



EARLEY TOWN COUNCIL

DATA PROTECTION POLICY

Our Commitment

The processing of personal information is important to us and the Council understands the importance of ensuring that personal data, including sensitive personal data is always treated lawfully and appropriately and that the rights of individuals are upheld.

The Council will only collect, use and hold personal data about individuals for the purposes of carrying out our statutory obligations, delivering services and meeting the needs of individuals. This includes, service users, members of the public, current, past and prospective employees, Members of the Council, stakeholders and other local authorities, public bodies or law enforcement agencies.

The Town Council will only keep data for as long as it is necessary to do so, as per our Retention Schedule.

Our Objectives

In order to comply with the requirements of the Data Protection Act 2018, including the UK General Data Protection Regulation, the Council will ensure that:

- Personal data is collected, used and held, lawfully and processed for the purpose it is intended.
- Regular data sharing with external partners and other relevant agencies will be subject to information sharing agreements and will only be entered into with third party under a duty of confidentiality and they will be obliged to implement appropriate measures to ensure data security.
- External agencies undertaking any data processing on behalf of the Council will be required to demonstrate compliance with the Data Protection Act 2018 and will require measures to be in place to protect personal data.
- Staff are aware of their responsibilities when processing personal information.
- Training is provided to ensure that those handling personal data are trained appropriately.
- The Deputy Town Clerk is the appointed person who has knowledge in data protection compliance and who is a point of contact for all queries.
- Subject Access rights can be fully exercised and will be dealt with promptly.
- Any new projects being implemented that involves personal data to be subject to a Data Protection Impact Assessment (DPIA).
- We will review and update this policy, procedures and guidance for Council employees and Members on a regular basis.

We are required by law to share or make available some of the personal data we collect and hold. This information may be shared for a number of reasons to safeguard public funds and for the prevention and detection of fraud, and for the prevention and detection of crime. For more details on this please read our General Privacy Notice.

We will fully comply with the requirements of the Data Protection Act 2018 and are registered as a data controller with the Information Commissioner's Office. Our registration number is Z7740800.

Meeting our Objectives

In order to meet our objectives we will ensure that the following are always considered and that appropriate controls and procedures are in place to ensure compliance with the Data Protection Act 2018.

Collecting and Processing Personal Data

- When we collect personal data we will ensure that where required, we make individuals aware that their information is being collected, the purpose for collecting the data and whether it will be shared with any third parties. This will be done through the use of privacy notices.
- No new purpose for processing data will take place until the Information Commissioner's Office has been notified of the relevant new purpose and the data subjects have been informed and consent has been sought where required.

Data Security

- Council employees and members must report any suspected data breaches to the responsible officer for investigation and where necessary a responsible officer will notify the Information Commissioner's Office
- Council employees and members must use appropriate levels of security to store or share personal data. Training will be provided to employees and members
- When undertaking new projects involving personal data, a Data Protection Impact Assessment (DPIA) will be carried out by the Project Manager and reviewed by a responsible officer in order to assess any potential privacy risks.

An Information Asset Register will be maintained by the Town Clerk & Deputy Town Clerk identifying:

- all personal data held.
- where it is held.
- how it is processed.
- who has access to it.

Personal data will not be shared with a third-party organisation without a valid reason and where required an individual will be notified that the sharing will take place in the form of a privacy notice. If any new purposes for the data sharing are to take place, consent from the individuals concerned must be obtained.

When personal data is to be shared regularly with a third party, a Data Sharing Agreement must be implemented.

Any data sharing will also take into consideration:

- the statutory basis of the proposed information sharing.
- whether the sharing is justified.
- how to ensure the security of the information being shared.

Data Access

- Our employees and members will have access to personal data only where it is a requirement of their job role.
- All data subjects have a right of access to their own personal data and further detail on how to request or access personal data held by us can be found on our website.
- Our employees and members are aware of what to do when requests for information are made under the Data Protection Act 2018.
- Our employees and members are made aware that in the event of a Subject Access Request being received, their emails may be searched and relevant content disclosed.
- A Subject Access Request will be acknowledged to the data subject within 24 hours, with the final response and disclosure of information (subject to exemptions) within 40 calendar days.
- A Subject Access Request will not be responded to until the individual requesting the information can verify their identity.
- Third party personal data will not be released when responding to a Subject Access Request, unless consent has been obtained, it is required to be released by law, or it is deemed reasonable to release.

Data Protection Officer (DPO)

Earley Town Council's Data Protection Officer is the Deputy Town Clerk who is responsible for ensuring the council's compliance with data protection legislation and to inform and advise on the council's data protection obligations.

Compliance with this Policy

This Policy applies to all council employees, members and all individuals or organisations acting on behalf of the council.

Date of adoption: 27th July 2022

Date of review: July 2024