

## **Newborough Parish Council**

### **Data Protection Policy**

1. This policy sets out how Newborough Parish Council will ensure that it complies with all the provisions of the General Data Protection Regulation (“GDPR”).

2. Personal data is any information about a living individual which allows them to be identified from that data (for example a name, photographs, videos, email address, or address). Identification can be by the personal data alone or in conjunction with any other personal data. The processing of personal data is governed by legislation relating to personal data which applies in the United Kingdom including the General Data Protection Regulation (the “GDPR”) and other local legislation relating to personal data and rights such as the Human Rights Act.

3. The Parish Council has access to the following personal data, stored in a variety of ways: -

- Parish Councillors’ personal e-mail addresses – normally used for all electronic correspondence between the Councillors and the Parish Clerk
- Parish Councillors’ home addresses and phone numbers, retained by the Parish Clerk
- Parish Councillors’ home addresses, sponsorship, contracts, employment details, licences, corporate tenancies, securities – declared every year on the Register of Councillors Interests, or more recently the Register of Member’s Interests form. Copies are retained by the Parish Council, East Staffordshire Borough Council and the information is published on the Newborough Village Website and the ESBC website
- Parish Clerk’s name, address and telephone number, and Parish Councillors’ names, addresses and telephone numbers, published on the Newborough Village website • Parish Clerk’s name, address and telephone number on all correspondence from the Parish Council.
- Parish Clerk’s salary details and contract of employment, held on file. Salary information shared with Payroll Administrator and HMRC, and included within Annual Accounts that are published on the Parish Website.
- All Parishioners’ names and addresses, recorded on the Electoral Roll, a copy of which is retained by the Parish Clerk.
- All letters from parishioners are held on file in a locked premises and all emails from parishioners are held on the Council’s laptop which has secure passwords and is regularly backed up.

4. The council will process some or all of the following personal data where necessary to perform its tasks:

- Names, titles, and aliases, photographs;
- Contact details such as telephone numbers, addresses, and email addresses;
- Where they are relevant to the services provided by a council, or where you provide them to us, we may process information such as gender, age, marital status, nationality, education/work history, academic/professional qualifications, hobbies, family composition, and dependants;

- The personal data we process may include sensitive or other special categories of personal data such as criminal convictions, racial or ethnic origin, mental and physical health, details of injuries, medication/treatment received, political beliefs, trade union affiliation, genetic data, biometric data, data concerning and sexual life or orientation.

5. The council will comply with data protection law. This says that the personal data we hold about you must be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about.
- Kept and destroyed securely including ensuring that appropriate technical and security measures are in place to protect your personal data to protect personal data from loss, misuse, unauthorised access and disclosure.

6. This section provides information about the third parties with whom the council may share your personal data: These third parties have an obligation to put in place appropriate security measures and will be responsible to you directly for the manner in which they process and protect your personal data. It is likely that we will need to share your data with some or all of the following (but only where necessary):

- Our agents, suppliers and contractors. For example, we may ask a commercial provider to publish or distribute newsletters on our behalf, or to maintain our database software;
- On occasion, other local authorities or not for profit bodies with which we are carrying out joint ventures e.g. in relation to facilities or events for the community.

7. You have the following rights with respect to your personal data: When exercising any of the rights listed below, in order to process your request, we may need to verify your identity for your security. In such cases we will need you to respond with proof of your identity before you can exercise these rights.

- The right to access personal data we hold on you
- The right to correct and update the personal data we hold on you
- The right to have your personal data erased
- The right to object to processing of your personal data or to restrict it to certain purposes only
- The right to data portability
- The right to withdraw your consent to the processing at any time for any processing of data to which consent was obtained.
- The right to lodge a complaint with the Information Commissioner's Office.

8. In the event of a personal data breach, i.e. one that leads to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to personal data, we will:

- Notify the Information Commissioners Office (ICO) using the ICO's online system:  
<https://ico.org.uk/fororganisations/report-a-breach/> and provide the following information:
  - o The potential scope and cause of the breach
  - o Mitigation actions the council plans to take
  - o Details of how the council plans to address the problem.
- Notify the Individual concerned if a breach is likely to result in a high risk to the rights and freedoms of individuals (such as through identity theft)
- Any personal data breach, which meets the GDPR reporting criteria, will be reported within 72 hours to the Information Commissioner.
- Notify the Parish Clerk and Councillors

9. We will keep this Policy under regular review: The next review is to take place in July 2019.

10. Any questions or concerns about this Policy or the personal data we hold about you or the operation of this policy should be addressed to The Parish Clerk, Newborough Parish Council.

Prepared by Councillor Bethan Waite

Adopted by Newborough Parish Council on 2nd July 2018 The Parish Clerk, Newborough Parish Council.