

St Paul Malmesbury Without Parish Council

DATA PROTECTION PROCEDURES

This procedure document is to be followed by the Clerk and Councillors of St Paul Malmesbury Without Parish Council (the Council). It sets out the steps to be followed so that the Council can comply with its General Privacy Policy.

Personal data is to be understood as anything that can identify an individual; for example, name, home address, email address and phone numbers.

Clerk

As the repository of Council business related personal data; whether electronic or hard copy; you should keep this securely but in straightforwardly retrievable way. It must only be kept for as long as is needed to carry out the purpose for which it was collected. Once it becomes redundant it should be deleted/destroyed confidentially.

You should use only the Council laptop to store electronic information and either that or the Council mobile phone to communicate.

Your laptop should be backed up monthly after each Council meeting. Once that has been done, the previous month's back-up should be deleted.

Where possible, documentation should only be kept electronically. Any documentation that has to be in hard copy should be kept confidentially in locked storage.

When a member of the public, a contractor etc, contacts the Council:

- If it is a one off query, respond without recording any personal details. If the person contacted you by email, delete the email once the transaction is concluded
- If it is a query that will require you to undertake more work before responding, and/or which will require the sharing of the personal data with Councillors or Wiltshire Council, and/or where the person's role means that they may have longer term business with the Council. As most Council business is conducted by email, this should be achieved by the embedding of this information in the Clerk email 'signature'. Send them a copy if requested

- In recording public attendance or participation at a Council meeting do not record names; just number of attendees, or, if relevant, 'a member of the public spoke to the item/gave a view'

In case a person requests to see what information we hold about them, you should maintain a running database of individuals on whom we hold personal data, which should record:

- what information we hold (eg, that it is their home address, email address etc)
- where this is stored, to enable ease of retrieval if requested. If relevant, this should always include the name of the Cllr taking the lead on this issue who may retain the person's details during the course of the piece of work
- and that the person has been made aware of the General Privacy Policy

When an issue is closed and the person has their personal information deleted/destroyed, this database should be amended accordingly. The monthly back up process should ensure that personal information is deleted regularly, but you should check the running record annually to ensure that no unnecessary personal data remains. You should also check back with the associated Cllr(s) that they have also deleted the personal data from their own records.

Councillors

The main principles to be followed are:

The Parish Clerk should be the main person through whom correspondence is routed, and who manages the data base recording what personal data is being stored.

You should only hold actively relevant personal data and only of those who have been made aware of the General Privacy Policy. This must be kept securely but in straightforwardly retrievable way, whether electronic or hard copy. It must only be kept for as long as is needed to carry out the purpose for which it was collected.

To achieve these principles:

- Ensure that Council business is only undertaken on computers with up to date virus protection.

- When sending e mails to more than one person use 'blind copy' (bcc) unless there are explicit reasons to share e mail addresses.
- Always ensure that if you are contacted directly, rather than via the Clerk, the person is aware that the Council's privacy policy can be viewed on the website or that they can be sent a copy.
- Unless you are actively working on an issue that requires you to store a person's personal details you should either destroy any such information in a confidential manner or; if it is information that is likely to be needed again, such as the home address of a neighbouring Parish Clerk; pass this information to the Clerk for storage.

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