

Privacy Notice

Corporate

Reasons/Purposes for processing information

Data protection

In order to meet our responsibilities as a local authority, we collect, hold and process considerable amounts of personal data. The personal data you supply to us is processed in accordance with the General Data Protection Regulations (GDPR) and the Data Protection Act 2018 (DPA).

We understand the importance of ensuring that personal data is always treated lawfully and appropriately and that the rights of individuals are upheld.

This corporate privacy statement summarises our approach to ensuring personal data is collected and processed fairly, lawfully, securely and with respect for individuals' rights.

What we mean by personal data

Personal data is information that relates to a natural living individual who can be either:

- identified from that data or
- can be identified from the information combined with any other information that is in the possession of the person or organisation holding the information

Basic personal data includes name, address, date of birth, telephone numbers, and bank account details.

Special category personal data (sensitive personal data) includes racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic or biometric data, physical or mental health conditions, sex life or sexual orientation.

Our Data Processing Registration

All organisations that collect and then use (process) the personal data defined above must register with the Information Commissioner's Office (ICO). We have had a continuous registration since the first Data Protection Act in 1984.

Borough Council of Wellingborough's current registration number is Z5378185. [See our full registration.](#) Here you can see the reasons why we collect data, the types of personal data we collect and from whom, and the partners and other organisations with whom we share the data.



Collecting data

We are required to collect, use and hold personal data about individuals. Data is required for the purposes of carrying out our statutory obligations, delivering services and meeting the needs of individuals that we deal with. This includes current, past and prospective employees, service users, members of the public, members of the council, our business partners and other local authorities or public bodies.

We may collect personal information from you, in all of the following ways:

- paper, electronic or online forms
- CCTV
- body worn cameras
- use of audio monitoring equipment
- email
- telephone
- website, or
- face to face, with one of our employees, or one of our partners

How will we use the information we hold about you?

We will only use your personal information when we have a legitimate basis for doing so and will process it in a fair and lawful way, including in the following circumstances:

- To allow us to communicate with you and provide services that are appropriate for your needs
- To plan, monitor and improve the performance of those services
- Where we exercise our enforcement functions; for example, licensing, planning, private sector landlords and health and safety.
- When undertaking legal proceedings, including prosecutions by us
- To process financial transactions such as payments and benefits, including where we are acting on behalf of other government bodies, e.g. the Department for Work and Pensions
- To prevent and detect fraud and other crimes including but not limited to CCTV surveillance, whistleblowing and data matching
- In order to protect individuals from harm or injury
- To ensure that we fulfil our duties under the general law including those imposed under the Equalities Act 2010, the Health and Safety Acts, the Local Government Act 2000 and Public Sector Internal Audit Standards

Who we share your information with

To ensure that we provide you with an efficient and effective service we will sometimes need to share your information between services of the Borough Council of Wellingborough, as well as with our partner organisations.

We may disclose your information to others, but only where this is necessary, either to comply with our legal obligations or, as permitted by the GDPR, other data protection legislation or statutory guidance. This



includes for the purpose of the prevention and/or detection of crime, or where it is necessary to allow a third party working for or acting on our behalf, to provide a service.

This authority is required by law to protect the public funds it administers. We may share information provided to us with other bodies responsible for auditing or administering public funds, in order to prevent and detect fraud, such as national data matching exercises like the National Fraud Initiative (NFI).

We will never share your information for marketing purposes or sell your information to a third party.

What is the lawful basis for us to process your information?

There may be one or more lawful basis for processing the data of a data subject.

- The data subject has given consent to the processing of his or her personal data for one or more specific purpose.
- Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract
- Processing is necessary for compliance with a legal obligation to which we as the data controller are subject.
- Processing is necessary in order to protect the vital interests of the data subject or of another natural person
- Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
- Processing is necessary for the purpose of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.

Security of Processing

As the controller the Borough Council of Wellingborough has implemented technical and organisational measures to ensure that all personal information processed and stored remains secure and backed up.

Our employees and members will have access to personal data only where it is required in order to fulfil their role.

In the main personal data will be held on secure computer networks with appropriate layers of security. Access is controlled by authorised username and passwords and where appropriate 3rd level authentication into separate systems.

In the rare event that a data breach occurs we have practices and procedure in place to minimise any disruption to services and data subjects including recording and reporting to the governing body (Information Commissioner Office).

Where there is a suspected breach of security, data loss or cyber-attack our Data Protection Officer (DPO) will investigate and manage any follow up actions necessary to report the incident and coordinate our response.



- Council employees and members must report any suspected data breaches to the DPO.
- Council employees and members must use appropriate levels of security to store or share personal data. Passwords must not be shared and any personal data not held on our computer network must be encrypted.
- When new projects involving personal data are being developed, Data Privacy Impact Assessments (DPIAs) will be carried out by the project manager and reviewed by the DPO in order to assess and mitigate any privacy risks.

How long do we keep your information?

The Borough Council of Wellingborough will keep your information for as long as it is required by us or other regulatory bodies in order to comply with legal and regulatory requirements or for any other operational reasons. In most cases this will be a minimum of 6 years.

What are your Rights?

Under data protection legislation, a data subject (You) have the right to request access to information held by the Borough Council of Wellingborough about you. To make a request for your personal information you can contact the Data Protection Officer at the Borough Council of Wellingborough using the details under Further Information. There is Subject Access Request Guidance held on the Borough Council of Wellingborough's website which may aid you in your request.

You have the right to:

- To ask for access to information about you that we hold
- To have your personal data rectified, if it is inaccurate or incomplete
- To request the deletion or removal of personal data where there is no compelling reason for its continued processing
- To restrict our processing of your data
- To object to direct marketing (including profiling) and processing for the purposes of scientific/historical research and statistics
- Not to be subject to decisions based purely on automated processing where it produces a legal or similarly significant effect on you.

Withdrawal of consent and the right to lodge a complaint

Where the Borough Council of Wellingborough is processing your data with your CONSENT as the lawful basis, you have the right to withdraw that consent at any time. Consent must be given by an obvious action and not assumed or be part of any terms and conditions. If you change your mind or you are unhappy with our use of your personal data. Please contact us on the details below.



Further information

The Borough Council of Wellingborough is the data controller and processor of all personal data.

Karen Denton is the designated Data Protection Officer (DPO). If you have any questions or concerns as to how your data is processed or you wish to make a complaint you can contact the DPO in one of the following ways:

 Email: info@wellingborough.gov.uk

 Telephone: 01933 229777

Or you can write to: The Data Protection Officer



Borough Council of Wellingborough
Swanspool House
Doddington Road
Wellingborough
NN8 1BP

If you are not satisfied with our response or believe BCW are not processing your personal data in accordance with the law you have the right to apply directly to the Information Commissioner for a decision.

The Information Commissioner can be contacted at:

Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

OR

www.ico.org.uk

