



Draft Data Protection Policy

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|----------------------|--------------|--------------------|--------------------|
| Dataprotectionv3 | Draft | 23 May 2023 | 28 May 2024 |

Bletchley and Fenny Stratford Town Council is committed to processing personal information in accordance with the Data Protection Act 2018, General Data Protection Regulations 2018 & Data Protection, Privacy and Electronic Communications Regulations 2020.

We will ensure that our staff and those acting on our behalf obtain, use and disclose personal information lawfully and correctly. In particular we will ensure that personal information is:

- processed fairly and lawfully
- processed only for specified and lawful purposes
- adequate, relevant and not excessive
- accurate and up to date.
- not kept longer than is necessary
- processed in accordance with the rights of the owners of the information
- kept secure.
- transferred outside the European Economic Area only with the town council's consent and if there is adequate protection.

To further explain why we may hold and how we use your personal data, please refer to our general [Privacy Notice](#) published on our website **www.bletchleyfennystratford-tc.gov.uk**

Responsibility for Data Management

The Data Controller

Under the current legislation the Data Controller is Bletchley and Fenny Stratford Town Council. This means the town council will be responsible for ensuring that data is collected where deemed necessary, stored efficiently and securely and for how long. As data controller the town council ultimately determines for what purposes personal information is held and what it will be used for. It is also responsible for notifying the Information Commissioner of the data it holds or is likely to hold, and the general purposes that this data will be used for. The Town Clerk will carry out the active duties of the town council for data control and staff will handle various aspects of data management and data processing.

Data Protection Officer

Under the current legislation the Town Council is not required to appoint a Data Protection Officer and has not done so.

The Support Services Manager has been designated as the officer responsible for data queries, investigations around misuse of data, and will act with the Data Controller in ensuring the council is compliant with the requirements of the Data Protection Act 2018.

Staff of the Council

Staff of the council will be responsible for data processing and data management, and will act under the guidance of their line managers.

Members/Councillors

Data held by councillors on personal electronic devices or paper records in their home, unless generated by the town council, is not considered data held by the town council. Such data is to be managed individually by councillors who may wish to register with the ICO as data controllers.

Data held by councillors on their council provided tablets and within their council provided email accounts is considered data held by the town council. When using these devices and accounts councillors should delete all emails/records containing personal data when no longer required and should not forward any personal data outside the council except with the consent, The Support Services Manager should be notified within 24 hours of any suspected data breach.