



# WHITE COLNE PARISH COUNCIL

White Colne Village Hall, Bures Road, White Colne, CO6 2QA.

[www.whitecolneparishcouncil.gov.uk](http://www.whitecolneparishcouncil.gov.uk)

[clerk@whitecolneparishcouncil.gov.uk](mailto:clerk@whitecolneparishcouncil.gov.uk)

## Privacy Policy

### 1. PRIVACY POLICY

- 1.01 White Colne Parish Council collects, holds and processes a considerable amount of information, including personal information, which allows it to provide services effectively. White Colne Parish Council does this in its capacity as a data controller. Contact details for the data controller can be found in the 'Where can I get advice section?' below.
- 1.02 The Council recognises that this information is important to citizens and that it is responsible to citizens for the information it holds about them. As such, it takes seriously its responsibilities under Data Protection legislation to ensure that any personal information it collects and uses is done so proportionately, correctly, and safely. The privacy notice below explains how the Council uses information about you and the ways in which we protect your privacy.
- 1.03 Personal data means any information relating to an identifiable person who can be directly or indirectly identified, in particular by reference to an identifier.  
This definition provides for a wide range of personal identifiers to constitute personal data, including name, identification numbers, or location data or online identifiers, which reflect changes in technology and the way organisations collect information about people.
- 1.04 The Council collects, holds and uses personal data to allow it to provide services on behalf of the citizens of White Colne. These services include, amongst others, planning, Allotments, and Village Hall hire.
- 1.05 White Colne Parish Council will use your personal data for a limited number of purposes, and at all times within the rules set out in Data Protection legislation. We will process personal data for the following purposes:
  - For the purpose for which you provided the information. e.g., processing information given for an Allotment Agreement, and to monitor the Council's performance in responding to your request.
  - To allow the Council to be able to communicate and provide services appropriate to your needs.
  - To ensure that the council meets its legal requirements, including obligations imposed under the Race Relations Act and Health and Safety Acts.
  - Where the processing is necessary to comply with its legal obligations, e.g., the prevention and/or detection of crime.
  - To process financial transactions including grants.
  - Where you have consented to the processing.
  - Where necessary to protect individuals from harm or injury.
  - White Colne Parish Council will use your personal data, after it has been anonymised, to allow the statistical analysis of data, and to allow the Council to effectively target and plan the provision of services.

- To deliver services and support to you, to manage those services, to monitor the quality of services provided and to plan new and updated services.
- To train staff.
- Where we need to investigate any worries or complaints you have about your services.

1.06 How the law allows us to use your personal information. There are a number of legal reasons why we need to collect and use your personal information. Each privacy notice at the bottom of this page explains for each service which legal reason is being used.

Generally, we collect and use personal information where:

- you, or your legal representative, have given consent
- you have entered into a contract with us
- it is necessary to perform our statutory duties
- it is necessary to protect someone in an emergency
- it is required by law
- it is necessary for employment purposes
- you have made your information publicly available
- it is necessary for legal cases
- it is to the benefit of society as a whole
- it is necessary to protect public health
- it is necessary for archiving, research, or statistical purposes

If we have consent to use your personal information, you have the right to remove it at any time. If you want to remove your consent, please contact the Clerk to the Council via [clerk@whitecolneparishcouncil.gov.uk](mailto:clerk@whitecolneparishcouncil.gov.uk) and tell us which service you're using so we can deal with your request.

1.07 White Colne Parish Council is continually working to improve how it provides services to the citizens of White Colne. The Council holds a customer record, comprising of your name and address. For some services we might also ask for email address and telephone number. The customer record will allow the council to respond to any queries you may have in respect of the provision of services more quickly and efficiently.

1.08 Telephone calls are not recorded.

1.09 The law gives you a number of rights to control what personal information is used by us and how it is used by us.

1.10 You are also legally entitled to request access to any records held by White Colne Parish Council about yourself. When we receive a request from you in writing, we must normally give you access to everything we have recorded about you. However, we will not let you see any parts of your record which contain:

- confidential information about other people; or
- if we think that a crime may be prevented or found out by disclosing information to you.

This applies to paper and electronic records.

1.11 Whilst White Colne Parish Council tries to ensure that any personal data it holds about you is correct, there may be situations where the information it holds is no longer accurate. If this is the case, please contact us so that any errors can be investigated and corrected.

1.12 You can ask for your personal information to be deleted (the right to be forgotten), for example:

- Where your personal information is no longer needed for the reason why it was collected in the first place

- Where you have removed your consent for us to use your information (where there is no other legal reason for us to use it)
- Where there is no legal reason for the use of your information
- Where deleting the information is a legal requirement

Please note that we cannot delete your information where:

- We are required to have it by law
- it is used for freedom of expression
- it is necessary for legal claim

- 1.13 You have the right to complain about any matter relating to our service, including how we use your personal data. In the first instance please contact the Clerk to the Council.
- 1.14 We will take appropriate steps to make sure we hold records about you (on paper and electronically) in a secure way, and we will only make them available to those who have a right to see them. Our security includes:
- encryption
  - access controls on systems
  - security training for all staff
- 1.15 We will only store your personal information for as long as is necessary. Records will be kept in accordance with the retention policy written by the National Association of Local Councils.
- 1.16 If you would like further information or if you have any concerns about how the Council is handling your personal data, please contact us in writing.  
For independent advice about data protection, privacy and data sharing issues, you can contact the Information Commissioner's Office (ICO) at: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF. Tel: 0303 123 1113 (local rate) or 01625 545 745 if you prefer to use a national rate number. Alternatively, visit [www.ico.org.uk](http://www.ico.org.uk) or email [casework@ico.org.uk](mailto:casework@ico.org.uk).
- 1.17 We use Google Analytics to collect information about how people use the website. We do this to make sure it's meeting its users' needs and to understand how we could do it better. Google Analytics stores information about what pages you visit, how long you are on the site, how you got here and what you click on. We do not collect or store your personal information (e.g., your name or address) so this information cannot be used to identify who you are.  
We also collect information on the number of times particular search terms are used and the number of failed searches. We use this information to improve access to the site and to identify gaps in the information content so we can plan appropriate expansion of the system. Unless the law allows us to, we do not:
- share any of the information we collect about you with others
  - use this information to identify individuals.
- 1.18 White Colne Parish Council will continually review and update this privacy notice to reflect changes in our services as well as to comply with changes in the law. When such changes occur, we will revise the "last updated" date at the bottom of this notice. We encourage you to periodically visit the Council's web site to review this notice and to be informed of how White Colne Parish Council is protecting your information.
- 1.19 CUSTOMER SERVICE, ALLOTMENTS, VILLAGE HALL**
- 1.20 White Colne Parish Council may collect, hold, and process personal data in order to assess and improve its customer service. This may include:
- Customer name
  - Contact details (address, telephone number, email address)

- Details of your enquiry
- Bank details

- 1.21 The Council has a requirement to process the above information for the investigation of Complaints, Compliments and/or Comments. We operate under the Data Protection Act 2018 and other regulations such as GDPR. We request the minimum amount of information, and it is stored securely in a protected server.
- 1.22 We may keep your personal information up to 6 years after the record has been closed.

## **2. DATA BREACH POLICY**

- 2.01 The General Data Protection Regulations 2018 define a personal data breach as “a breach of security leading to accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed”.
- 2.02 Examples include:
- Access by an unauthorised third party.
  - Deliberate or accidental action (or inaction) by a controller or processor.
  - Sending personal data to an incorrect recipient.
  - Computing devices containing personal data being lost or stolen.
  - Alteration of personal data without permission.
  - Loss of availability of personal data.
- 2.03 A breach of personal data may result in a loss of control of personal data, discrimination, identity theft or fraud, financial loss, damage to reputation, loss of confidentiality of personal data, damage to property or social disadvantage. Therefore, a breach, depending on the circumstances of the breach, can have a range of effects on individuals.
- 2.04 Data breaches do not have to be routinely notified to the Information Commissioner’s Office (ICO) or others. GDPR makes informing the ICO and the individuals affected compulsory in certain circumstances.
- 2.05 If the data breach is likely to result in a high risk to the rights and freedoms of the individual (e.g., identity theft), the breach must be reported to the individual and to the ICO without undue delay and, where feasible, not later than 72 hours after having become aware of the breach.
- 2.06 The Proper Officer must be informed immediately. The Proper Officer must report the breach to the ICO. If the ICO is not informed within 72 hours, Proper Officer must give reasons for the delay when they report the breach.
- 2.07 WHEN NOTIFYING THE ICO OF A BREACH, THE COUNCIL MUST:
- Describe the nature of the breach including the cause and scope (type of data, approximate number of data subjects and data records concerned);
  - Communicate the name and contact details of the Proper Officer.
  - Describe the likely consequences of the breach.
  - Describe the measures taken or proposed to be taken to address the personal data breach including mitigation measures and future preventative actions.
- 2.08 WHEN NOTIFYING AN INDIVIDUAL OF A BREACH, THE COUNCIL MUST:
- Communicate the name and contact details of the Proper Officer.
  - Describe the likely consequences of the breach.
  - Describe the measures taken or proposed to be taken to address the personal data breach including mitigation measures and future preventative actions.

The Council will not need to notify an individual if the following applies:

- It has previously implemented appropriate technical and organisational measures such that the personal data is unintelligible to any person not authorised to access it (e.g., encryption);
- It has taken subsequent measures to ensure that the high risk to rights and freedoms of individuals is no longer likely to materialise, or;
- It would involve a disproportionate effort.

2.09 If a data processor (e.g., payroll provider) becomes aware of a personal data breach, it must notify the Council without undue delay, so that the Council can fulfil its responsibilities under this policy.

2.10 All data breaches must be recorded. This record should be used to identify system failures and to improve the security of personal data.

- Date of breach
- Type of breach
- No. individuals affected
- No. records affected
- Reporting date to ICO/individual
- Cause of breach
- Likely consequences Preventative actions taken

2.11 Data breaches should be reported to the ICO via:  
<https://ico.org.uk/for-organisations/report-a-breach/>

**This Policy replaces existing WCPC Privacy Policies**

**Adopted: 15.07.2025**

**Next review: 21.07.2026**