



## **WELLINGTON TOWN COUNCIL** **GDPR/DATA PROTECTION POLICY**

### **1. Introduction**

Wellington Town Council is committed to protecting the privacy and personal data of its employees, residents, customers, councillors, contractors, and other stakeholders. This policy outlines the Council's approach to data protection and its commitment to complying with all applicable data protection legislation.

The Council processes personal data in accordance with:

- The UK General Data Protection Regulation (UK GDPR)
- The Data Protection Act 2018
- The Privacy and Electronic Communications Regulations (PECR)
- Any other applicable data protection and privacy legislation in force from time to time

This policy demonstrates the Council's commitment to maintaining high standards of data protection, transparency, and accountability.

### **2. Scope**

This policy applies to:

- All employees of Wellington Town Council
- Councillors
- Contractors, consultants, and agency staff
- Volunteers
- Third-party service providers processing data on behalf of the Council

It covers all personal data collected, stored, used, recorded, disclosed, or otherwise processed by the Council, whether held in electronic or paper form.

### **3. Data Protection Principles**

Wellington Town Council adheres to the data protection principles set out in the UK GDPR. Personal data shall be:

1. Processed lawfully, fairly and transparently  
Personal data will only be processed where there is a lawful basis and individuals will be informed how their data is used.
2. Collected for specified, explicit and legitimate purposes  
Personal data will not be further processed in a manner incompatible with those purposes.

3. Adequate, relevant and limited to what is necessary  
Only the minimum personal data necessary for the intended purpose will be collected and processed.
4. Accurate and kept up to date  
Reasonable steps will be taken to ensure inaccurate data is corrected or deleted without delay.
5. Kept for no longer than necessary  
Personal data will be retained in accordance with the Council's retention schedule and securely disposed of when no longer required.
6. Processed securely  
Appropriate technical and organisational measures will be used to protect personal data against unauthorised or unlawful processing, accidental loss, destruction, or damage.
7. Accountable  
The Council is responsible for, and able to demonstrate, compliance with data protection legislation.

#### **4. Roles and Responsibilities**

Democratic Services and Finance Manager (Data Protection Lead)

Wellington Town Council does not have a formally appointed Data Protection Officer (DPO). Responsibility for data protection compliance is delegated to the Democratic Services and Finance Manager (DSFM), who acts as the Council's Data Protection Lead.

The DSFM is responsible for:

- Overseeing the implementation and monitoring of this policy
- Ensuring compliance with data protection legislation
- Advising the Council on data protection obligations
- Acting as the primary contact for data protection matters
- Liaising with the Information Commissioner's Office (ICO) where required
- Managing data breach procedures and responses

#### Employees and Councillors

All staff and councillors must:

- Familiarise themselves with this policy
- Comply with data protection procedures and guidance
- Only access personal data necessary for their role
- Keep personal data secure and confidential
- Report suspected data breaches immediately to the Responsible Financial Officer

#### Management

Senior officers and management are responsible for:

- Ensuring adequate resources are available for data protection compliance
- Implementing appropriate technical and organisational security measures
- Promoting a culture of good data protection practice
- Ensuring staff receive appropriate data protection training

#### **5. Lawful Basis for Processing**

The Council will only process personal data where a lawful basis applies under Article 6 of the UK GDPR. These include:

- Consent of the data subject
- Performance of a contract
- Compliance with a legal obligation
- Protection of vital interests
- Performance of a task carried out in the public interest or in the exercise of official authority
- Legitimate interests pursued by the Council or a third party

Special category data will only be processed where additional lawful conditions are met.

## **6. Data Collection and Use**

- Personal data will be collected only for specified and lawful purposes.
- Individuals will be informed about how their data will be used through privacy notices.
- Personal data will not be used for purposes unrelated to those originally specified unless required by law or with appropriate consent.
- The Council will ensure data minimisation in all its services and activities.

## **7. Data Security**

Wellington Town Council implements appropriate technical and organisational security measures to protect personal data, including:

- Access controls and user authentication
- Secure storage of paper and electronic records
- Encryption and password protection where appropriate
- Secure transmission of data
- Regular data backups
- Cybersecurity monitoring and protection measures
- Staff training in data protection and information security

Access to personal data is restricted to authorised personnel only.

## **8. Data Subject Rights**

Individuals have rights regarding their personal data. These include:

- The right to be informed
- The right of access
- The right to rectification
- The right to erasure
- The right to restrict processing
- The right to data portability
- The right to object
- Rights in relation to automated decision-making and profiling

Requests to exercise these rights must be made in writing and will be responded to within statutory time limits.

## **9. Data Sharing and Transfers**

Personal data may be shared with other public bodies, government agencies, service providers, and partners where lawful and necessary.

Personal data will not be transferred outside the UK unless:

- The destination country has been deemed to provide an adequate level of protection, or
- Appropriate safeguards are in place, such as International Data Transfer Agreements (IDTAs) or other approved mechanisms

## **10. Data Retention and Disposal**

The Council will not retain personal data for longer than necessary. Retention periods are defined in the Council's Document Retention Schedule.

Personal data will be securely destroyed or deleted when no longer required.

## **11. Data Breach Management**

Wellington Town Council has procedures in place to detect, investigate, and respond to personal data breaches.

In the event of a breach:

- The Responsible Financial Officer must be notified immediately
- Breaches will be assessed and recorded
- The Information Commissioner's Office will be notified within 72 hours where legally required
- Affected individuals will be informed where there is a high risk to their rights and freedoms
- Measures will be taken to contain and mitigate risks

## **12. Training and Awareness**

The Council will ensure that all staff and councillors receive appropriate data protection training and guidance relevant to their roles.

## **13. Policy Review**

This policy will be reviewed regularly and updated to reflect changes in legislation, guidance, and Council practices.

Signed on behalf of Wellington Town Council  
Chief Executive/Town Clerk

Date: Adopted May 2026