

## SUTTON COURTENAY PARISH COUNCIL

### DATA PROTECTION

This policy sets out the Parish Council's rules on data protection and the legal conditions that must be satisfied in relation to the obtaining, handling, processing, storage, transportation and destruction of personal information.

Everyone has rights as to how their personal information is handled. These are contained within the Data Protection Regulations which come into effect from 25<sup>th</sup> May 2018 which supercedes the Data Protection Act 1998. The Parish Council will collect, store and process personal information about its staff, councillors, contractors, and residents, and will treat it in an appropriate and lawful manner.

#### **Data Held By the Council**

**Staff:** Address, telephone, email, paye, pension, CV, references

**Councillors:** Address, telephone, email, declarations of interests and in the case of applications for co-option CVs

**Contact by parishioners:** Address, telephone, email, letters and emails

**Parishioners who request copy agendas and minutes:** Address, email

**Contractors:** Address, telephone, letters, emails, references, quotations, contracts, insurance

**Minutes:** Information may be contained within the minutes. These are publicly available.

**Electoral Roll:** As supplied by the Vale of White Horse District Council. The data is password protected

The data is held for contract purposes, for carrying out of a public task, and for legitimate interest. Where data is held of those parishioners requesting copies of agendas and minutes, it is held by consent.

The data will not be kept longer than it is needed for its original purpose or anticipated needs. Data will be monitored so that only the data that is needed will be held.

Sutton Courtenay Parish Council does not normally share data with any other organisation or individual, except in legitimate circumstances for the carrying out of its functions as a local authority.

Data and records may be shared with Auditors, HMRC, Oxfordshire County Council and pension services, or other authorities such as a District Council, County Council or their elected members. The Council may share data it holds with other organisations in the case of suspected wrong doing or non payment of any debt owed to the Council. All other organisations must hold the data securely and in accordance with the General Data Protection Regulations.

#### **Subject Access Requests**

A formal request from a data subject for information that the Parish Council holds about them must be made in writing. Any member who receives a written request should forward it to the Clerk.

When someone makes a Subject Access Request he/she must prove they are that person or can legally act on his/her behalf. Two proofs of identify (one photographic) in the form of a passport, driving licence, utility bill, bank statement or similar should be provided.

## **Data Security**

The Council will ensure that appropriate security measures are taken to protect data held, both paper and electronic. The website host will hold data and information lodged regarding enquiries made via the website securely. An SSL Certificate will be required. Only the Proper Officer of the Council will have access to the data should it not be generally available, elsewhere. The Council will register with the Information Commissioner's Office. The Council will appoint a Data Protection Officer.

## **Data Breaches**

A personal data breach means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data. This includes breaches that are the result of both accidental and deliberate causes. The data held by the Council is in electronic and paper form. If anyone suspects that there has been a breach of data rules and regulations, he/she should report it to the Data Protection Officer. He/She will assess whether a breach has occurred, and if it has, whether the breach is likely to result in a high risk to the rights and freedoms of the data subject. Appropriate action will be taken according to the subject.

## **Privacy Notice**

A Privacy Notice as required by the GDPR will be displayed on the Council's website.