



# Data Protection Policy

Adopted: 5<sup>th</sup> March 2018

Bradwell Parish Council, as a Data Controller, gathers and holds personal data about our employees, business contacts, suppliers, our service users and other individuals the Parish Council has a relationship with. We use the information for a variety of purposes.

This policy sets out how the Parish Council processes personal and sensitive data, obtaining data, storage, handling, transfer, deletion and disclosure of any paper or electronic data. The policy ensures that staff and Councillors understand the rules governing the use of personal data to which they have access in the course of their work. In particular, this policy requires the Parish Council to ensure that the Data Protection Officer (DPO) be consulted before any significant new data processing activity is initiated to ensure that relevant compliance steps are taken. At all times Bradwell Parish Council will comply with the provisions within the EU General Data Protection Regulation (EU 2016/679).

## Definitions

**Personal data:** Information relating to individuals that can identify them, such as job applicants, current and former employees, contract and other staff, clients, suppliers, service users, business contacts and other people the Parish Council has a relationship with or may need to contact. Personal data we gather may include: individuals' contact details, educational background, financial and pay details, details of certificates and diplomas, education and skills, marital status, nationality, job title, electoral register, details of customer's names, addresses and allotment plot tenants, databases of names, bank account details, CCTV footage and any other information held by the Data Controller. It even includes expressions of opinion about the individual. This list is not exhaustive.

**Sensitive data:** information about an individual's racial or ethnic origin, political opinions, religious or similar beliefs, trade union membership (or non-membership), physical or mental health or condition, criminal offences, or related proceedings.

## Where do we obtain the data?

Data is obtained through a variety of ways: contact details through emails; tenancy agreements; application and employee related forms; hire agreement with users of our facilities; business contacts; website users; surveys and from resident enquiries and complaints. This list is not exhaustive.

## Why do we process the data?

- Bradwell Parish Council processes the data for personnel, administrative, financial, regulatory, payroll and business development purposes.
- Compliance with our legal, regulatory and corporate governance obligations and good practice.

- Gathering information as part of investigations by regulatory bodies or in connection with legal proceedings or requests.
- Ensuring business policies are adhered to (such as policies covering email and internet use).
- Operational reasons, such as training and quality control, ensuring the confidentiality of commercially sensitive information, security vetting.
- Investigating complaints, checking references, ensuring safe working practices, monitoring and managing staff access to systems and facilities and staff absences, administration and assessments.
- Monitoring staff conduct, disciplinary matters.
- Marketing and improving the services we offer.

## How do we process the data?

Under guidelines in the EU General Data Protection Regulation (EU 2016/679), personal data must:

- Be processed fairly, lawfully and transparently
- Be obtained only for specified, explicit and legitimate purposes
- Be adequate, relevant and not excessive
- Be accurate and kept up to date
- Not be held for any longer than necessary
- Be protected with integrity and confidentiality
- Shall not be transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedoms of Individuals/Service Users in relation to the processing of personal information.

The Parish Council will take every effort to ensure that the above principles are built into its daily practices and activities.

## How long can data be held?

Bradwell Parish Council has a retention of documents and records management policy which governs how long personal data can be held.

## How is data protected?

Wherever possible Bradwell Parish Council has control measures in place that protect against unauthorised access to the offices and equipment through passwords, placing data under lock and key, having a confidentiality policy and training staff, Councillors and volunteers how to manage and respect data. This applies regardless of whether data is stored electronically, on paper or on other materials.

## Responsibilities

All staff, volunteers and Councillors have some responsibility for ensuring data is collected, stored and handled appropriately in line with this policy. Therefore Bradwell Parish Council will ensure that:

- As Data Controller, Bradwell Parish Council will be responsible for ensuring that data is collected where necessary, stored efficiently and securely and for how long.
- Everyone processing personal information is appropriately trained to do so and appropriately supervised
- The way in which personal data is gathered, held and managed will be regularly reviewed and audited.
- All staff are aware that a breach of the rules and procedures in this policy could lead to disciplinary action being taken against them and as such staff of the Council with responsibility for data processing/management, will act under the guidance of the Clerk of the Council.
- All councillors are aware of the principles of data protection, and agree that they will take every effort to ensure that once data is transferred to them, they engage in proper Data Protection practices.