



TIDWORTH TOWN COUNCIL

GDPR

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Revision 1				
Revision 2				
Revision 3				

**Next review date September
2028**

Tidworth Town Council

GDPR Policy Pack

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1. Data Protection Policy

1. Policy statement

Tidworth Town Council is committed to handling personal data lawfully, fairly and transparently in accordance with UK GDPR and the Data Protection Act 2018.

2. Scope

This policy applies to councillors, staff, volunteers, contractors and anyone processing personal data on behalf of the council.

3. Key principles

- Process data only for specific, lawful purposes.
- Collect only what is necessary.
- Keep data accurate and up to date.
- Keep data no longer than necessary.
- Keep data secure.
- Be able to demonstrate compliance.

4. Responsibilities

- Council: approves policies and monitors compliance.
- Clerk / RFO: day-to-day oversight and incident escalation.
- All users: handle personal data carefully and report concerns promptly.

5. Review

This policy will be reviewed at least annually and after any significant incident or system change.

2. Tidworth Town Council Privacy Notice

2.1. Who we are

Tidworth Town Council is the data controller for the personal information we collect and use. This means we decide how and why your personal data is processed.

2.2. What this notice covers

This privacy notice explains:

The personal data we may collect

We may collect and process the following types of personal data:

- name
- address
- email address
- telephone number
- correspondence and enquiry details
- meeting attendance records
- consultation responses
- payment and invoicing details
- employment or volunteer information
- CCTV images where applicable
- photographs taken at council events
- information relating to complaints, requests, or reports to the Council

We may also process special category data where necessary, for example where safeguarding, equality, or accessibility issues arise.

2.3. Why we collect your data

We use personal data to:

- provide council services
- respond to enquiries and correspondence
- manage meetings and committee business
- process payments and invoices

- administer grants, bookings, or applications
- manage employment, recruitment, and volunteering
- maintain records required by law
- meet our public duties and legal obligations
- promote council activities and community engagement
- keep people safe, including safeguarding purposes

2.4. Our lawful basis for processing

We process personal data under one or more of the following lawful bases:

- consent
- contract
- legal obligation
- vital interests
- public task
- legitimate interests
- Where special category data is processed, any additional lawful condition will also apply.

2.5. How we collect your data

We may collect data when you:

- contact us by phone, email, letter, or online form
- attend a meeting or event
- apply for a service, job, grant, or booking
- subscribe to updates
- use Council facilities or services
- interact with us on social media or through our website
- submit a complaint, request, or report

2.6. Sharing your data

We may share your information where necessary with:

- council staff, councillors, and authorised volunteers
- contractors and service providers

- external auditors
- local authorities and government bodies
- law enforcement or safeguarding agencies
- payroll, IT, or legal service providers

We will only share information where it is lawful and necessary to do so.

2.7. How we keep your data safe

We take appropriate technical and organisational measures to protect personal data from loss, misuse, unauthorised access, or disclosure.

2.8. How long we keep your data

We keep personal data only for as long as necessary to fulfil the purpose for which it was collected, including any legal, accounting, or record-keeping requirements.

Retention periods are set out in our retention schedule where applicable.

2.9. Your rights

Under data protection law, you may have the right to:

- access your personal data
- request correction of inaccurate data
- request deletion in certain circumstances
- object to processing in certain circumstances
- request restriction of processing
- request data portability in certain cases
- withdraw consent where consent is the lawful basis

2.10. CCTV, photographs, and recordings

Where the Council uses CCTV, photographs, or audio/video recordings, we will do so lawfully and with appropriate notices where required.

If you attend a public event, you may be photographed or filmed for legitimate council purposes such as publicity, record keeping, or promotion.

2.11. Cookies and website analytics

If our website uses cookies or analytics tools, we will explain this separately in our cookies notice or website banner.

2.12. Children and vulnerable people

We may process personal data about children, young people, or vulnerable adults where necessary to deliver services, respond to safeguarding concerns, or protect welfare.

2.13. Complaints

If you are unhappy with how we have handled your personal data, please contact us first so we can try to resolve the issue.

You also have the right to complain to the Information Commissioner's Office (ICO).

2.14. Contact details

Data Protection Contact: Town Clerk

Tidworth Town Council

Civic Centre, Wyllye Road, Tidworth SP9 7QQ

townclerk@tidworthtowncouncil.gov.uk

01980 847390

2.15. Changes to this notice

We may update this privacy notice from time to time. The latest version will be published on the Council website www.tidworthtowncouncil.gov.uk.

3. Records, Retention and Disposal

The Council will keep records only for as long as necessary for legal, operational and audit reasons.

- Maintain a retention schedule for each record type.
- Store paper and digital records securely.
- Delete or destroy records securely when retention ends.
- Keep a record of any disposal decisions.

4. Subject Access Request (SAR) Procedure

Upon receipt of a SAR request the Council will:

- Log the request immediately.
- Verify the requester's identity where needed.
- Search relevant systems, email accounts and paper files.
- Redact third-party personal data where appropriate.
- Respond within the statutory timeframe.
- Record the outcome in the SAR log.

5. Data Breach Procedure

If a Data Breach occurs the Council will:

- Identify and contain the incident.
- Report it to the Clerk / RFO immediately.
- Assess likely risk to individuals.
- Decide whether ICO notification is required.
- Keep a breach log, including actions taken and lessons learned.

6. Information Security

To ensure information is stored securely the Council will:

- Use strong passwords and multi-factor authentication where available.
- Restrict access to those who need it.
- Lock screens and secure paper files.
- Use approved devices and software.
- Back up data regularly.
- Report suspicious emails, lost devices and unauthorised access immediately.

7. Data Sharing

Personal data may only be shared where there is a lawful basis and a clear purpose.

The council will:

- Share the minimum necessary information.

- Use written data sharing agreements where appropriate.
- Check recipients' security arrangements.
- Keep a log of significant sharing arrangements.

8. CCTV

Closed Circuit Television (CCTV) at Tidworth Civic Centre, Wyllye Road, Tidworth SP9 7QQ is regulated in accordance with the Data Protection Act 2018.

Purpose

The CCTV system is operated for the safety and security of the people who use the Civic Centre, our staff, the building and surrounding area, information located or stored on the premises, and assets (e.g. the War Memorial).

The CCTV system may be used to investigate security incidents in order to secure evidence, should such incidents occur.

Locations

Rear Hall Entrance
Rear Hall
Rear Ordnance Road
Front Ordnance Road
Civic Entrance
Front Civic
Car Park
Hall
Hall Corridor
Office Corridor
Reception
Perham A
Perham B
Cafe seating area
Cafe (near the Till)
Meeting room corridor
Kitchen

Appendix A

Signage

There will be clear signs in place in and around the area with Tidworth Town Council contact details on.

Retention

Unless required for evidential purposes, the retention period of any images recorded by our CCTV footage is 31 days and any footage that is over this period will be destroyed.

Access

It is important that access to, and disclosure of images to third parties, is strictly controlled and documented. This is to ensure that the rights of the individual are maintained, and that the chain of evidence remains intact should the images be required for evidential purposes. Access to these images will normally be provided in response to the following; a Freedom of Information access request, or a Data Protection access request.

Only in exceptional circumstances may images be disclosed to those carrying out a formal internal investigation or disciplinary procedure, where it can reasonably be expected that the disclosure of the images may help the investigation or prosecution of a sufficiently serious disciplinary offence or a criminal offence.

In all cases the images will be viewed by two people, one of whom must be a member of staff.

Should any images be required by the Police, the protocol is:

- The request must be in written form, specifying the date and time (as far as possible) of the image - can be email.
- The Council must provide a response to a request within 5 days.
- If the decision is taken not to release the images, then the image in question must be held and not destroyed until all legal avenues have been exhausted.

Disclosures

Under Data Protection legislation, an individual has the right to view any personal information held about them by a Data Controller

All requests should be made in writing to the Town Clerk, Tidworth Town Council, Tidworth Civic Centre, Wylle Road, Tidworth SP9 7QQ

The following information should be logged when access is provided:

- Record the reason for disclosure.
- Record the details of the image disclosed i.e. the date, time and location of the image.
- Record who was present when the images were disclosed.
- Record whether any images were disguised/blurred to prevent identification of individuals other than the data subject.

If such a request is received the images are to be viewed on site.

Staff and Leadership Committee members are authorised to access images for these requests.

9. Training and Awareness Log

A training and awareness log will be kept by the Town Clerk and retained in the office, this will include the following information:

Name

Role

Training date

Topic Covered

Refresher due date

Appendix A

