

# **ALVELEY AND ROMSLEY PARISH COUNCIL**

## **DATA PROTECTION AND PRIVACY POLICY**

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### **1. Introduction**

- 1.1 **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 which applies in the United Kingdom including the Data Protection Act 2018, the General Data Protection Regulation (the "GDPR") and other local legislation relating to personal data and rights such as the Human Rights Act.

### **2. Council information**

- 2.1 This Data Protection and Privacy Policy is provided to you by Alveley and Romsley Parish Council.
- 2.2 The Parish Council website is at [www.alveleyandromsleypc.org.uk](http://www.alveleyandromsleypc.org.uk). The Council's email address is [clerk@alveleyandromsleypc.org.uk](mailto:clerk@alveleyandromsleypc.org.uk). The Council's postal address is:

Clerk to the Parish Council  
Alveley and Romsley Parish Council  
43 Church View Gardens  
Kinver  
Stourbridge  
DY7 6EE

### **3. Data controller**

- 3.1 Alveley and Romsley Parish Council is the registered data controller (reference number A8372003).
- 3.2 There are not any joint controller arrangements with other organisations but the Parish Council is in periodic communication with other agencies, including:

- Other local authorities – Shropshire Council, neighbouring County or District Councils, Town and Parish Councils;
- Statutory bodies – Police Authorities, NHS Trusts, GP Fundholders, Fire and Rescue Authorities;
- Community and voluntary groups;
- Charities – national and local;
- Contractors.

These contacts may occasionally involve the transfer of personal data.

#### **4. Use of personal data by the Parish Council**

- 4.1 In most cases personal data held by the Parish Council will comprise contact details such as telephone numbers, addresses, and email addresses. The Parish Council will endeavour to ensure that personal data are accurate and up-to-date.
- 4.2 In very limited cases and only where they are relevant to the services provided by the Parish Council, or are provided by the individual or organisation concerned as necessary information, we may process additional data such as gender, age, marital status, nationality, education/work histories, academic/professional qualifications, hobbies, family composition, and dependants.
- 4.3 Where individuals, on their own behalf or acting for organisations, are involved in financial transaction e.g. grant applications, insurance claims, contracts, financial identifiers such as bank account numbers, payment card numbers, payment/transaction identifiers, policy numbers, and claim numbers may be processed.
- 4.4 On very rare occasions, the data we process may include sensitive personal data or other special categories of data such as 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 sex life or sexual orientation. Such data will be held only as long as it is required by the Parish Council to carry out its functions, or as long as prescribed by law.
- 4.5 The Parish Council will routinely receive and transmit personal data on paper or via email or telephone. However, the Council recognises that there are now other communication channels for personal data, including:
  - Websites;
  - Interaction with other IT software or services e.g. IP addresses, location information;
  - Social media.

The Parish Council will not use these channels to receive or transmit personal data unless there is no acceptable alternative. In these circumstances, the relevant communications and personal data content will be logged.

4.6 The Parish Council will not transfer personal data to countries or territories outside the European Economic Area (EEA) unless legally required to do so. However, the Council's website is accessible from overseas. Website content will be scrutinised to ensure that any personal data it contains does not go beyond name and, if necessary, postal and/or email address.

4.7 The Parish Council uses personal data for some or all of the following purposes:

- To deliver public services, to tailor services to meet the needs of individual users and to provide information to potential service users;
- To confirm the identity of service users;
- To contact local residents and others by post, telephone and email;
- To monitor outcomes and performance;
- To prevent and detect fraud and corruption in the use of public funds;
- To enable us to meet all legal and statutory obligations and powers including any delegated functions;
- To promote the interests of the Council;
- To maintain our own accounts and records;
- To meet requests for information from local residents;
- To process relevant financial transactions including grants and payments for goods and services supplied to the Council
- To analyse data which will help to plan the future provision of services.

4.8 If the Parish Council wishes to use personal data for a new purpose, not covered by this Privacy Policy, then it will provide those affected with a Privacy Notice explaining this new use before commencing the processing, and setting out the purpose and processing arrangements. Whenever necessary, the Council will seek prior consent to new procedures.

## **5. The Legal Framework and Compliance**

5.1 The Parish Council is a public authority and has certain powers and duties. Most personal data is processed to enable the discharge of these powers and duties. Sometime when exercising these powers or duties it is necessary to process personal data of residents or people using the Council's services.

5.2 The Parish Council will comply with data protection law. This says that the personal data we hold must be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to the data subject and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told the data subject about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the stated purposes.
- Kept and destroyed securely.

- 5.3 The Parish Council will ensure that appropriate technical and security measures are in place to protect personal data from loss, misuse, unauthorised access or disclosure.
- 5.4 Where the use of personal data requires the consent of the data subject, the Parish Council will obtain prior consent to that use.
- 5.5 Any third parties who share personal data held by the Parish Council also have an obligation to put in place appropriate security measures and will be responsible to the data subject for the manner in which they process and protect personal data. This includes agents, suppliers, contractors, other local authorities, and charitable or community groups.
- 5.6 The Parish Council will keep some records permanently if legally required to do so. Other records will be kept for an extended period of time. For example, it is current best practice to keep financial records for a minimum period of 8 years to support HMRC audits or provide tax information. The Council is also permitted to retain data in order to defend or pursue claims. In some cases the law imposes a time limit for such claims (for example 3 years for personal injury claims or 6 years for contract claims). In general, the Council will endeavour to keep data only for as long as it is needed.

## **6. Data Subject Rights**

- 6.1 Data subjects have the following rights with respect to their personal data:
  - The right to access their personal data held by the Council free of charge;
  - The right to correct and update their personal data;
  - The right to have their personal data erased;
  - The right to object to processing of their personal data or to restrict it to certain purposes only;
  - The right to data portability;
  - The right to withdraw at any time consent to the processing of data which has previously been given;
  - The right to lodge a complaint with the Information Commissioner's Office.
- 6.2 The Information Commissioners Office can be contacted on 0303 123 1113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF.

## **7. Changes to this policy**

- 7.1 This Privacy Policy will be kept under regular review and the Council will post any updates at [www.alveleyandromsleypc.org.uk](http://www.alveleyandromsleypc.org.uk). This Policy was last updated in September 2018.

## **8. Contact Details**

- 8.1 Please contact us if you have any questions about this Privacy Policy or the personal data we hold about, you or to exercise relevant rights, queries or complaints. The contact details are at paragraph 2.2 above.