

## Condover Parish Council : Data protection policies and procedures

### Data Protection Principles

The UK General Data Protection Regulation ('UKGDPR') establishes some key principles that apply to all organisations, whatever their size. They must ensure that all information they keep on individuals is:

- Used fairly and lawfully and in a transparent manner.
- Used for specified, explicit and legitimate purposes.
- Used in a way that is adequate, relevant and limited to what is necessary.
- Accurate and kept up-to-date.
- Kept for no longer than is necessary.
- Kept safe and secure

UKGDPR requires all Data Controllers (of which CPC is one) to be able to demonstrate compliance with these principles.

There is stronger protection for more sensitive information (also known as special categories of data) that may be within staff records, for instance, such as:

- Ethnic background.
- Political opinions.
- Religious beliefs.
- Health.
- Sexual health.

Criminal records are subject to their own specific restrictions on use.

CPC should exercise particular care with regard to donor information to ensure this is kept confidential and in accordance with donors' wishes on confidentiality etc.

In terms of employees, all employees should exercise a duty of care to ensure any information about the organization is kept secure; this is described in more detail in the employee contract.

## Personal data and how Condover Parish Council will handle it

### Personal data introduction

The UK General Data Protection Regulation (UKGDPR) continues post Brexit the Europe-wide law that replaces the Data Protection Act 1998 in the UK. It is part of the wider package of reform to the data protection landscape that includes the Data Protection Act 2018. The UKGDPR sets out requirements for how organisations will need to handle personal data from 25 May 2018.

Under article 4 of UKGDPR personal data means any information relating to an identified or identifiable natural person, known as a “data subject”. An identifiable person is one who can be identified, directly or indirectly, in particular by reference to an identifier, such as a name. Thus, CPC holds personal data on staff, trustees, volunteers and external people. In most cases, CPC does not hold sensitive personal data, but it may do in relation to its staff, for example on physical or mental health, racial or ethnic origin.

CPC needs consent of the data subject to process data. Consent means any freely given, specific, informed and unambiguous indication of the data subject’s wishes, either by a statement or clear affirmative action.

To ensure compliance with the Data Protection Bill and UKGDPR CPC reviewed all the types of personal data it held early in 2018 and has set out in the table below the type of personal data it is holding; where it came from, who CPC will share it with and the procedures and actions CPC takes to control, process, retain and dispose of the data in compliance with the UKGDPR. The procedures and actions adopted are compatible with CPC’s human resources document retention policy (set out below).

CPC has a privacy notice that is included with requests for people to fill in the data protection consent form (see below); and provided to people on request.

### Data protection officer

Condover Parish Council has designated its Parish Clerk as the data protection officer (DPO), though all staff and volunteers are required to abide by the data protection policies and procedures set out in these standing orders. In addition, the lead responsibility for controlling, processing and retaining data has been delegated to the Parish Clerk in some circumstances as set out in the table below.

### Personal data held by CPC, where it came from/who CPC share it with and how CPC will control, process, retain and dispose of the data

| <b>Personal data held by CPC</b>         | <b>Where it came from</b> | <b>Who CPC share it with</b> | <b>Procedures/actions: How CPC will control, process, retain and dispose of data</b>  | <b>Lead CPC</b> |
|--|---------------------------|------------------------------|---|-----------------|
| Contact details of local authority staff | They supplied it.         | No one without the data      | Email all our historical contacts in April 2018 asking them to complete a data protection consent form (see below) by the end of April if they want to remain on our mailing list. Thereafter ask new potential contacts to | PC              |

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|   | <p>We picked it up from information they sent us/or put on their website or in other material.</p> <p>We picked it up from events we attended.</p> <p>We picked it up from emails where we were one of the recipients.</p> | <p>subject's consent, unless required to do so by law.</p>                         | <p>complete a data consent protection form and return it to CPC if they want to be added to our mailing list.</p> <p>Destroy all historical contact information (whether hard or electronic) by 25<sup>th</sup> May where we do not have a completed consent form.</p> <p>From the 25<sup>th</sup> May, only hold contact information where people have completed a consent form.</p> <p>Keep contact information and consent forms only on the cloud in a contacts folder and ensure all documents with contact details are password protected and the passwords only know to staff who need access.</p> <p>Ensure no contact details are kept on laptops.</p> <p>Destroy any hard copies containing contact information via shredding within one working day or it being received or generated.</p>  |           |
| <p>Contact details of Directors/staff of charitable and private organisations working on Condover Parish Council and related issues</p> | <p>They supplied it.</p> <p>We picked it up from information they sent us/or put on their website or in press releases.</p> <p>We picked it up from events we attended.</p>  | <p>No one without the data subject's consent, unless required to do so by law.</p> | <p>Email all our historical contacts in April 2018 asking them to complete a data protection consent form (see below) by the end of April if they want to remain on our mailing list. Thereafter ask new potential contacts to complete a data consent protection form and return it to CPC if they want to be added to our mailing list.</p> <p>Destroy all historical contact information (whether hard or electronic) by 25<sup>th</sup> May where we do not have a completed consent form.</p> <p>From the 25<sup>th</sup> May, only hold contact information where people have completed a consent form.</p> <p>Keep contact information and consent forms only on the Cloud in the contacts folder and ensure all documents with contact details are password protected and the passwords only know to staff and volunteers who need access.</p> | <p>PC</p> |

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|  | We picked it up from emails where we were one of the recipients.     |   | <p>Ensure no contact details are kept on laptops.</p> <p>Destroy any hard copies containing contact information via shredding within one working day of it being received or generated.</p>  |    |
| Contact details of members of the public, including self-employed people | They supplied it when contacting us, e.g. for advice or information. | No one without the data subject's consent, unless required to do so by law or we feel it is necessary to protect vital interests. | <p>Ensure that no incoming communications containing contact details or other personal data (hard or electronic or phone) are retained for more than three years. Thus, routinely delete communications from members of the public who contact CPC.</p> <p>For the period for which communications are retained ensure that hard copies are retained in a locked filing cabinet and emails are retained in password protected email accounts.</p> <p>Delete phone messages within one day of listening to them or returning the call if longer. If a phone number is written in a note book to return the call then keep the note book in a locked cabinet.</p> <p>Ensure that the enquiry monitoring sheets (filed on the Cloud in the enquiries folder) only record the name and organisation of the person seeking advice or information. Delete all personal names at the end of each quarter and before the enquiry sheets are sent to Toby Taper for analyses.</p> <p>Ensure no enquiry sheets or related correspondence are kept on laptops.</p> <p>Destroy any hard copies containing contact information (other than when kept as above) via shredding.</p> | PC |
| Contact details of journalists   | They supplied it when contacting us e.g. for a briefing; a           | No one without the data subject's consent, unless   | <p>Ensure that no incoming communications containing contact details or other personal data (hard or electronic or phone) are retained for more than three years since the last contact. Thus, routinely delete communications from the media who contact CPC.</p>   | PC |

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|  | quote, or invite to an interview.  | required to do so by law.  | <p>For the period for which communications are retained ensure that hard copies are retained in a locked filing cabinet and emails are retained in password protected email accounts.</p> <p>Delete phone messages within one day of listening to them or returning the call if longer. If a phone number is written in a note book to return the call then keep the note book in a locked cabinet.</p> <p>Ensure that the enquiry monitoring sheets (filed on the Cloud in the enquiries folder) only record the name and organisation of the person seeking advice or information.</p> <p>Ensure no enquiry sheets or related correspondence are kept on laptops.</p> <p>Destroy any hard copies containing contact information (other than when kept as above) via shredding.</p> |    |
| <p>Rejected employee and councillor applicant records, including:</p> <ul style="list-style-type: none"> <li>- Contact details</li> <li>- Application letters or forms</li> <li>- CVs</li> <li>- References</li> <li>- Interview notes</li> <li>- Assessment and tests results</li> </ul> <p>Any other information gathered during the application process</p> | <p>They supplied it.</p> <p>It was produced during the interview and assessment process by CPC staff and trustees involved in the recruitment process.</p> | <p>No one without the data subject's consent, unless required to do so by law.</p> | <p>Ensure that such information (whether hard or electronic) is retained for no more than six months. Thus, schedule and routinely delete such information just before the six months is reached.</p> <p>Ensure the information is only kept for the above period by those directly involved in the assessment process in personal email folders that can only be accessed by password protection, or in the locked filing cabinet at CPC head office. This includes information received and recorded by trustees involved in the recruitment process.</p> <p>Destroy any hard work containing personal information (other than when being kept as above), e.g. contact details, manuscript notes of interview via shredding.</p>   | PC |

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| <p>Successful employee and councillor applicant records, including:</p> <ul style="list-style-type: none"> <li>- Application letters or forms</li> <li>- Copies of academic or other training received</li> <li>- References</li> <li>- Correspondence concerning employment</li> <li>- CVs</li> <li>- Interview notes and evaluation form</li> <li>- Assessment and psychological test and results</li> <li>- Any other information gathered during the application process</li> </ul> | <p>They supplied it.</p> <p>It was produced during the interview and assessment process by CPC staff and trustees involved in the shortlisting or interviewing.</p> | <p>No one without the data subject's consent, unless required to do so by law.</p> | <p>Ensure that such information (whether hard or electronic) is retained for six years after their volunteering has ceased. Thus, schedule and routinely delete such information just after the six years is reached.</p> <p>Ensure the information is only kept for the above period by those directly involved in the assessment process in personal email folders that can only be accessed by password protection, or in the locked filing cabinet at CPC head office. This includes information received and recorded by trustees involved in the recruitment process.</p> <p>Destroy any hard copies containing personal information (other than when being kept as above), e.g. contact details, manuscript notes of interviews/appraisals via shredding.</p> | <p>PC</p> |
| <p>Employment Contracts, including:</p>   | <p>CPC drafted employment contracts (and any changes to terms) as</p>   | <p>No one without the data subject's consent,</p>                                  | <p>Ensure that such information is retained for six years after employment has ceased. Thus, schedule and routinely delete such information just after the six years is reached.</p>   | <p>PC</p> |

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| <ul style="list-style-type: none"> <li>- Personnel and training records</li> <li>- Written particulars of employment</li> </ul> <p>Changes to terms and conditions</p>   | <p>signed by CPC chair and member of staff.</p> <p>CPC chair and staff generated personnel and training records.</p> | <p>unless required to do so by law.</p>  | <p>Ensure the information is kept for the above period in the employees' hard employment file in a locked cabinet and in the employees' electronic employment file on the Z drive of his/her manager with access password protected.</p> <p>Destroy ex-employees personal details (hard copies) via shredding.</p>  |           |
| <p>Copies of identification documents for staff</p>  | <p>They supplied it on request in order for CPC to meet its legal obligations.</p>                                   | <p>No one without the data subject's consent, unless required to do so by law.</p> | <p>Ensure that such information is retained for two years from the date of termination of employment. Thus, schedule and routinely delete such information just after the two years is reached.</p> <p>Ensure the information is kept for the above period in the employees' hard employment file in a locked cabinet and in the employees' electronic employment file on the cloud with access password protected.</p> <p>Destroy ex-employees identification documents (hard copies) via shredding.</p> | <p>PC</p> |
| <p>Employee performance and conduct records, including:</p> <ul style="list-style-type: none"> <li>- Probationary period reviews</li> <li>- Review meeting and assessment interview notes</li> <li>- Appraisals and evaluations</li> </ul> <p>Promotions and demotions</p> | <p>Completed by the line manager.</p>  | <p>No one without the data subject's consent, unless required to do so by law.</p> | <p>Ensure that such information is retained for six years after employment has ceased. Thus, schedule and routinely delete such information just after the six years is reached.</p> <p>Ensure the information is kept for the above period in the employees' hard employment file in a locked cabinet and in the employees' electronic employment file on the cloud with access password protected.</p> <p>Destroy ex-employees personal details (hard copies) via shredding.</p>                        | <p>PC</p> |

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| Redundancy records      | Completed by chair.                               | No one without the data subject's consent, unless required to do so by law. | <p>Ensure that such information is retained for six years from the date of redundancy. Thus, schedule and routinely delete such information just after the six years is reached.</p> <p>Ensure the information is kept for the above period in the employees' hard employment file in a locked cabinet and in the employees' electronic employment file on the cloud with access password protected.</p> <p>Destroy ex-employees leave records (hard copies) via shredding.</p>                             | PC |
| Annual leave records    | Completed by the employee and their line manager. | No one without the data subject's consent, unless required to do so by law. | <p>Ensure that such information is retained for six years after the end of the tax year it fell into. Thus, schedule and routinely delete such information just after the six years is reached.</p> <p>Ensure the information is kept for the above period in the employees' hard employment file in a locked cabinet and in the employees' electronic employment file on the cloud with access password protected.</p> <p>Destroy ex-employees leave records (hard copies) via shredding.</p>              | PC |
| Sickness records        | Completed by the employee their line manager.     | No one without the data subject's consent, unless required to do so by law. | <p>Ensure that such information is retained for six years after the end of the tax year it fell into. Thus, schedule and routinely delete such information just after the six years are years is reached.</p> <p>Ensure the information is kept for the above period in the employees' hard employment file in a locked cabinet and in the employees' electronic employment file on the cloud with access password protected.</p> <p>Destroy ex-employees sickness records (hard copies) via shredding.</p> | PC |
| Parental leave records. | Completed by the employee and their line manager. | No one without the data subject's consent, unless required to               | <p>Ensure that such information is retained for six years after the end of the tax year it fell into. Thus, schedule and routinely delete such information just after the six years is reached.</p> <p>Ensure the information is kept for the above period in the employees' hard employment file in a locked cabinet and in the employees' electronic employment file on the cloud with access password protected.</p>   | PC |

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|   |                                | do so by law.   | Destroy ex-employees parental leave records (hard copies) via shredding.  |    |
| Records of return to work meetings following sickness, maternity etc  | Completed by the line manager. | No one without the data subject's consent, unless required to do so by law. | <p>Ensure that such information is retained for six years after the end of the tax year it fell into. Thus, schedule and routinely delete such information just after the six years is reached.</p> <p>Ensure the information is kept for the above period in the employees' hard employment file in a locked cabinet and in the employees' electronic employment file on the cloud with access password protected.</p> <p>Destroy ex-employees return to work records (hard copies) via shredding.</p> | PC |
| <p>Records for the purposes of tax returns including</p> <ul style="list-style-type: none"> <li>- Wage or salary records</li> </ul> <p>Records of overtime, bonuses and expenses</p>                        | Generated by the Parish Clerk. | No one without the data subject's consent, unless required to do so by law. | <p>Ensure that such information is retained for six years. Thus, schedule and routinely delete such information just after the six years is reached.</p> <p>Ensure the information is kept for the above period only in HMRC Basic PAYE Tool which is password protected and on the Cloud payroll files which are also password protected.</p> <p>Destroy records for the purpose of tax returns (hard copies) via shredding.</p>   | PC |
| <p>PAYE records, including:</p> <ul style="list-style-type: none"> <li>- Wage sheets</li> <li>- Deductions wage sheets</li> </ul> <p>Calculations of the PAYE income of employees and relevant payments</p> | Generated by the Parish Clerk. | No one without the data subject's consent, unless required to do so by law. | <p>Ensure that such information is retained for three years. Thus, schedule and routinely delete such information just after the three years is reached.</p> <p>Ensure the information is kept for the above period only in the HMRC Basic PAYE Tool which is password protected and on the Cloud payroll files which are password protected.</p> <p>Destroy records for the purpose of PAYE records (hard copies) via shredding.</p>   | PC |
| <p>HMRC records, including:</p> <ul style="list-style-type: none"> <li>- Income tax and NI returns</li> </ul>   | Generated by the Parish Clerk. | No one without the data subject's consent,                                  | Ensure that such information is retained for three years after the end of the relevant financial year. Thus, schedule and routinely delete such information just after the three years is reached.  | PC |

|  |                                |   |   |    |
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| - Income tax records   |                                | unless required to do so by law.  | Ensure the information is kept for the above period only in HMRC Basic PAYE Tool which is password protected and on the Cloud payroll files which are password protected.<br><br>Destroy HMRC records (hard copies) via shredding.  |    |
| Correspondence with HMRC   |                                |   | Ensure that such information is retained for six years after the end of the relevant financial year. Thus, schedule and routinely delete such information just after the six years is reached.<br><br>Ensure the information is only kept for the above period in personal email folders that can only be accessed by password protection, or in the locked filing cabinet at CPC office.<br><br>Destroy HMRC correspondence (hard copies) via shredding. | PC |
| Details of:<br>- Benefits in kind<br>- Income tax records (P45, P60, P58, P48 etc)<br>- Annual return of taxable pay<br>Tax paid | Generated by the Parish Clerk. | No one without the data subject's consent, unless required to do so by law. | Ensure that such information is retained four years after the end of the relevant financial year. Thus, schedule and routinely delete such information just after the four years is reached.<br><br>Ensure the information is kept for the above period in HMRC Basic PAYE Tool only which is password protected.<br><br>Destroy such details (hard copies) via shredding.  | PC |
| Employee income tax and national insurance returns, and associated HMRC correspondence   | Generated by the Parish Clerk. | No one without the data subject's consent, unless required to do so by law. | Ensure that such information is retained for three years from end of tax year to which they relate. Thus, schedule and routinely delete such information just after the three years is reached.<br><br>Ensure the information is kept for the above period only in HMRC Basic PAYE Tool only which is password protected.<br><br>Destroy such returns (hard copies) via shredding.  | PC |

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|--|--|---|---|----|
| Statutory Sick Pay (SSP) records   | Generated by the Parish Clerk.   | No one without the data subject's consent, unless required to do so by law. | <p>Ensure that such information is retained for three years after the end of the tax year to which they relate. Thus, schedule and routinely delete such information just after the three years is reached.</p> <p>Ensure the information is kept for the above period in the employees' hard employment file in a locked cabinet and in the employees' electronic employment file on the Z drive of his/her manager with access password protected.</p> <p>Destroy such returns SSP records (hard copies) via shredding.</p> | PC |
| Wage or salary records including overtime, bonuses and expenses and  | Generated by the Parish Clerk.   | No one without the data subject's consent, unless required to do so by law. | <p>Ensure that such information is retained for six years. Thus, schedule and routinely delete such information just after the six years is reached.</p> <p>Ensure the information is kept for the above period only in HMRC Basic PAYE Tool which is password protected.</p> <p>Destroy such records (hard copies) via shredding.</p>  | PC |
| <p>Records of reportable injuries, diseases or dangerous occurrences, including:</p> <ul style="list-style-type: none"> <li>- Reportable incidents</li> <li>- Reportable diagnoses</li> </ul> <p>Injury arising from an accident at work (including Condoover Parish Council' accident book)</p> | Recorded by the director in accordance with CPC's health and safety policies | No one without the data subject's consent, unless required to do so by law. | <p>Ensure that such information is retained for three years. Thus, schedule and routinely delete such information just after the three years is reached.</p> <p>Ensure the information is kept for the above period on the Cloud in a health and safety file with access password protected. (Please note, the file should be created on the generation of the first record).</p> <p>Destroy such records (hard copies) via shredding.</p>  | PC |



## Human resources document retention policy

Condover Parish Council has adopted the following human resources document retention policy.

### 1. Introduction

- 1.1 This policy sets out how long employment-related information will normally be held by Condover Parish Council and when that information will be confidentially destroyed.
- 1.2 This policy covers information held in both paper and electronic form.

### 2 Responsibility

- 2.1 The Data Protection Officer (DPO) is responsible for implementing and monitoring compliance with this policy.
- 2.2 The DPO will undertake an annual review of this policy to verify that it is in effective operation.

### 3 Our process

- 3.1 Information (hard copy and electronic) will be retained for at least the period specified in our Records Retention schedule (see below).
- 3.2 All information must be reviewed before destruction to determine whether there are special factors that mean destruction should be delayed, such as potential litigation, complaints or grievances.
- 3.3 Hard copy and electronically-held documents and information must be deleted at the end of the retention period.
- 3.4 Hard copy documents and information must be disposed of by either shredding or placing in confidential waste sacks.

### 4 Retention Schedule

- 4.1 The retention schedule below sets out the time periods that different types of employment related business records will be retained for business and legal purposes. The retention periods are based on business need and legal requirements.
- 4.2 Where types of records are not listed in this Schedule, and it is not clear from the existing record types what retention period should apply, please contact the Data Protection Officer for guidance.
- 4.3 Any deviation from the retention periods in this Schedule must be approved in advance by the DPO.

| Record  | Recommended Retention Period   | Storage Format      | Reference   |
|---|--|---------------------|---|
| <b>A: Personnel Records</b>   |  |                     |   |
| Rejected Job Applicant Records, including: <ul style="list-style-type: none"> <li>- Contact details</li> <li>- Application letters or forms</li> <li>- CVs</li> <li>- References</li> <li>- Certificates of good conduct</li> <li>- Interview notes</li> <li>- Assessment and psychological tests results</li> <li>- Any other information gathered during the application process</li> </ul> | 6 months after the applicant is notified of rejection or longer where the applicant agrees for their CV/application to be kept on file | Paper or electronic | ICO Employment Practices Code para 1.7<br><br>Equality Act 2010 s.123 |

| <b>Record</b>  | <b>Recommended Retention Period</b> | <b>Storage Format</b> | <b>Reference</b>         |
|--|-------------------------------------|-----------------------|--------------------------|
| <p>Successful Job Applicant Records, including:</p> <ul style="list-style-type: none"> <li>- Application letters or forms</li> <li>- Copies of academic or other training received</li> <li>- References</li> <li>- Correspondence concerning employment</li> <li>- CVs</li> <li>- Interview notes and evaluation form</li> <li>- Assessment and psychological test papers and results</li> <li>- Any other information gathered during the application process</li> </ul> | 6 years after employment ceases     | Paper or electronic   | Limitation Act 1980, s.5 |

| Record  | Recommended Retention Period   | Storage Format      | Reference  |
|---|--|---------------------|--|
| Employment Contracts, including: <ul style="list-style-type: none"> <li>- Personnel and training records</li> <li>- Written particulars of employment</li> <li>- Changes to terms and conditions</li> </ul> | 6 years after employment ceases<br><b>OR</b> 12 years where the document is executed as a deed | Paper or electronic | Limitation Act 1980, s.5   |
| Copies of Identification Documents e.g. passports   | At least 2 years from the date of termination of employment                                    | Paper or electronic | Immigration (Restrictions on Employment) Order SI 2007/3290, Art 6(1)(b) |
| Identification Documents and Right to Work Documents for Foreign Nationals  | At least 2 years from the date of termination of employment                                    | Paper or electronic |  |
| Records on Temporary Workers  | 6 years after employment ceases  | Paper or electronic | Limitation Act 1980, s.5   |

| <b>Record</b>   | <b>Recommended Retention Period</b>    | <b>Storage Format</b> | <b>Reference</b>         |
|---|--|-----------------------|--------------------------|
| Employee Performance and Conduct Records, including: <ul style="list-style-type: none"> <li>- Probationary period reviews</li> <li>- Review meeting and assessment interview notes</li> <li>- Appraisals and evaluations</li> <li>- Promotions and demotions</li> </ul> | 6 years after employment ceases        | Paper or electronic   | Limitation Act 1980, s.5 |
| Redundancy Records  | 6 years from the date of redundancy    | Paper or electronic   | Limitation Act 1980, s.5 |
| Annual Leave Records  | 6 years after the end of each tax year | Paper or electronic   | Limitation Act 1980, s.5 |
| Parental Leave Records  | 6 years after the end of each tax year | Paper or electronic   | Limitation Act 1980, s.5 |
| Sickness Records  | 6 years after the end of each tax year | Paper or electronic   | Limitation Act 1980, s.5 |
| Records of Return to Work Meetings following sickness, maternity etc  | 6 years after the end of each tax year | Paper or electronic   | Limitation Act 1980, s.5 |
| <b>B: Payroll and Salary Records</b>  |  |                       |                          |

| <b>Record</b>  | <b>Recommended Retention Period</b>                              | <b>Storage Format</b> | <b>Reference</b>   |
|--|--|-----------------------|--|
| Records for the purposes of tax returns including <ul style="list-style-type: none"> <li>- Wage or salary records</li> <li>- Records of overtime, bonuses and expenses</li> </ul>                        | 6 years  | Paper or electronic   | Taxes Management Act, 1970 s 12B<br>Finance Act 1998, Schedule 18, para 21 |
| PAYE records, including: <ul style="list-style-type: none"> <li>- Wage sheets</li> <li>- Deductions wage sheets</li> <li>- Calculations of the PAYE income of employees and relevant payments</li> </ul> | 3 years  | Paper or electronic   | Income Tax (Pay As You Earn) Regulations 2003, SI 2003/2682, reg 97        |
| HMRC records, including: <ul style="list-style-type: none"> <li>- Income tax and NI returns</li> <li>- Income tax records</li> <li>- Correspondence with HMRC</li> </ul>                                 | 3 years after the end of the financial year to which they relate | Paper or electronic   | Income Tax (Employments) Regulations 1993, SI 1993/744, reg 55             |

| <b>Record</b>   | <b>Recommended Retention Period</b>                        | <b>Storage Format</b> | <b>Reference</b>  |
|---|--|-----------------------|---|
| Details of: <ul style="list-style-type: none"> <li>- Benefits in kind</li> <li>- Income tax records (P45, P60, P58, P48 etc)</li> <li>- Annual return of taxable pay</li> <li>- Tax paid</li> </ul> | 4 years  | Paper or electronic   | Taxes Management Act 1970   |
| Employee income tax and national insurance returns, and associated HMRC correspondence  | 3 years from end of tax year to which they relate          | Paper or electronic   | Income Tax (Pay as You Earn) Regulations 2003, SI 2003/2682, reg 97   |
| Statutory Sick Pay (SSP) Records  | 3 years after the end of the tax year to which they relate | Paper or electronic   | An employer may be required by HMRC to produce records in their possession or power which contain or main contain information relevant to satisfy HMRC that SSP has been and is being paid. |
| Wage or salary records including overtime, bonuses and expenses   | 6 years  | Paper or electronic   | Taxes Management Act 1970, s.43   |
| <b>C: Health and Safety Records</b>   |  |                       |   |

| <b>Record</b>   | <b>Recommended Retention Period</b>   | <b>Storage Format</b>      | <b>Reference</b>  |
|---|---------------------------------------|----------------------------|---|
| <p>Records of reportable injuries, diseases or dangerous occurrences, including:</p> <ul style="list-style-type: none"> <li>- Reportable incidents</li> <li>- Reportable diagnoses</li> <li>- Injury arising from an accident at work (including Condover Parish Council' accident book)</li> </ul> | <p>3 years from date of the entry</p> | <p>Paper or electronic</p> | <p>The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR 2013), SI 2013/1471, reg 12</p> |

## Website privacy statement

Condever Parish Council has adopted a new website privacy statement in as follows.

We are committed to safeguarding the privacy of our website visitors; this statement sets out how we will treat your personal information.

Our website is designed to comply with the General Data Protection Regulation 2016 and the Data Protection Act 2018 (referred together in this Statement as 'the UKGDPR' for ease of reference).

### (1) What information do we collect?

We may collect, store and use the following kinds of personal data:

- (a) Information about your computer and about your visits to and use of this website (including your IP address, geographical location, browser type, referral source, length of visit and number of page views);
- (b) Information relating to any transactions carried out between you and us on or in relation to this website;
- (c) Information that you provide to us for the purpose of subscribing to our website services, email notifications and/or newsletters including name, email address and telephone number;
- (d) Any other information that you choose to send to us.

We use Google Analytics to analyse the use of this website. Google Analytics generates statistical and other information about website use by means of cookies, which are stored on users' computers. The information generated relating to our website is used to create reports about the use of the website. Google will store this information. Google's privacy policy is available at: <http://www.google.com/privacypolicy.html>.

### (2) Using your personal data

Personal data submitted on this website will be used for the purposes specified in this Privacy Statement or in relevant parts of the website. We may use your personal information to:

- (a) Administer the website;
- (b) Improve your browsing experience by personalising the website;

- (c) Enable your use of the services available on the website;
- (d) Where applicable supply to you services purchased via the website;
- (e) Send statements and invoices to you, and collect payments from you;
- (f) Send you general (non-marketing) commercial communications;
- (g) Send you email notifications which you have specifically requested;
- (h) Send to you our newsletter and other marketing communications relating to our business which we think may be of interest to you by post or, where you have specifically agreed to this, by email or similar technology (you can inform us at any time if you no longer require marketing communications);
- (i) provide third parties with statistical information about our users but this information will not be used to identify any individual user;
- (j) deal with enquiries and complaints made by or about you relating to the website.

If at any time you submit personal information for publication on our website, we will publish and otherwise use that information in accordance with the permission you grant to us.

We will not without your express consent provide your personal information to any third parties for the purpose of PCect marketing.

### (3) Disclosures

We may disclose information about you to any of our employees, officers, agents, suppliers or subcontractors insofar as reasonably necessary for the purposes as set out in this Privacy Statement.

In addition, we may disclose information about you:

- (a) to the extent that we are required to do so by law;
- (b) in connection with any legal proceedings or prospective legal proceedings;
- (c) in order to establish, exercise or defend our legal rights (including providing information to others for the purposes of prevention and detection of fraud) and
- (d) for the purposes of our legitimate business interests.

Except as provided in this Privacy Statement or otherwise permitted under the GDPR, we will not provide your information to third parties.

#### (4) Security of your personal data

We will use your personal data in a way which ensures appropriate security of the data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures. Personal information will be stored on secure servers managed by the Condover Parish Council Agency and all its associates and suppliers.

#### (5) Amendments to this statement

We may update this privacy statement from time-to-time by posting a new version on our website. You should check this page occasionally to ensure you are happy with any changes.

We may also notify you of changes to our Privacy Statement by email.

#### (6) Your rights

You may instruct us to provide you with any personal information we hold about you.

You may instruct us not to process your personal data for marketing purposes by email at any time. (In practice, you will usually either expressly agree in advance to our use of your personal data for marketing purposes, or we will provide you with an opportunity to opt-out of the use of your personal data for marketing purposes.)

Under the UKGDPR you also have the following rights:

**The right to erasure:** the right to erasure is also known as 'the right to be forgotten'. This enables you to request the deletion or removal of personal data where there is no compelling reason for its continued processing by the Condover Parish Council Agency.

**Restriction on processing:** a data subject has the right to require a controller to stop processing his/her personal data. When processing is restricted, we are allowed to store the personal data, but not further process it.

**Objection to processing:** individuals have the right to object to processing in certain circumstances. We must stop processing the personal data unless we can demonstrate compelling legitimate grounds for the processing, which override the interests, rights and

freedoms of the individual; or the processing is for the establishment, exercise or defence of legal claims by/against the Condover Parish Council Agency.

Withdrawal of consent: an individual has the right to withdraw consent at any time. If you withdraw your consent it may be that another reason for processing can be relied on by the Condover Parish Council Agency such as legitimate interests.

(7) Third party websites

The Condover Parish Council Agency is not responsible for the privacy policies or practices of third party websites accessed through links on our site.

(8) Updating information

Please let us know if the personal information which we hold about you needs to be corrected or updated by emailing [condoverpc@gmail.com](mailto:condoverpc@gmail.com)

(9) Contact

If you have any questions about this privacy statement or our treatment of your personal data, please write to us by email to [condoverpc@gmail.com](mailto:condoverpc@gmail.com)

or by post to The Condover Parish Council, Dorrington Village Hall, Dorrington, Shrewsbury SY5 7LD

(10) Data controller

The data controller responsible for our website is the Parish Clerk and they can be contacted via [condoverpc@gmail.com](mailto:condoverpc@gmail.com)

## Subject Access Request Form

[Your full address]

[Phone number]

[The date]

To: The Condover Parish Council

Dear Sir or Madam

### **Subject access request**

[Insert your full name and address and any other details to help identify you and the information you want.]

Please supply the information about me I am entitled to under the UK General Data Protection Regulations relating to: [give specific details of the information you want]

If you need any more information from me in order to process my request, please let me know as soon as possible.

It may be helpful for you to know that a request for information under the UK General Data Protection Regulations should be responded to as soon as possible and within one month at the latest.

If you do not normally deal with these requests, please pass this letter to your Data Protection Officer. If you need advice on dealing with this request, the Information Commissioner's Office can assist you and can be contacted on 0303 123 1113 or at [ico.org.uk](https://ico.org.uk)

Please provide the information in [electronic form by email] / [in hard copy format] [say which you want]

Yours faithfully

[Signature]