

# Frome Town Council Constitution

## Chapter 18a General Data Protection Regulation Privacy Information

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A copy of this document is also available in different formats such as large print, audio or in a different language, please contact the office if this is required.

## Data Protection – How We Use Your Information

Your information will be processed (obtained, used, disclosed and stored) securely and used to contact you, to respond to your correspondence and provide information and/or access to our facilities and services. Information about what we do as a Council is available on our website [here](#).

1. We hold your information on the following lawful bases:
  - a. To provide services, in the public interest, for the people of Frome under the legal powers that we have as a Town Council (to carry out our public task and the exercise of official authority where this is required). These include:
    - Management of the Town Council’s work. For example, organising Council meetings, publication of minutes and annual accounts, Cllrs’ contact information and recording Council meetings for public viewing on the internet.
    - Providing Customer Services. For example, responding to general enquiries and complaints, making room bookings, and National Express bookings and payments.
    - Health and Wellbeing. For example, contacting individuals, using forums and organising meetings.
    - Planning and Economic Development. For example, management of the self-build register, business registers and planning application lists.
    - Community Projects. For example, working with external organisations, volunteers, commissioning a volunteer database, dealing with grant applications, the People’s Budget, and work experience for under 18s.
    - Resilience. For example, sharing information obtained around projects, engaging with people around sustainability, Plastic-Free Frome, and Do Good Business Visits.
    - Economic Development and Regeneration. For example, contacting local businesses and other organisations, providing advice, promoting and organising activities and events to improve regeneration and economic growth in Frome.
    - Environmental Management. For example, managing and improving the town, parks and green spaces, and communicating information to those who are interested in it.
  - b. We may process your information if we are under a legal obligation to do so. For example, under common law (such as our duty of care to protect others), or other statute, legal requirement or regulation (such as Health and Safety law).
  - c. In the legitimate interest(s) of the Council for:
    - Employment of people and volunteers, for example staff administration, recruitment, appraisals and payroll administration.
    - Financial management involving conducting audits, (internal and external), fraud prevention and quarterly reporting.
    - Effective management of our computers, information systems and security.
    - Management of the Town Hall building for example we hold information about our contractors, emergency contacts, use of closed circuit television.

- d. With your consent. For example, to send you information about events. We will let you know how your name or email address can be removed from our contact lists at any time.
  - e. For the performance of a contract or with a view to you entering into a contract with us, for example as an employee of the Council or if you attend an event organised by us.
  - f. We may hold special category information under the following additional lawful bases and conditions:
    - Our employees for staff administration. Information relating to health and racial or ethnic origin, religious beliefs etc. is held and used in accordance with employment law, other law such as equality legislation and in some circumstances with their explicit consent.
    - Information relating to criminal convictions and offences may be held for vetting employees as part of the recruitment process, and for volunteers using the Disclosure Barring Service. It is held in the legitimate interests of the Council, under our legal duty of care, and with the explicit consent of individuals.
    - The maximum period we will hold information is six (6) months and all DBS Certificate information is destroyed after this period. Copies of the Certificate will not be kept, however we may keep a record of the date of issue of a Certificate, the name of the subject, the type of Certificate requested, the position for which the Certificate was requested, the unique reference number of the Certificate and the details of the recruitment decision taken.
    - If, in very exceptional circumstances, it is considered necessary to keep certificate information for longer than six months, we will consult the DBS about this and will give full consideration to the General Data Protection Regulation (GDPR), Data Protection and Human Rights of the individual before doing so. Throughout this time, the usual conditions regarding the safe storage and strictly controlled access will prevail.
2. We may disclose information about you (depending on the circumstances) to:
- a. The public when responding to their enquiries, publishing our financial accounts, minutes of Council meetings and recordings of Council meetings on the internet using YouTube.
  - b. Members of the public for example contact information for businesses and accommodation providers;
  - c. The police and other prosecution organisations to prevent or detect crime, for the apprehension or prosecution of offenders, and taxation.
  - d. Comply with the law or a court order.
  - e. Government organisations such as HM Revenue and Customs for example employee payroll information;
  - f. Other users of Frome Town Hall relating to contractors that we use and to our contractors for building maintenance.
  - g. Other local authorities. Our service providers and data processors where it is necessary for them to process your personal information to carry out work on our behalf. For example:
    - ITEC Connect Limited – the company that maintains our computer services
    - Mailchimp – for email communications

- Survey Monkey - to conduct surveys
- Dropbox - for file storage and document sharing
- Google - for storage of spreadsheets
- Ticket Tailor – for events bookings
- YouTube for the live video streaming of Council meetings
- DP Assist – for Data Protection consultancy advice and training
- Somerset County Council and Somerset Heritage Trust – for the storage of archive records on behalf of the Council
- Community Council of Somerset for the Self-Build Register
- SPARK (South Somerset Association for Voluntary and Community Action) for maintaining the Volunteers Database
- Apex Alarms – for the provision and maintenance of the Council’s CCTV system
- Purple Elephant for provision of Youth Conferences

### 3. Transferring Your Information to Countries Outside the European Economic Area

If we publish information about you on our website or social media, it may be made publicly available worldwide and we will ask for your consent before we do this. If you provide information to us, using social media (such as make a comment about us on Facebook) check their privacy policy, as they are responsible for what happens to your information.

We do not send your information overseas, but we use service providers who may store it in other countries. For example, the following organisations may store information about you in the United States and have all signed up to the United States Privacy Shield Framework to ensure that your information and rights are protected with Data Protection safeguards in place. Information about this is available at <https://www.privacyshield.gov/welcome>.

- a. Mailchimp to send you emails informing you about our activities such as events.
- b. Survey Monkey to conduct surveys.
- c. Dropbox for file storage and document sharing.
- d. Google for storage of spreadsheets.
- e. YouTube for the live streaming of CCTV videos of Council meetings and is available to the public world-wide. The YouTube channel is available at [https://www.youtube.com/channel/UCXUizztGFegzjenOqxe\\_ABg](https://www.youtube.com/channel/UCXUizztGFegzjenOqxe_ABg).

### 4. Retention

We keep your information while we have a relationship with you in order to provide a service to you and will delete or destroy it after five years, unless we need to keep it for historical, or public interest reasons (for example minutes of Council Meetings are kept indefinitely in archives which are publicly available). Our retention policy is available [here](#).

### 5. Your Data Protection Rights

You have the right to:

- a. Be informed about what we do with your personal information.
- b. Have access to it.
- c. Have it rectified or corrected if it is inaccurate.

- d. Have it erased, (but not in all circumstances, as it depends on our reason(s) for holding it).
- e. Have its use restricted or stopped while we respond to you and handle any requests you make about it such as to see a copy of what information we hold about you.
- f. To receive a copy of the information you have provided to us, in a structured, commonly used and machine-readable format (if we are able to do this), so that you can take it elsewhere.
- g. Object to us using your information:
  - For the performance of a task carried out in the public interest.
  - In the exercise of our official authority
  - In our legitimate interests
  - For statistical purposes (unless exceptions apply).
- h. To withdraw your consent, where we are relying only on your agreement to hold or use your information.

If you have any queries, would like to exercise your rights or make a complaint, contact the Town Clerk:

[info@frometowncouncil.gov.uk](mailto:info@frometowncouncil.gov.uk)

01373 465757

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You also have the right to contact the Information Commissioner's Office to make a complaint about what we do with your information on:

0303 123 1113 (local rate)

or

01625 545 745 if you prefer to use a national rate number

Visit their website at <https://ico.org.uk>

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