

WHITBOURNE PARISH COUNCIL

Privacy Notice for staff, councillors and role holders

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Next review: May 2027

This notice applies, so far as relevant to the particular relationship, to applicants, employees, workers, agency staff, councillors, volunteers, contractors, other Council role holders and former members of those groups. It does not mean that the Council processes every category of information for every person.

Your personal data – what is it?

“Personal data” is any information about a living individual which allows them to be identified from that data (for example a name, photograph, video, email address, or address). Identification can be directly using the data itself or by combining it with other information which helps to identify a living individual (e.g. a list of staff may contain personnel ID numbers rather than names but if you use a separate list of the ID numbers which give the corresponding names to identify the staff in the first list then the first list will also be treated as personal data). The processing of personal data is governed by legislation relating to personal data which applies in the United Kingdom including the UK GDPR and the Data Protection Act 2018.

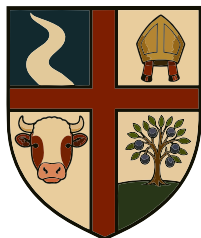
Who are we?

This Privacy Notice is provided to you by Whitbourne Parish Council, which is the data controller for your data.

The Council may use service providers acting as processors under contract and may share information with independent controllers where necessary and lawful. Another organisation is a joint controller only where it and the Council actually determine the purposes and means together; any such arrangement will be documented and its essence made available.

The Council will comply with data protection law. This says that the personal data we hold about you must be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about.
- Kept and destroyed securely including ensuring that appropriate technical and security measures are in place to protect your personal data to protect personal data from loss, misuse, unauthorised access and disclosure.



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What data do we process?

Depending on the relationship and activity, we may process:

- identity and contact details;
- recruitment, appointment, employment, role, training and qualification records;
- correspondence, declarations and governance records connected with the role;
- payment, tax and expenses information where applicable;
- emergency-contact, health, absence or adjustment information where necessary; and
- records needed to manage the relevant relationship and meet legal duties.

We do not process every category for every person.

Why we use personal data and our lawful bases

Employment and engagement: we may use personal data for recruitment, appointment, contractual administration, pay and expenses where applicable, health and safety, training, performance, absence, grievance or disciplinary processes, termination and legal claims. The usual bases are contract or steps before contract and legal obligation.

Councillors and governance role holders: we may use personal data for statutory and governance functions, declarations and registers, meeting administration, training, communications, approved expenses and records management. The usual basis is public task or official authority, with legal obligation, contract or consent used only where applicable.

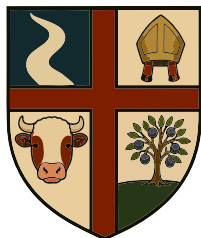
Volunteers and contractors: we may use personal data to appoint and administer the role, communicate, meet health and safety or safeguarding duties where applicable, make authorised payments and manage Council records. The basis depends on the activity and may be contract, legal obligation, public task or consent.

Where information is required by law or contract, we will explain the consequence of not providing it. We record the purpose and Article 6 lawful basis for each activity and do not assume that an employment basis applies to councillors, volunteers or every role holder.

Special-category and criminal-offence data

We process special-category personal data only where it is necessary for a defined activity and after recording both the Article 6 lawful basis and an applicable Article 9 condition. We process criminal-offence data only where necessary and after recording the Article 6 basis and the applicable Article 10 official authority or Data Protection Act 2018 Schedule 1 condition.

Where a Schedule 1 condition requires it, the Council will maintain an Appropriate Policy Document and the associated records. We will apply additional confidentiality and access controls appropriate to the information. This notice does not mean that the Council routinely processes these categories. If we rely on explicit consent, we will explain the request and the right to withdraw consent.



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Sharing your personal data

We share personal data only where necessary and lawful with relevant processors, professional advisers, public authorities and other independent controllers relevant to the activity. We will identify actual recipients or categories of recipient in the information for that activity. A recipient is not a joint controller merely because it works with the Council.

How long do we keep your personal data?

We retain personal data in accordance with the Council's approved retention arrangements, applicable legal duties and the need to establish, exercise or defend legal claims. The applicable retention period, or the criteria used to determine it, will be provided for the relevant processing activity on request. We securely delete or anonymise personal data when it is no longer required.

Your responsibilities

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your working relationship with us.

Your rights and your personal data

Depending on the circumstances and the lawful basis used, you may have rights of access, rectification, erasure, restriction, objection and data portability. You may also withdraw consent at any time where consent is the basis for processing. Withdrawal does not affect processing carried out before withdrawal.

Some rights do not apply in every case; for example, data portability does not apply to processing necessary for the Council's public tasks. We may ask for proportionate evidence of identity only where we have reasonable doubts about identity.

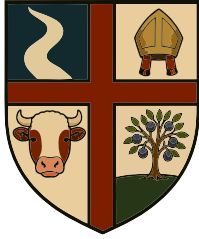
Right to object

Where we process personal data because it is necessary for a public task or the exercise of official authority, you have the right to object on grounds relating to your particular situation. We will stop the processing unless we demonstrate compelling legitimate grounds which override your interests, rights and freedoms, or the processing is needed for legal claims.

You may exercise a right by contacting the Clerk using the details below. We will respond in accordance with the UK GDPR and will explain any limitation or refusal.

Data-protection complaints

You may make a data-protection complaint to the Clerk by email or post using the contact details in this document. We will facilitate the making of complaints, acknowledge receipt within 30 days, take appropriate steps to investigate and respond without undue delay, keep you informed of progress where appropriate, and tell you the outcome. You may also complain to the Information Commissioner's Office (ICO). Current ICO contact details are available at <https://ico.org.uk/make-a-complaint/>.



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International transfers

If we make a restricted transfer of personal data outside the United Kingdom, we will ensure that it is covered by UK adequacy regulations, appropriate safeguards or an applicable exception. Where required, we will complete the data protection test and will provide information about the safeguard on request. The fact that information on the Council's website can be viewed from overseas does not, by itself, mean that the Council has made a restricted transfer.

Further processing

Before using personal data for a new purpose, we will identify a lawful basis, assess compatibility where required and provide updated privacy information where the UK GDPR requires. Consent will be sought only where it is the appropriate lawful basis.

Changes to this notice

We keep this notice under regular review and publish the current version on the Council's website. The controlled version will state its issue date, version and next review date.

Contact details

Whitbourne Parish Council is the controller. For data-protection enquiries, rights requests and complaints, contact the Clerk, Whitbourne Parish Council, Stockings Barn, Whitbourne, Herefordshire WR6 5SR. Email: whitbournepccclerk@outlook.com. The Council will publish the contact details of a data protection officer only if it appoints one.