



Blockley Parish Council  
**Councillors - Privacy Notice** APRIL 2025  
Minute ref: 17.04.25.6.6.d

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## **Who we are and what we do**

In order for the councillors of Blockley parish Council (the 'council') to receive and process your request for assistance or respond to your enquiry, it is necessary to collect, store and process personal data to provide you with relevant information, services or support.

Elected & Co-Opted councillors are data controllers and accountable for the processing of personal information in connection with requests received from constituents.

This notice is provided within the context of the changes required by the current Data Protection Legislation which consists of the UK General Data Protection Regulation (GDPR) and the Data Protection Act 2018 (DPA 2018).

Any questions regarding our privacy practices should be sent to:

Nikki Holt  
Parish Clerk & Data Protection Lead  
Blockley Parish Council  
Heritage centre, Park Road, Blockley, GL56 9BY  
Email: [parishclerk@blockleyparish.gov.uk](mailto:parishclerk@blockleyparish.gov.uk)  
Tel: 01386 701602

## **Why we need your information and how we use it**

Councillors get your personal information from you, other constituents, groups or members of the public in relation to matters which they have been asked to pursue in the interests of individuals and groups who live in their ward.

Your personal information will be included as part of details of cases of interest, as part of information provided by signatories on petitions, responses to questionnaires and contact details for the purpose of communicating news and updates.

## **Who we will share your personal information with**

If you have contacted your councillor about a personal concern or policy issue, they may pass your personal data on to a third-party in the course of dealing with your request or query, such as local authorities, government agencies, public bodies and regulators. They may also pass your information to 'council' officers in order to allow them to assist with the matter.

Any third parties with whom councillors may share your data are obliged to keep your details securely, and to only use your data for purposes already communicated to you.

If you specifically ask councillors not to disclose information identifying you to other third parties it is necessary for them to contact, they will try to respect that. However, it must be noted that it may not be possible to progress a matter for you on an anonymous basis.

We will not pass personal details of constituents who contact councillors to anyone else unless required to do so by law or where this is in connection with a criminal investigation. The councillors will never sell your data. However, they may share some of your personal information with third parties to:

- help the councillors if they need additional professional or legal advice on a matter relating to you.
- to improve and optimise the performance of websites and social media accounts. Analytics and search engine providers that councillors use can collect your data when interacting online. However, they will aggregate and anonymise the information, meaning individuals will not be personally identifiable.

## **What information we hold**

In order to provide this service, councillors may need to process some personal information which will generally include your name, address and contact information together with details of your problem or concern. It is not deemed within the scope of the Parish council to collect what GDPR has classed as special category of data including race or ethnic group, sexuality and sexual life, religious or philosophical beliefs, trade union membership, genetic and biometric data, physical or mental health, as well as criminal convictions.

## **The lawful basis for collecting and processing your information**

Councillors may use your information in dealing with your requests when you ask them to pursue a matter on your behalf. Local authorities' councillors can process your personal information to carry out tasks under the lawful bases of 'legitimate interests' basis and/or 'consent'.

The legal bases relied on for processing personal information in relation to responding to requests from constituents are:

- Consent or explicit consent of the constituent making the request (or any other relevant persons where this is appropriate)
- necessary in pursuit of the councillor's legitimate interests as an elected or co-opted representative and those of their constituents; and it is assessed these interests override any privacy intrusion involved in processing personal data about other individuals;
- discharging functions as an elected representative for the purpose of responding to requests from constituents where this is permissible, without explicit consent.

## **Additional lawful basis for processing other categories of data**

It is not considered within the scope of the parish council to collect information classified as special category personal data or personal data consisting of criminal convictions and offences (including alleged offences).

It is considered matters of this nature should be handled exclusively by other government organisations and elected officials. In order to process special category of data, the councillors need to have an additional lawful basis to above. In this instance, special category of data is processed for exercising specific rights of the council under the Data Protection (Processing of Sensitive Personal Data) (Elected Representatives) Order 2002. And where the council collects and process criminal convictions information e.g. when assisting with other government agencies as required by law, this is done lawfully under the provisions of the Data Protection Act 2018.

If you provided personal information about someone other than yourself, we may need to check the facts with that other person. If you ask the councillors to take action on behalf of a friend or relative, they may need to contact that person to confirm that they are happy for them to act on their behalf. If you feel it would not be appropriate for the councillors to contact the other person, you should discuss this at the point of giving this other person's information.

## **Ward news and events**

Your local councillors may like to send you information about ward news and events, but they will not use your contact details to do this unless you have said that you would like to be sent this information.

If you have said that you would like this information, but later change your mind, you have a right at any time to let us know if you no longer wish to be sent this information. If you wish to receive or stop receiving this information, please contact your local councillor or parish officer.

## **How long we keep your information (retention period)**

We will process your personal data until your matter has been resolved and will store electronic data and paper records for no more than six (6) years. This is facilitate a case history and to return to records should further matters arise.

## **How we protect your Information**

Reasonable security measures are taken to ensure that personal information within the councillor's control is protected from accidental loss or alteration, inappropriate access, misuse or theft.

Communications addressed by post to councillors at the council office or using council email address are held securely on site or on a dedicated controlled area of the council's secure network with access restricted in accordance with councillor instructions.

Please note however that where you are transmitting information to the councillor over the internet this can never be guaranteed to be 100% secure.

The councillor or Council Data Protection Officer will notify you promptly in the event of any breach of your personal data which might expose you to serious risk.

## **Your rights**

You have rights under the Data Protection legislation:

- to access your personal data
- to be provided with information about how your personal data is processed
- to have your personal data corrected
- to have your personal data erased in certain circumstances
- to object to or restrict how your personal data is processed
- to have your personal data transferred to yourself or to another business in certain circumstances
- you have the right to be told if we have made a mistake whilst processing your data and we will report breaches to the Commissioner.

## **Individual Rights**

As a data subject, you have a number of rights in relation to your personal data.

### **Subject access requests**

You have the right to make a subject access request. If you make a subject access request, the council will tell you:

- whether or not your data is processed and if so why, the categories of personal data concerned and the source of the data if it is not collected from yourself;

- to whom your data is or may be disclosed, including to recipients located outside the European Economic Area (EEA) and the safeguards that apply to such transfers;
- for how long your personal data is stored (or how that period is decided);
- your rights to rectification or erasure of data, or to restrict or object to processing;
- your right to complain to the Information Commissioner if you think the council has failed to comply with your data protection rights; and
- whether or not the council carries out automated decision-making and the logic involved in any such decision-making.

The council will also provide you with a copy of your personal data undergoing processing. This will normally be in electronic form if you have made a request electronically, unless you agree otherwise.

If you want additional copies, the council may charge a fee, which will be based on the administrative cost to the council of providing the additional copies.

To make a subject access request, you should send the request to the Clerk or Chairman of the Council. In some cases, the council may need to ask for proof of identification before the request can be processed. The council will inform you if we need to verify your identity and the documents we require.

The council will normally respond to a request within a period of one month from the date it is received. Where the council processes large amounts of your data, this may not be possible within one month. The council will write to you within one month of receiving the original request to tell you if this is the case.

If a subject access request is manifestly unfounded or excessive, the council is not obliged to comply with it. Alternatively, the council can agree to respond but will

charge a fee, which will be based on the administrative cost of responding to the request. A subject access request is likely to be manifestly unfounded or excessive where it repeats a request to which the council has already responded. If you submit a request that is unfounded or excessive, the council will notify you that this is the case and whether or not we will respond to it.

## **Other rights**

You have a number of other rights in relation to your personal data. You can require the council to:

- rectify inaccurate data;
- stop processing or erase data that is no longer necessary for the purposes of processing;
- stop processing or erase data if your interests override the council's legitimate grounds for processing data (where the council relies on our legitimate interests as a reason for processing data);
- stop processing or erase data if processing is unlawful; and
- stop processing data for a period if data is inaccurate or if there is a dispute about whether or not your interests override the council's legitimate grounds for processing data.
- complain to the Information Commissioner. You can do this by contacting the Information Commissioner's Office directly. Full contact details including a helpline number can be found on the Information Commissioner's Office website ([www.ico.org.uk](http://www.ico.org.uk)).

To ask the council to take any of these steps, you should send the request to the Clerk or Chairman of the Council.

## **Data security**

The council takes the security of personal data seriously. The council has internal policies and controls in place to protect personal data against loss, accidental destruction, misuse or disclosure, and to ensure that data is not accessed, except by employees in the proper performance of their duties.

Where the council engages third parties to process personal data on our behalf, such parties do so on the basis of written instructions, are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data.

## **Further information**

If you would like to know more about how we use your information, please contact the councillor or the Data Protection Officer directly.

You can also complain to the Information Commissioner: <https://ico.org.uk>

Last reviewed by Cllr John 14<sup>th</sup> April 2025