

# **Contin Community Council Data Protection Policy and Procedures**

## **Introduction**

Contin Community Council requires to gather personal data about some persons in the course of its business. These persons include Councillors, applicants for micro-grants, local government partners, contractors and other people the organisation may need to contact. This policy describes how this personal data will be collected, handled, and stored, in line with our legal obligations under the General Data Protection Regulation. The Contin Community Council takes Data Protection seriously. We are registered with the Information Commissioner's Office, Reg. No. ZA139127.

## **Data Protection Principles**

Contin Community Council is committed to the Data Protection Principles set down in the GDPR to ensure personal data is:

- a) processed lawfully, fairly and in a transparent manner in relation to individuals;
- b) collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes;
- c) adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- d) accurate and, where necessary, kept up to date;
- e) kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; and
- f) processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

The GDPR includes the following rights for individuals:

- the right to be informed; • the right of access; • the right to rectification; • the right to erasure; • the right to restrict processing; • the right to data portability; • the right to object; and • the right not to be subject to automated decision-making including profiling.

Individuals should contact the Contin Community Council should they have any queries in the first instance. They can also contact the ICO if they have a complaint or concern which is not satisfied by the Council's response or if they have a serious concern.

## **Responsibilities**

It is the responsibility of all Councillors to ensure this policy is followed and for the Data Controller to ensure that procedures regarding breaches and deletion of data are followed.

## **Data Mapping**

The CCC have undertaken a data mapping exercise to determine what personal information is held, where, and the basis upon which we hold it. See the Appendix for more details. Most of our data is held for reasons of legitimate interest and contract. We do not currently intend to contact individuals for reasons requiring opt-in consent, i.e. for marketing. However, we will review this if and when any situation arises.

## **Privacy Impact Assessments**

It is not expected that we will process any sensitive information, but the CCC are aware of this requirement and will conduct Privacy Impact Assessments (PIAs) if necessary.

## **Data Breaches**

Councillors will report any suspected breach or loss of personal data to the Data Controller within two working days of discovery. The Data Controller will record the data breach in a data breach log, investigate, and inform the ICO and the individual(s) concerned if necessary. A record of improvements to be made to policy will be kept. Data breaches should be raised as an agenda point at the next meeting.

## **Data Storage**

All personal data will be stored by the Councillors in the course of their business in password protected files and/or on password protected personal computers / laptops. Paper files will be stored in a locked cabinet.

## **Data Retention Periods**

### **Micro-grants**

Personal data which is required for the application and granting of micro-grants will be stored until the next AGM. Once the Chair has reported on the grants for the year, the grant awards will be stored in a spreadsheet with no personal data, and the original application form will be destroyed.

### **Councillor Data**

The Councillor contact detail sheet will be amended by the Secretary as soon as possible and within one month of resignation of a Councillor. The previous version of the document will be deleted.

### **Contractors**

Personal information about contractors should be stored until the next AGM, details of any works complete transferred to a reporting spreadsheet with no personal data and any personal data deleted.

### **Deletion Protocol**

Councillors will not keep any data which is not required for Council business and will delete as soon as is possible and within one year. The Data Controller will remind all Councillors before the AGM to complete a deletion task of all data which is not required from their personal computers / laptops / paper files. All Councillors will confirm that this has been completed at the next AGM and this will be minuted.

### **Archiving in the Public Interest**

Any data that Councillors consider to be of significant historical interest in the future will be stored on paper and sent to the Archive Centre. This should be done as soon as the project has been completed.

### **Retention of Minutes and Financial Records**

We are legally obliged to retain financial records for 7 years and minutes of meetings for 5 years. After this time, they will be destroyed / deleted, unless they are deemed worth preserving for historical interest. These will be reviewed annually around the time of the AGM.

## Appendix 1 - Data Mapping

Data Held	Where held	Why held	How Long Held
<b>Councillors</b> Name Address Tel no Email address	Spreadsheet held by Councillors	To enable council business Legitimate interest	Deleted within one month of resignation
<b>Microgrant applicants</b> Name Address Tel no Email address	In paper file or electronically	To process the application Legitimate interest	Deleted annually after report sent to funding provider (no personal data included)
<b>Contractors</b> Name Address Tel no Email address	In paper file or electronically	To process any contracts Contractual obligation	Deleted after completion of work and report to AGM
<b>Residents who have contacted CCC</b> Name Address Tel no Email address	In paper file or electronically	In order to respond Legitimate interest	Deleted within one year after correspondence closed

## Appendix 2 – Data Breach Log

Date	Details of Breach	Raised By	Investigation details	Report to ICO and individual?	Suggestions for improvement