |  |  |                                      |   |                                |  |  |
| 25.11.01   | Handling complaints received about traffic management matters  | Maintenance of case files documenting the processing of customer complaints, including investigations undertaken and responses issued             | ICT System: Council Network<br>Paper based investigation files | Structured | Complainants   | Name;<br>Address;<br>Contact Details;<br>Details of complaint;<br>Outcome of Investigation   | No   | 6(1)(e) Official Authority vested in the controller (arising from various Roads Management legislation)        | None   | None   | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | Noe                            | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 3 years  |
| 25.11.02   | Processing applications for a resident parking permit or a disabled parking blue badge                                 | All records associated with the process for handling applications for and issuing of resident and disabled parking permits.                       | ICT System: iWorld<br>Paper based application records          | Structured | Applicants   | Name;<br>Address;<br>Contact Details;<br>Vehicle Registration Number;<br>Vehicle Engine Emissions Health (for blue badge only)               | No   | 6(1)(e) Official Authority vested in the controller (arising from various Roads Management legislation)        | Name;<br>Address;<br>Contact Details;<br>Vehicle Registration Number;<br>Vehicle Engine Emissions Health (for blue badge only) | NHS Lothian (where relevant to blue badge application) | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | Noe                            | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 1 year   |
| <b>Part 12: Transport planning</b>   |  |   |  |            |  |  |  |  |  |  |                                      |   |                                |  |  |
| No processing of personal data takes place under this category of activity.                                      |  |   |  |            |  |  |  |  |  |  |                                      |   |                                |  |  |
| <b>Section 26: Waste Management</b>  |  |   |  |            |  |  |  |  |  |  |                                      |   |                                |  |  |
| <b>Part 1: Waste Strategy</b>  |  |   |  |            |  |  |  |  |  |  |                                      |   |                                |  |  |
| No processing of personal data takes place under this category of business.                                      |  |   |  |            |  |  |  |  |  |  |                                      |   |                                |  |  |
| <b>Part 2: Fly tipping</b>   |  |   |  |            |  |  |  |  |  |  |                                      |   |                                |  |  |

Record of Processing Activities as required by Article 30 of the General Data Protection Regulation and Section 61 of the Data Protection Bill

**Data Controller** The City of Edinburgh Council, Waverley Court, 4 East Market Street, Edinburgh, EH8 8BG  
**Named Data Protection Officer:** Kevin Wilbraham, Information Governance Manager  
**Contact Details:** E-mail: information.compliance@edinburgh.gov.uk Telephone: 0131 469 6200

**Date Updated:** 09/02/2021  
**Scheduled Date of Next Review:** 01/03/2022  
**Version Number:** 2

| Ref                             | Purpose of Processing   | Description of Processing  | Format of Data   | Categories of Data Subjects | Categories of Personal Data  | Does Processing include Special Categories of Personal Data? | Lawfulness of Processing Condition  | Disclosure and Transfer  |  | Processing Activities                |   |                                | Security and Disposal  |  |
|---------------------------------|---|--|--|-----------------------------|------------------------------|--|---|--|--|--------------------------------------|---|--------------------------------|--|--|
|                                 |   |  |  |                             |                              |  |   | Categories of Recipients of Disclosure (if any)  | Destination of Transfer of Data (if any) | Subject to Automated Decision Making | 3rd Party Data Processor Used   | Joint Data Controller (if any) | Technical & Organisational Measures taken to Protect Personal Data   | Envisaged Time Limits for Erasure of Personal Information (See CEC Records Retention Schedule for further details) |
| 26.02.01                        | Recording of requests made for fly tipping cleaning services                                    | Recording of service request   | System: Council Network<br>Paper based request records     | Structured                  | Requesters of Service        | No   | 6(1)(e) Official Authority vested in the controller (arising from various fly tipping legislation)  | None   | None                                     | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br>Hard copy files securely stored and access restricted to relevant staff. | 1 year   |
| <b>Part 3: Street cleaning</b>  |   |  |  |                             |                              |  |   |  |  |                                      |   |                                |  |  |
| 26.03.01                        | Recording of requests made for street cleaning services   | Recording of service request   | System: Council Network<br>Paper based request records     | Structured                  | Requesters of Service        | No   | 6(1)(e) Official Authority vested in the controller (arising from various street cleaning legislation)                                      | None   | None                                     | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br>Hard copy files securely stored and access restricted to relevant staff. | 1 year   |
| 26.03.02                        | Handling of complaints and enquiries made about Street Cleaning services                        | Investigation into and response to enquiries and complaints received by the Street Cleaning service                        | System: Council Network<br>Paper based complaints files    | Structured                  | Complainants                 | No   | 6(1)(e) Official Authority vested in the controller (arising from various street cleaning legislation)                                      | None   | None                                     | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br>Hard copy files securely stored and access restricted to relevant staff. | 1 year   |
| <b>Part 4: Waste collection</b> |   |  |  |                             |                              |  |   |  |  |                                      |   |                                |  |  |
| 26.04.01                        | Provision of Assisted Collection service to households who meet qualifying criteria             | Assessment of households qualification for assisted collection service and record of collection assistance to be provided. | System: Council Network<br>Paper based application records | Structured                  | Citizens                     | Yes  | 6(1)(e) Official Authority vested in the controller (arising from various Waste Management legislation)<br>9(2)(h) Provision of social care | None   | None                                     | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br>Hard copy files securely stored and access restricted to relevant staff. | 1 year   |
| 26.04.02                        | Operation of Garden Waste Collection Service for registered households                          | Households registered for green waste collection and service is provided and invoiced for per schedule of collections.     | System: Council Network<br>Paper based service records     | Structured                  | Citizens                     | No   | 6(1)(e) Official Authority vested in the controller (arising from various Waste Management legislation)                                     | None   | None                                     | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br>Hard copy files securely stored and access restricted to relevant staff. | 1 year   |
| 26.04.03                        | Investigation into vehicles left abandoned in the City of Edinburgh and removal where necessary | Investigation by CEC of vehicles which appear to have been abandoned in Edinburgh.   | System: Council Network<br>Paper based investigation files | Structured                  | Owners of abandoned vehicles | No   | 6(1)(e) Official Authority vested in the controller (arising from various Waste Management legislation)                                     | Vehicle Registration number shared with DVLA who provide details of the Registered Owner | DVLA                                     | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br>Hard copy files securely stored and access restricted to relevant staff. | 1 year   |

Record of Processing Activities as required by Article 30 of the General Data Protection Regulation and Section 61 of the Data Protection Bill

**Data Controller** The City of Edinburgh Council, Waverley Court, 4 East Market Street, Edinburgh, EH8 8BG  
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**Date Updated:** 09/02/2021  
**Scheduled Date of Next Review:** 01/03/2022  
**Version Number:** 2

| Ref      | Purpose of Processing   | Description of Processing   | Format of Data  |            | Categories of Data Subjects | Categories of Personal Data  | Does Processing include Special Categories of Personal Data? | Lawfulness of Processing Condition  | Disclosure and Transfer                         |  | Processing Activities                |   |                                | Security and Disposal  |  |
|----------|---|---|---|------------|-----------------------------|--|--|---|---|--|--------------------------------------|---|--------------------------------|--|--|
|          |   |   |   |            |                             |  |  |   | Categories of Recipients of Disclosure (if any) | Destination of Transfer of Data (if any) | Subject to Automated Decision Making | 3rd Party Data Processor Used   | Joint Data Controller (if any) | Technical & Organisational Measures taken to Protect Personal Data   | Envisaged Time Limits for Erasure of Personal Information (See CEC Records Retention Schedule for further details) |
| 26.04.04 | Handling of complaints and enquiries made about Waste Collection services including missed bin collection notifications | Investigation into and response to enquiries and complaints received by the Waste Collections service | System: Council Network<br>Paper based complaints files | Structured | Complainants                | Name;<br>Address;<br>Contact Details;<br>Complaint Details             | No   | 6(1)(e) Official Authority vested in the controller (arising from various Waste Management legislation) | None  | None                                     | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 1 year   |
| 26.04.05 | Operation of Bulky Waste Collection Service   | Households requesting bulky waste collection services   | System: Council Network<br>Paper based service records  | Structured | Citizens                    | Name;<br>Address;<br>Contact Details;<br>Payment Details (if relevant) | No   | 6(1)(e) Official Authority vested in the controller (arising from various Waste Management legislation) | None  | None                                     | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 1 year   |
| 26.04.07 | Operation of CCTV cameras on Waste Collection vehicles  | Capture of CCTV images from on vehicle CCTV cameras   | System: Council Network<br>Paper based service records  | Structured | Citizens                    | CCTV images of immediate surrounding of Waste Collection vehicle       | No   | 6(1)(e) Official Authority vested in the controller (arising from various Waste Management legislation) | None  | None                                     | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 30 days  |
| 26.04.08 | Operation of appointment system for access to Household Waste Recycling Centre  | Operation of appointment system during periods when the capacity of HWRC requires to be managed       | System: Council Network<br>Paper based service records  | Structured | Citizens                    | Name;<br>Address;<br>E-mail address;<br>Car registration number        | No   | 6(1)(e) Official Authority vested in the controller (arising from various Waste Management legislation) | None  | None                                     | No                                   | Yes - Providers of activity specific services and providers of ICT Services under CEC contract frameworks | None                           | ICT System Access Controls and ICT Security Protocols applied.<br><br>Hard copy files securely stored and access restricted to relevant staff. | 1 year   |

**Part 5: Waste disposal**

No processing of personal data takes place under this category of business.

**Part 6: Waste reduction**

No processing of personal data takes place under this category of business.