RADWINTER PARISH COUNCIL

DATA PROTECTION POLICY

Adopted March 2026

Review Date 2027

Introduction

In order to conduct relevant business, services and duties as a public authority, Radwinter

Parish Council processes a range of data relating to its own operations and some which

it handles on behalf of partners. In broad terms, this data can be classified as:

- Data shared in the public arena about the services it offers, its mode of operations and other information it is required to make available to the public.
- Confidential information and data not yet in the public arena such as ideas or policies in the process of being decided.
- Information about other organisations that is confidential because of commercial sensitivity.
- Personal data concerning its current, past, and potential employees, councillors, and volunteers.
- Personal data concerning individuals who contact the Parish Council for information, to access its services or facilities or to make a complaint.

Radwinter Parish Council will adopt procedures and manage responsibly, all data which it handles and will respect the confidentiality of both its own data and that belonging to partner organisations it works with and members of the public. In some cases, it will have contractual obligations towards confidential data, but in addition will have specific legal responsibilities for personal and sensitive information under data protection legislation.

The Council will be as transparent as possible about its operations and will work closely with public, community and voluntary organisations. Therefore, in the case of all information which is not personal or confidential, it will be prepared to make it available to partners and members of the parish communities.

Details of information which is routinely available is contained in the Council's Publication Scheme which is based on the statutory model publication scheme for local councils.

Protecting Confidential or Sensitive Information

Radwinter Parish Council recognises it must at times, keep and process sensitive and personal information about employees and the public, it has therefore adopted this policy not only to meet its legal obligations but to ensure high standards.

GENERAL DATA PROTECTION REGULATIONS (GDPR) – Data Protection Act 2018

This policy is based on 'data protection principles defined in the 2018 Act. Data shall be:

* Used fairly, lawfully and transparently

* Used for specified, explicit purposes

* Used in a way that is adequate, relevant and limited to only what is necessary

* Accurate and, where necessary, kept up to date

* Retained no longer than is necessary and

* Processed in a manner that ensures appropriate security, including protection

against unlawful or unauthorised processing, access, loss, destruction or damage.

DEFINITIONS.

Data Subject – means the person whose personal data is being processed. This may be an

employee, prospective employee, councillor, resident. Other parties may include contractors, suppliers, contacts, referees.

Personal Data – means any information relating to a natural person or data subject that can be used directly or indirectly to identify a person. It can be anything from a name, a photo, and an address, date of birth, an email address, bank details, and posts on social networking sites or a computer IP address

Sensitive personal data – includes information such as:

Racial or ethnic background, political opinions, religious beliefs, trader union membership, medical information, sexual orientation, genetic and biometric data or information relating to criminal convictions and offences.

Data Controller – is a 'person' who determines the purposes for which and the manner in which any personal data is to be processed. A 'person' as recognised in law may be an individual, organisation or body of persons.

Data Processor – In relation to personal data, means any person (other than an employee of the data controller) who processes the data on behalf of the data controller.

Processing information or data – refers to any action involving personal information, including obtaining, viewing, copying amending, adding, deleting, extracting, storing, disclosing or destroying information

REASONS FOR PROCESSING PERSONAL DATA.

Radwinter Parish Council processes personal data in order to:

- Fulfil its duties as an employer by complying with the terms of contracts of employment, safeguarding the employee and maintaining information required by law.
- Pursue the legitimate interests of its business and its duties as a public body, by fulfilling the contractual terms with other organisations, and maintaining information required by law
- Monitor its activities including the equality and diversity of its activities.
- Fulfil its duties in operating any of its business premises including security.
- Assist regulatory and law enforcement agencies.
- Process information including recording and updating details about the Councillors, employees, partners and volunteers.
- Process information including the recording and updating details about individuals who contact it for information, or to access a service, or make a complaint.

• Undertake surveys, censuses and questionnaires to fulfil the objectives and purposes of the Council.

• Undertake research, audit and quality improvement work to fulfil its purposes

• Carry out Council administration.

Where appropriate and governed by necessary safeguards we may carry out the above processing jointly with other appropriate bodies from time to time.

The Council will ensure that at least one of the following conditions is met for personal Information to be considered fairly processed:

• The individual has consented to the processing

• Processing is necessary for the performance of a contract or agreement with the individual

• Processing is required under a legal obligation

• Processing is necessary to protect the vital interests of the individual

• Processing is necessary in order to pursue the legitimate interests of the data controller or third parties.

Particular attention is paid to the processing of any **sensitive personal information** and the Parish Council will ensure that at least one of the following conditions is met:

• Explicit consent of the individual

• Required by law to process the data for employment purposes

• A requirement in order to protect the vital interests of the individual or another person

RESPONSIBILITIES

Radwinter Parish Council is the Data Controller and must ensure that any processing of personal data for which they are responsible complies with the Act.

The Data Protection Officer is the Parish Clerk, who acts on behalf of the Council and is responsible for:

(i) Fully observing conditions regarding the fair collection and use of information

(ii) Meeting the Council's legal obligations to specify the purposes for which information is used.

(iii) Collecting and processing relevant information, only to the extent that is required to fulfil operational needs to comply with legal requirements

(iv) Applying strict checks to determine the length of time that information is held.

(v) Ensuring that the rights of the people whose information is held are able to be fully exercised under the Act.

(vi) Taking appropriate technical and organisational security measures to safeguard personal information

INFORMATION PROVIDED BY US

Personal information such as name, address, email address, phone number provided to Radwinter Parish Council, will be processed and stored so that it is possible for the Council to contact, respond to or conduct the transaction requested by the individual.

By transacting with Radwinter Parish Council, individuals are deemed to be giving consent for the personal data they have provided to be used and transferred in accordance with this policy, however wherever possible specific written consent will be sought. It is the responsibility of those individuals to ensure the Parish Council can keep their personal data accurate and up to date. The personal information will not be shared or provided to any other third party or be used or any purpose other than that for which it was provided.

THE COUNCIL'S RIGHT TO PROCESS INFORMATION

General Data Protection Regulations (and Data Protection Act) Article 6 (1) (a) (b) and (e)

- Processing is with consent of the data subject, or
- Processing is necessary for compliance with a legal obligation
- Processing is necessary for the legitimate interests of the Council

INFORMATION SECURITY

The Parish Council cares to ensure the security of personal data. We make sure that your information is protected from unauthorised access, loss, manipulation, falsification, destruction or unauthorised disclosure. This is done through appropriate technical measures and appropriate policies. It will only keep data for the purpose it was meant for and only for as long as is necessary, after which it will be deleted.

ACCESS TO INFORMATION

Any employee, councillor, resident have a right to:

(i) Ask what personal information the Council holds on them

(ii) Ask what this information is used for

(iii) Be provided with a copy of the information

(iv) Ask that any incorrect data held is corrected.

EMAIL CONTACT PRIVACY NOTICE

When you contact us

The information you provide (personal information such as name, address, email address,

phone number, organisation) will be processed and securely stored to enable us to contact

you and respond to your correspondence, provide information and/or access our facilities

and services. Your personal information will not be shared or provided to any third party.

We will only keep your data for the purpose it was collected for. You may request the deletion of your data held by Radwinter Parish Council at any time.

We will not knowingly process any data relating to a child (aged under 13) without the express parental / guardian consent of the child concerned.

You have the right to request access to the information we have on you. You can do this by contacting Radwinter Parish Council Data Information Officer/ Clerk: Julie Pledger via the above contact details.

If you believe your data is not being processed for the purpose it has been collected for, you may object.

Please use the following contact details:- Clerk@radwinterparishcouncil.gov.uk