

DATA PROTECTION POLICY

1. Background and relevance

The General Data Protection Regulations (GDPR) came into force on the 25th May 2018 and the Office of the Information Commissioner expects data controllers to be compliant before that date. This Act replaces the Data Protection Act 1998. The Act applies to 'personal data' that is data relating to a living person who can be identified from that data. 'Processing data' means any operation performed on that personal data such as collection, recording, use.

The Parish Council does have data that relates to living individuals and does process data.

2. Information Audit

The type of information the Council holds tends to be limited to name, address, telephone number and email address. More detailed information is held for employees & councillors, (e.g. staff employment details & contracts, councillors' election registration forms & Registers of Interests – these Registers are published in full on the Wokingham Borough Council (WBC) website).

In the normal course of business, the Parish Council will receive personal data in connection with the following:

- Administration of the allotments – tenants' details
- Administration of the recreation ground – user groups
- Administration of employment matters – data shared with HMRC and Pension Provider
- Correspondence sent to the Council – email, telephone, letter
- Contact details for local organisations – data shared with webmaster, Village Society
- Contact details and information relevant to Leases and user agreements – data shared with Borough Solicitor, sometimes Land Registry
- Information supplied for the council website
- Information supplied for inclusion in Hurst Village Society Newsletters

Data relating to professional or business details in connection with the following:

- Auditing – data shared with external & internal auditors
- Insurance
- Contact details & business information from suppliers & contractors

Note: The Council is sent a copy of the electoral register with updates through the year. The Data Protection issues associated with the electoral register are the responsibility of WBC. The SNHPC does not permit any third party to view the document.

3. Sensitive data

The Act requires 'sensitive data' to be treated differently. Categories of sensitive data includes racial or ethnic origins, political opinions, religious beliefs, health issues. The Parish Council does not collect such data. Where the Council carries out village wide surveys, such as in the Neighbourhood Plan or a Parish Plan, the responses are anonymous and questions are not generally asked on a topic that is classified as sensitive.

Services relating to children – the Council does not have any services directly relating to children. It is aware that should that circumstance change, the relevant Data Protection issues will need to be taken into consideration.

4. Storage of data

All council paper documents are stored in locked cabinets in the parish office. All computer records are stored on a password protected computer with anti-virus software. The Parish Council utilises cloud storage.

5. How the data is used

Data is only used for the purpose it has been supplied. Data is not passed onto a third party without the express consent of the data subject. The Council does not routinely share data. It does not sell data.

6. Subject access requests

A request for a copy of information held can be made. There is a prescribed process. Response time will reduce to one month under the new GDPR.

7. Data Protection Officer (DPO)

The Council's appointed DPO is Mr Andrew Moulton, Assistant Director Governance, WBC.

8. Key Tasks

The SNHPC has completed the following key tasks:

- a data audit schedule which will be the subject of on going review and update as necessary;
- the production of a data privacy statement; and
- Councillors have all signed a GDPR Consent Form which are held by the Clerk.



