

Cold Aston Parish Council

Management of Information Policy

Adopted on the 20th June 2018 to be reviewed June 2021

Data Protection Officer is Cllr P Marchant

Cold Aston Parish Council (Data Controller) collect the following types of information;

- Contact details, specifically names addresses, email addresses & telephone numbers
- Both sensitive & special categories of data for employees
- Those who pay the Council for services such as allotment rentals; bank account numbers

All of the information is kept;

- on a computer which is password protected and has up to date anti virus software
- On a backup hard drive that is locked in a filing cabinet
- On paper that is kept locked in a filing cabinet.
- In password protected accounts such as email account or access to the Electoral Role

Who has access?

- The Parish Clerk & Responsible Finance Officer
- The Chair
- Other Councillors on a need to know basis
- Councillors, staff, the Council's contractors and agents shall not disclose confidential information or personal data without legal justification

Retention & Safe Destruction of Information

All information will be deleted electronically and paper copies shredded

- All financial records shall be kept for a minimum of 8 years there after all records pertaining to the paying of invoices will be destroyed
- Special categories information will be destroyed after 8 years
- All contact details will be reviewed annually and destroyed if no longer required or parishioners have not opted into email contact list

- If the Parish Clerk and/or Responsible Finance Officer leaves employment with the Council they will back up all information contained on their computer to the hard drive and then delete all records

Personal Data Breach

If there is a breach of personal data the following persons should be informed

- The Parish Clerk
- The Data Protection Officer
- The Chair
- The Vice Chair
- The person/s or organisations whose personal data it is
- Information Commissioners Office

The following actions should be taken;

- Change any online or PC passwords
- Inform your insurance Company if necessary
- Inform your Bank if necessary
- Inform the police if necessary
- Write down the facts stating date time and persons affected in the Breach of Data Record Book

How to respond to an individual exercising their statutory rights concerning their personal data.

An individual who wants to exercise this right has to put their objection in writing to The Council stating what they require The Council to do to avoid causing damage or distress. This could be financial, physical harm, and or emotional or mental pain

An individual can only object to The Council processing their own personal data. They must prove how it is causing them unwarranted and substantial damage or distress

An individual has no right to object to processing if:

- they have consented to the processing;
- the processing is necessary:
- in relation to a contract that the individual has entered into; or
- because the individual has asked for something to be done so they can enter into a contract;
- the processing is necessary because of a legal obligation that applies to you (other than a contractual obligation); or
- the processing is necessary to protect the individual's "vital interests".

Cold Aston Parish Council will respond within 21 days of receiving the objection to processing. The response will state what the Council intend to do and, if The Council do not intend to comply with the state their reasons for doing so.

All objections will be recorded along with dates received and the Council's response and the date sent.