



GENERAL DATA PROTECTION REGULATION POLICY (General Data Protection Regulation Act 2018)

Haydon Wick Parish Council have two Data Protection Officers – the Chief Officer and the Finance Officer and Deputy RFO who ensure that the Council are up to date with the latest regulations.

Privacy notice

Haydon Wick Parish Council is registered as a data controller under the General Data Protection Regulation Act 2018 (ICO registration Z7352658) as we collect and process personal information about you. This applies to Council staff and members of the public.

We process and hold your information in order to provide public services. This notice explains how we use and share your information. Information may be collected on a paper or online form, by telephone, email, CCTV or by a member of our staff, or one of our partners.

Why do we collect information about you?

We need to collect and hold information about you, in order to:

- deliver public services
- confirm your identity to provide some services
- contact you by post, email or telephone
- understand your needs to provide the services that you request
- understand what we can do for you and inform you of other relevant services and benefits
- update your customer records
- help us to build up a picture of how we are performing at delivering services to you and what services the residents need
- process financial transactions
- prevent and detect fraud and corruption in the use of public funds
- obtain your opinion about our services
- allow us to undertake statutory functions efficiently and effectively
- make sure we meet our statutory obligations including those related to diversity and equalities

We may not be able to provide you with a product or service unless we have enough information, or your permission to use that information.

The Council has always required a legal basis to processing personal data. The General Data Protection Regulations include five lawful bases for local councils. It is possible for more than one to apply at the same time. The five bases are:

- **Compliance with legal obligation:** The council is a public authority and has certain powers and duties. Most of your personal data is processed for compliance with a legal obligation which includes the discharge of the council's statutory functions and powers. Sometime when exercising these powers or duties it is necessary to process personal data of residents or people using the council's services. We will always take into account your interests and rights. This Privacy Policy sets out your rights and the council's obligations to you in detail.

- **Contractual necessity:** We may also process personal data if it is necessary for the performance of a contract with you, or to take steps to enter into a contract.

- **Consent:** Sometimes the use of your personal data requires your consent. On these occasions we will first obtain your consent to that use.

The other two legal bases that apply to the Parish Council are:

- **Vital interests:** It is possible to process personal information to protect an individual without their consent e.g. in a life or death situation where emergency contact information is needed.

- **Public Interest:** When the Parish Council is acting in the public interest, personal data may be processed if it is necessary to undertake the tasks.

How we use your information

We will use the information you provide in a manner that conforms to the General Data Protection Regulation Act 2018. We will commit to keeping your information accurate and up to date and not keep it for longer than is necessary. In some instances, the law sets the length of time information that has to be kept.

We will process your information for the following purposes:

- for the service you requested and to monitor and improve the Council's performance in responding to your request
- to allow us to be able to communicate and provide services and benefits appropriate to your needs
- to ensure that we meet our legal obligations
- where necessary for the law enforcement functions
- to prevent and detect fraud or crime
- to process financial transactions including grants, payments and benefits involving the Council, or where we are acting on behalf of other government bodies, e.g. HMRC, Department for Work and Pensions
- to collect monies owed to us

- where necessary to protect individuals from harm or injury
 - to allow the statistical analysis of data so we can plan the provision of services
- We will not pass any personal data on to third parties, other than by prior permission, to those who either process information on our behalf, or because of a legal requirement, and we will only do so, where possible, after we have ensured that sufficient steps have been taken to protect the personal data by the recipient.
- We will not disclose any information that you provide in confidence to us, to anyone else without your permission, except in the few situations where disclosure is required by law, or where we have good reason to believe that failing to share the information would put someone else at risk. You will be told about this.

We may process your information overseas using web services that are hosted outside the European Economic Area, but only with data processing agreements that meet our obligations under the Data Protection Act.

Information sharing

We may need to pass your information to other people and organisations that provide the service. These providers are obliged to keep your details secure and to use them only to fulfil your request. If we need to pass your sensitive or confidential information onto a third party, we will only do so once we have obtained your consent, unless we are legally required to do so.

We may disclose information to other partners where it is necessary, either to comply with a legal obligation, or where permitted under the General Data Protection Regulation Act 2018, e.g. where the disclosure is necessary for the purposes of the prevention and/or detection of crime.

Where we need to disclose sensitive or confidential information such as medical details to other partners, we will do so only with your prior explicit consent or where we are legally required to.

We may disclose information when necessary to prevent risk of harm to an individual.

At no time will your information be passed to organisations external to us and our partners, for marketing or sales purposes or for any commercial use without your prior express consent.

NHS Opt-Out

The Parish Council does not collect any health records that would be considered in scope for the NHS Opt-Out Scheme. As such the Council does not operate an Opt-Out Scheme.

Improving customer records

We constantly strive to make our record keeping more efficient and be able to provide relevant services in a timely fashion.

Basic customer records will comprise of your name, address, date of birth, gender, contact details (telephone/email), information which can be used to confirm your identity, a brief summary of your contact with the Council, an indicator of the services used, and where necessary a customer reference number. This will not contain extensive details of the services you have received, however, this will also enable us to amend any other database held, with changes to your address and contact information.

Detect and prevent fraud or crime

Haydon Wick Parish Council is required by law to protect the public funds it administers. We may use any of the information you provide to us for the prevention and detection of fraud. We may also share this information with other bodies responsible for auditing, administering public funds, or where undertaking a public function, in order to prevent and detect fraud. This includes all or any central government departments, other Local Authorities, HM Revenue and Customs and the Police.

Section 68 of the Serious Crime Act 2007 enables public authorities to disclose information for the purposes of preventing fraud, as a member of a specified anti-fraud organisation or otherwise in accordance with any arrangements made with such an organisation.

In limited situations we may monitor and record electronic transactions (website, email and telephone conversations). This will only be used to prevent or detect a crime, or to investigate or detect the unauthorised use of the telecommunications system and only as permitted by the Telecommunications (Lawful Business Practice) (Interception of Communications) Regulations 2000.

Emergency response management

Data matching may also be used to assist the Council in responding to emergencies or major accidents, by allowing the Council, in conjunction with the emergency services, to identify individuals who may need additional support in the event of e.g. an emergency evacuation.

Telephone calls

We will inform you if we record or monitor any telephone calls you make to us. If any recording takes place this will be used, to increase your security, for our record keeping of the transaction and for our staff training purposes.

Emails

If you email us we may keep a record of your contact and your email address and the email for our record keeping of the transaction. For security reasons we will not

include any confidential information about you in any email we send to you, unless you consent to this.

We suggest that you keep the amount of confidential information you send to us via email to a minimum and use our secure online form.

Using our website

If you are a user with general public access, the Haydon Wick Parish Council website (<http://www.haydonwick.gov.uk>) does not store or capture personal information, but merely logs a number called your IP address which is automatically recognised by the system.

The system will record personal information if you:

- subscribe to or apply for services that require personal information;
- report a fault and give your contact details for us to respond;
- contact us and leave your details for us to respond.

We employ cookie technology to help log visitors to our web site. A cookie is a string of information that is sent by a website and stored on your hard drive or temporarily in your computer's memory. The information collected is used for the administration of the server and to improve the service provided by the website. No personal information is collected this way. You can reject the use of cookies but you may be asked for information again, e.g. to participate in a survey.

This statement only covers the Council website maintained by us and does not cover other websites linked from our site.

CCTV/Surveillance

CCTV is installed on some of open spaces for the purposes of ensuring public and staff safety, monitoring building security and crime prevention and detection.

In all locations, signs will be displayed notifying you that CCTV is in operation and providing details of who to contact for further information about the scheme. Images captured by CCTV will not be kept for longer than necessary. However, on occasions there may be a need to keep images for longer, for example where a crime is being investigated.

You have the right to see images/audio recording of yourself in accordance with the General Data Protection Regulation 2018 and be provided with a copy of the images.

We will only disclose images and audio to other authorised bodies who intend to use it for the purposes stated above. Images and audio will not be released to the media for entertainment purposes or placed on the internet for public viewing.

We operate CCTV and disclose in accordance with the codes of practice issued by the Information Commissioner and the Home Office.

Please see our separate CCTV Policy for further details.

How we protect your information

Our aim is not to be intrusive, and we won't ask irrelevant or unnecessary questions. The information you provide will be subject to rigorous measures and procedures to make sure it can't be seen, accessed or disclosed to anyone who shouldn't see it.

We provide training to staff who handle personal information and treat it as a disciplinary matter if they misuse or do not look after your personal information properly.

We will not keep your information longer than it is needed or where the law states how long this should be kept. We will dispose of paper records or delete any electronic personal information in a secure way.

Your rights

You have the right to request that Haydon Wick Parish Council stop processing your personal data in relation to any Council service. However, this may cause delays or prevent us delivering a service to you. Where possible we will seek to comply with your request but we may be required to hold or process information to comply with a legal requirement.

We try to ensure that any information we hold about you is correct. There may be situations where you find the information we hold is no longer accurate and you have the right to have this corrected. Please contact the Council should you have a request for this to happen.

You are legally entitled to request access to any information about you that we hold, and a copy.

Further information

If you would like to know more please contact the Chief Officer/Clerk & RFO on 01793 722446, email clerk@haydonwick.gov.uk or write to us at:

Haydon Wick Parish Council
The Council Offices
Thames Avenue
Haydon Wick
Swindon
SN25 1QQ

Changes to this privacy notice

We will continually review and update this privacy notice to reflect changes in our services and feedback from service users as well as to comply with changes in the law. When such changes occur, we will revise the **last updated** date at the top of this notice.

Version Control

HWPC General Data Protection Regulations (GDPR) Policy	Georgina Morgan-Denn Chief Officer/Clerk & RFO	Approved at Full Council 16.2.21 Minute Ref: FC 217.5 Full Council 26.10.21 Minute Ref FC124C To be reviewed by Full Council 7 th May 2024.	As and when any updates are required NHS Opt- Out
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