

RAMSBURY & AXFORD PARISH COUNCIL

PRIVACY & DATA PROTECTION POLICY

Who we are

Ramsbury & Axford Parish Council is a local authority and acts as the data controller for the personal data it processes.

Contact details

Clerk to the Council

Email: parishcouncil@ramsbury.org

Website: ramsbury.org.uk

Postal address: Parish Council Office, Ramsbury Memorial Hall, High Street, Ramsbury, SN8 2PB

Our Security and Confidentiality principles

Scope and responsibility

The Parish Council is committed to establishing and maintaining the security and confidentiality of information held by the Parish Council. This applies to all information, including personal data, held by staff, councillors, volunteers, and any individual or organisation under contract to the Parish Council. All those associated with the Parish Council have a legal responsibility to maintain the confidentiality, integrity and security of data held.

Security Measures

- **Secure storage:** All personal information will be kept in a secure location and not available for public access.
- **Access controls:** Electronic data is password protected; passwords are periodically changed and access limited to authorised staff and councillors.
- **Data disposal:** Personal data is monitored and shredded or deleted once it has served its purpose or is out of date.
- **Responsibility:** The Parish Clerk is responsible for the safe storage of personal data; councillors receive only the information necessary to carry out their duties.

Confidentiality Expectations of Staff & Councillors

When queries or complaints are made, the individual / organisation remains confidential unless they give permission otherwise. All staff and councillors are expected to support and adhere to the Parish Council's Privacy & Data Protection policy at all times.

Personal Data

What is Personal Data? Personal data means any information relating to an identified or identifiable living individual, including names, contact details, photographs, recordings, or online identifiers.

Examples of data we process

Depending on your interaction with the Parish Council, we may process:

- Names, titles and photographs.
- Contact details (address, email address, telephone number).
- Correspondence and communications.
- Information required to provide services or facilities (for example allotments, landhire).
- Financial information relating to payments, grants or reimbursements.
- Website usage data (IP address, browser type, device information, cookies).
- Images or recordings from public meetings or community events (where applicable).

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The Parish Council does not routinely collect special category data. Where it is necessary to do so, we will advise at the time of collection and it will be handled lawfully and with appropriate safeguards.

How we use personal data

We use personal data to deliver parish council services and facilities; respond to enquiries and correspondence; maintain accounts and records; meet legal and statutory obligations; administer meetings, consultations and events; improve parish council services and website content; and communicate information you have requested.

Lawful bases for processing

The Parish Council processes personal data under the following lawful bases as set out UK GDPR:

- Legal obligation – where processing is required by law.
- Public task – where processing is necessary to perform statutory duties as a local authority.
- Contract – Where processing is necessary for an agreement with you.
- Consent – where you have given clear permissions (which can be withdrawn at any time).

Data sharing

The Parish Council will only share personal data where it is lawful and necessary. This may include contractors or service providers working on behalf of the Parish Council, other local authorities or public bodies, and regulators or law enforcement agencies where required by law. All third parties are required to keep your data secure and process it only for the agreed purpose.

Data retention and disposal

The Parish Council retains personal data only for as long as necessary to fulfil the purpose for which it was collected, or to meet legal, audit or statutory requirements (for example financial and governance records). Data no longer required is securely destroyed. Further details are set out in the Parish Council's Document Retention Policy.

Data Protection Principles and Rights

It is the policy of the Parish Council to comply with the eight principles of Data Protection as set out below.

1. Data must be obtained fairly and lawfully

Information should be 'fairly processed' i.e. when information is collected. The Parish Council should be honest and open about why the information is required.

2. Data must be held only for the specific and lawful purposes and not processed in any matter incompatible with those purposes

The Parish Council must have a legitimate reason for processing the data. It will explain (in most case in writing) that the request is from the Parish Council and what the Parish Council intends to use the information for and to whom the Parish Council intends to give the personal data. This may be a specific third party, or may be a more general description such as "other Councils", etc.

3. Data must be relevant, adequate and not excessive for those purposes

The Parish Council will monitor the quantities of data held and ensure that they hold neither too much nor too little. The Parish Council will only hold the data that is needed.

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4. Data must be accurate and where necessary kept up to date

All personal data should be accurate, and it will be corrected if it is not.

5. Data must not be kept for longer than necessary

Only in exceptional circumstances should data be kept indefinitely. The Parish Council has a system of removal of different categories of data from its records after a certain period. For instance, when the information is no longer required for audit purposes. Data no longer needed will be shredded or securely disposed of.

6. Data is processed in accordance with the rights of individuals

Individuals must be informed, upon request, of all the information held about them. They can prevent the processing of data for direct marketing purposes.

7. Security precautions in place to prevent the loss, destruction or unauthorised disclosure of data

The Parish Council will ensure that there is adequate security for the data, taking into account the nature of the data and the harm to the data subject which could arise from disclosure or loss of data. A system of passwords is used to ensure that only staff or councillors who are authorised can gain access to personal data.

8. Not to transfer data outside the European Economic Area, unless you are satisfied that the country in question can provide an adequate level of security for that data.

The Parish Council is unlikely to have a requirement to transfer data overseas. but should it ever need to, the Parish Council will take all necessary steps it is able to to obtain the level of security to be applied to that data for you to make your decision on whether you are content to allow the transfer, notwithstanding if there is a legal requirement on the Parish Council to provide the data.

Your rights

Under data protection laws, you have to a right to:

- Access your personal data.
- Request correction of inaccurate or incomplete data.
- Request erasure of personal data (where applicable).
- Restrict or object to processing.
- Request data portability.
- Withdraw consent at any time (where consent applies).
- Lodge a complaint with the Information Commissioner's Office (ICO).

Information Commissioners Office (ICO) Contact Details:

Website: www.ico.org.uk

Telephone: 0303 123 1113

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Reporting Data Breaches

Immediate reporting: All staff and councillors should report immediately to the Clerk and Chairman of the Parish Council any observed or suspected security incidents, breaches of the Parish Council's security policies, or security weaknesses or threats to systems or services.

Response and notification: After any breach the Parish Council will investigate so that they can establish the cause and put corrective actions in place to prevent recurrence. If a data breach is identified that includes personal data the ICO must be informed.

How to request a Freedom of Information (FOI) or make a Subject Access Request (SAR)

To make a **SAR** or an **FOI request**, please contact the Clerk to the Council at **parishcouncil@ramsbury.org** or by post to **Parish Council Office, Ramsbury Memorial Hall, High Street, Ramsbury SN8 2PB** Provide your name, contact details, a clear description of the information you are requesting, and proof of identity where required. The Parish Council will acknowledge receipt and respond within the statutory timescales and according to the requirements of the ICO.

Review

This policy will be reviewed every three years from the date of the first adoption and thereafter from the date of the last ratified review by the whole Parish Council, or earlier if there are changes in legislation or following a security breach