

Holybrook Parish Council

Proudly serving the residents of Holybrook Parish since 2000

The Parish Office
Beansheaf Community Centre
Charrington Road
Calcot
Reading RG31 7AW

Tel: 0118 9454339 e-mail: clerk@holybrook-pc.gov.uk www.holybrook-pc.gov.uk

Privacy Notice

Holybrook Parish Council is registered as a data controller (ICO registration: Z6097573) as we collect and process personal information about you. This applies to council staff and Councillors, members of the public and hirers of our facilities.

We process and hold your information in order to provide public services. This notice explains how we use and share your information. Information may be collected by paper or online form, by telephone, e-mail, CCTV or by a member of our staff, or one of our partners (a list of third-party processors and categories of recipients emails available on request).

We rely on the following lawful bases under the UK GDPR to process your personal data:

- Article 6(1)(e) performance of a task carried out in the public interest or in the exercise of official authority
- Article 6(1)(c) compliance with a legal obligation
- Article 6(1)(a) consent (where explicitly sought)
- If we process special category data, we will do so under Article 9(2)(g) substantial public interest, and in accordance with the Data Protection Act 2018 Schedule 1.

Why do we collect information about you?

We need to collect and hold information about you, in order to:

- deliver public services;
- confirm your identity to provide some services;
- contact you by post, e-mail or telephone;
- understand your needs to provide the services that you request;
- understand what we can do for you and maybe inform you of other relevant services and benefits;
- update your customer records;
- help us to build up a picture of how we are performing at delivering services to you and what services the people of Holybrook need;
- process financial transactions;
- prevent and detect fraud and corruption in the use of public funds;

- obtain your opinion about our services;
- allow us to undertake and meet our statutory functions efficiently and effectively;

How we use your information

We will use the information you provide in a manner that conforms to the General Data Protection Regulation. We will endeavour to keep your information accurate and up-to-date and not keep it for longer than is necessary (please see our Retention Policy for more information). In some instances the law sets the length of time information has to be kept.

We may process your information for the following purposes:

- for the service you requested, and to monitor and improve the council's performance in responding to your request;
- to allow us to be able to communicate and provide services and benefits appropriate to your needs;
- to ensure that we meet our legal obligations;
- where necessary for the law enforcement functions;
- to prevent and detect fraud or crime;
- to process financial transactions including grants and payments;
- to collect monies owed to us;
- where necessary to protect individuals from harm or injury;
- to allow the statistical analysis of data so we can plan the provision of services.

We will not pass any personal data on to third parties, other than those who either process information on our behalf, or because of a legal requirement, and we will only do so, where possible, after we have ensured that sufficient steps have been taken to protect the personal data by the recipient.

We will not disclose any information that you provide in confidence to us, to anyone else without your permission, except in the few situations where disclosure is required by law, or where we have good reason to believe that failing to share the information would put someone at risk. You will be told about this.

Information sharing

We may need to pass your information to other people and organisations that provide the service. These providers are obliged to keep your details securely, and use them only to fulfil your request. If we wish to pass your sensitive or confidential information onto a third party, we will only do so once we have obtained your consent, unless we are legally required to do so.

We may disclose information to other partners where it is necessary, either to comply with a legal obligation, or where permitted under the General Data Protection Regulation, e.g. where the disclosure is necessary for the purposes of the prevention and/or detection of crime.

Where we need to disclose sensitive or confidential information to other partners, we will do so only with your prior explicit consent or where we are legally required to.

We may disclose information when necessary to prevent risk of harm to an individual. At no time will your information be passed to organisations external to us and our partners, for marketing or sales purposes or for any commercial use without your prior express consent.

Detect and prevent fraud or crime

Holybrook Parish Council is required by law to protect the public funds it administers. We may use any of the information you provide to us for the prevention and detection of fraud. We may also share this information with other bodies responsible for auditing, administering public funds, or where undertaking a public function, in order to prevent and detect fraud.

Section 68 of the Serious Crime Act 2007 enables public authorities to disclose information for the purposes of preventing fraud, as a member of a specified anti-fraud organisation or otherwise in accordance with any arrangements made with such an organisation.

In limited situations we may monitor and record electronic transactions (website, e-mail and telephone conversations). This will only be used to prevent or detect a crime, or investigate or detect the unauthorised use of the telecommunications system and only as permitted by the Telecommunications (Lawful Business Practice) (Interception of Communications) Regulations 2000.

Emergency response management

Data matching may also be used to assist the Council in responding to emergencies or major accidents, by allowing the Council, in conjunction with the emergency services, to identify individuals who may need additional support in the event of e.g. an emergency evacuation.

Telephone calls

We will inform you if we record or monitor any telephone calls you make to us. Calls made direct to, or from, our Parish Office (0118 9454 339) may be recorded and kept for 12 months from the date of the call. These records will be used, to increase your security, for our record keeping of the transaction and for our staff training purposes. No recording will take place without prior warning.

E-mails

If you e-mail the Parish Council, either via the Parish Office, or directly with a Parish Councillor, we may keep a record of your contact and your e-mail address and the e-mail for our record keeping of the transaction. For security reasons we will not include any confidential information about you in any e-mail we send to you, unless you consent to this. We suggest that you keep the amount of confidential information you send to us via e-mail to a minimum.

CCTV/Surveillance

We have installed a CCTV system at the Beansheaf Centre monitoring inside and outside areas which are used by members of the public, for the purposes of public and staff safety, and crime prevention and detection. Signs are displayed notifying you that CCTV is in operation and providing details of who to contact for further information about the scheme.

Images captured by CCTV will not be kept for longer than is necessary. However, on occasions, there may be a need to keep images for longer, for example where a crime is being investigated. You have the right to see CCTV images of yourself and be provided with a copy of the images.

How we protect your information

Our aim is not to be intrusive and we will not ask irrelevant or unnecessary questions. The information you provide will be subject to Data Protection Policies and procedures to make sure it cannot be seen, accessed or disclosed to anyone who should not see it.

The Parish Council provides training to staff that handle personal information and treat it as a disciplinary matter if they misuse or do not look after your personal information properly. We will not keep your information longer than it is needed or where the law states how long this should be kept. We will dispose of paper records or delete any electronic personal information in a secure way.

Your rights

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

- Access your data
- Rectify inaccurate or incomplete data
- Request erasure of your data (where applicable)
- Restrict or object to certain processing
- Data portability (for data provided by you under consent or contract)
- Lodge a complaint with the Information Commissioner's Office (www.ico.org.uk)

Therefore, you have the right to request that Holybrook Parish Council stops processing your personal data in relation to any council service.

Where possible, we will seek to comply with your request but we may be required to hold or process information to comply with a legal requirement.

We try to ensure that any information we hold about you is correct. There may be situations where you find the information we hold is no longer accurate and you have the right to have this corrected. Please contact the Parish Council to do so. You are legally entitled to request access to any information about you that we hold, and a copy. We do not charge for this service unless your request is manifestly unfounded, excessive or repetitive.

Changes to this privacy notice

This notice is reviewed annually or whenever there is a significant change in legislation or council procedures.

Original Copy	Date of review approval	Version number	Date of next review
March 2018	12 th May 2025	V3	May 2026