



Twyford Parish Council

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General Data Protection Regulation Policy

Version 1	Author Jo Nicholson	Approved xx.xx.xxxx

1. Twyford Parish Council requires its members and employees to comply with the General Data Protection Regulation (GDPR) which comes into force on 25 May 2018. Under no circumstances should a councillor, or the clerk, pass on personal information, obtained in connection with their official duties, without the express consent of the individual concerned.
2. Personal data shall be obtained only for one or more specified and lawful purposes, and shall not be further processed in any manner incompatible with that purpose or those purposes. A Privacy Notice is available on request from the Clerk, and the Parish Council website.
3. Personal data shall be adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed. It should be accurate and kept up to date.
4. Personal data shall not be kept for longer than is necessary and should be processed in accordance with the rights of data subjects, under the GDPR.
5. Appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data.
6. Personal data shall not be transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.
7. A monitoring officer will be responsible for ensuring the implementation of the policy, and be the facilitator for any Subject Access Requests and report a data

breach should it occur. The monitoring officer will schedule an annual review of the data audit to ensure compliance with the policy, including retention and deletion.

8. Any personal data breaches must be reported to the monitoring officer, which must be reported to the ICO within 72 hours of the breach.
9. Any Contractor appointed by the Council must be checked for compliance with GDPR
10. Any new project undertaken by the Council must account for GDPR compliance.
11. All Channels will be reviewed for Compliance, including the website, emails, voice mails and written letters.

Supporting information

Item 1. Consent must be affirmative, and explicitly opt in to allowing their data to be shared, with a clear purpose outlined for it's use.

Members of public will not be named in Minutes or published documents, instead a reference point will be made, but without anyone being able to identify the individual involved.

Item 4. The GDPR includes the following rights for individuals;

a) the right to be informed

Fair processing information to be given, usually through the privacy notice. Individuals have a right to know the data retention period (how long we keep it for)

b) the right to access (includes subject access requests, SAR).

If a SAR is received by the Council, we must respond within one calendar month of receipt of the request. There is no fee in making the request. The monitoring officer has the right to be able to refuse a SAR or charge a reasonable fee, that are manifestly unfounded, excessive or repetitive.

c) the right to rectification (correction). Individuals have the right to have their personal data corrected if it is inaccurate or incomplete.

d) the right to erasure (also known as the right to be forgotten). Data subjects have the right to request removal of their personal data if it is no longer necessary to process their data. If the purpose for collecting the data still exists then a person will not be able to request the deletion of that data, unless it was given by consent and they are withdrawing their consent. If data is deleted, ensure it is not retrievable.

e) the right to restrict processing (if they believe the data is inaccurate or they object to the processing).

If this is the case, you can store the data but cannot otherwise use the data.

f) the right to data portability

Data subjects can request that their personal data be provided to them in a machine readable portable format. So long as other personal details of other data subjects is not compromised.

g) the right to object

If the Council has obtained data without consent

h) the right not to be subject to automated decision making including profiling

Provides protection against the risk that a potentially damaging decision is taken without human intervention.

Item 5

Electronic files including personal data will be securely stored

Paper files including personal data to be accessed via a lock

Data will not be willingly given to any other person outside of the Parish Council without prior approval by the monitoring officer, or Chairman.

Computers will be installed with up to date anti-virus software.

Item 7

Prior to the deletion of files, approval must be obtained by the monitoring officer or Chairman.

Item 8

It is the councils duty, in event of a data breach to detect, report and investigate. A data breach includes the forwarding of an email to a wrong recipient, loss of memory stick, or loss of lap top or mobile phone. The monitoring officer needs to decide if an incident should be reported to the ICO or not.

Item 9

Recognise when others are processing data for the council and make sure they do it securely. Contracts are to be updated to include GDPR clauses and put in place an audit programme to supervise them. A written contract must impose the obligations on processors.

NB. The Council does not have any direct dealings with children. Should that change, consent must be given by a Guardian for any child under 16