

## **Components of a Privacy Notice Internal Audit**

### **1. Who we are and what we do**

**Who we are:**

Durham County Council  
Resources  
Internal Audit

For the purposes of Data Protection, Durham County Council is the Data Controller for your information.

**What we do:**

Internal auditing is an independent, objective assurance and consulting activity designed to add value and improve the Councils operations. It helps the Council accomplish its objectives by bringing a systematic, disciplined approach to evaluate and improve the effectiveness of risk management, control and governance processes.

### **2. What type of personal information do we collect and how do we collect it?**

We may collect any personal information that all services / teams within the Council have collected and hold and this will be collected directly from the service / team.

The information collected for an audit review is limited to the purpose of the audit so it is not a licence to browse. The scope of each audit review is detailed in a Terms of Reference (TOR), which limits the scale of information that is examined, but enough to provide an independent opinion on whether or not controls are adequate, appropriate and effective in providing reasonable assurance that risks to the achievement of service/system/process objectives are being managed effectively.

### **3. What is our power to obtain and use the personal data?**

**Lawful Basis (Article 6)**

- processing is necessary for compliance with a legal obligation to which the controller is subject;
- processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;

**Conditions from Article 9**

When we collect special category personal information we rely on one of the following:

- processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security and social protection law;
- processing is necessary for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity;
- processing is necessary for reasons of substantial public interest,

#### **4. What is your personal information used for?**

Internal Audit is a statutory service in the context of the Accounts and Audit Regulations (England) 2011, which state that “A relevant body must undertake an adequate and effective internal audit of its accounting records and of its system of internal control in accordance with the proper practices”.

The Public Sector Internal Audit Standards (PSIAS) and CIPFA’s Local Government Application Note (LGAN), which came into effect April 2013, constitute proper practices to satisfy the requirements for larger relevant local government bodies as set out in the Accounts and Audit Regulations 2011 and in order to fulfil the role of providing an independent assurance that the Councils risk management, governance and internal control processes are operating effectively, the personal information collected by Council services / teams is reviewed / examined.

The purpose, authorities and responsibilities of the Internal Audit Service are formerly defined in the Internal Audit Charter.

An annual risk based audit plan is developed each year in consultation with senior managers and is approved by the Audit Committee and outlines audits reviews to be carried out. For each audit review the objectives and risks associated with that area are identified in a Control Risk Assessment (CRA) and the scope of the review is captured in a Terms of Reference (TOR), which is formally agreed with service managers. The TOR limits the scope and scale of personal data that is examined, but allows Internal Audit to provide an independent opinion on whether or not controls are adequate, appropriate and effective in providing reasonable assurance that risks to the achievement of service/system/process objectives are being managed effectively.

#### **5. Will your personal information be shared?**

We will share where required by law, however, the internal audit information is not shared.

#### **6. How do we keep your personal information secure?**

The security of your personal information is important to us. This is why we follow a range of security policies and procedures to control and safeguard access to and use of your personal information.

Examples of our security include:

- Encryption, meaning that information is hidden so that it cannot be read without special knowledge (such as a password). This is done with a secret code or what’s called a ‘cypher’. The hidden information is said to then be ‘encrypted’.
- Controlling access to systems and networks allows us to stop people who are not allowed to view your personal information from getting access to it.
- Training for our staff allows us to make them aware of how to handle information and how and when to report when something goes wrong.
- Regular testing of our technology and ways of working including keeping up to date on the latest security updates (commonly called patches).

## 7. How long will we keep your personal information?

After we deliver a service, we have to keep your information as a business record of what was delivered. The type service will determine how long we have to keep it. Our corporate retention guidelines [[insert hyperlink](#)] show how long we keep it for different services. This ranges from months for some records to decades for more sensitive records.

The retention periods for Internal Audit are as follows:

### ➤ Type of Information

- Activity file(s) created as part of the audit process, including the results of all tests carried out.
- Internal Audit staff records.

Note: These are the Audit staff records held in Galileo, not the prime HR document.

- Internal Audit staff timesheets held on Galileo.
- Flexi sheets
- Internal Audit Recommendations

### ➤ Retention Period

- Current financial year + 6 years or subsequent audit file closed (whichever is the latter).
- End of the financial year in which the member of staff leaves.

- Current financial year + 6 years
- Current financial year + 6 years
- Closure date + 6 years

Note: The closure date refers to when the action has been implemented, i.e.

- status = 'followed up' for high priority actions

- status = 'action completed' for all other actions

## 8. Is your personal information processed overseas?

We do not process your personal information outside the EEC.

## 9. Marketing (if applicable)

At no time will your information be passed to organisations external to us and our partners for marketing or sales purposes or for any commercial use without your prior express consent.

## 10. What are your Information Rights?

Your Information Rights are set out in the law. Subject to some legal exceptions, you have the right to:

- to have any inaccuracies corrected;
- to have your personal data erased;
- to place a restriction on our processing of your data;
- to object to processing; and
- to request your data to be ported (data portability).

**If you wish to exercise your information rights, please contact the Data Protection Officer at [DPO@durham.gov.uk](mailto:DPO@durham.gov.uk) or alternatively write to DPO, Room 143-148, Floor 4, County Hall, Durham County Council, DH1 5UF.**

You also have the right to request a copy of the personal information council holds about you. To do this, you can apply online or download an application form from the [DCC website](#) or you can contact the data protection team at [dataprotection@durham.gov.uk](mailto:dataprotection@durham.gov.uk)

To learn more about these rights please see the [ICO website](#).

If something goes wrong with your personal information, or you have questions about how we use it, please contact the Data Protection Officer at [DPO@durham.gov.uk](mailto:DPO@durham.gov.uk) or by calling 03000 268050.

If we have not been able to deal with your complaint, you can also contact the [Information Commissioner's Office](#):

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

**Telephone:** 0303 123 1113 (local rate) or 01625 545 745

**Fax:** 01625 524 510