

Knowsley Town Council



Data Protection Policy

Adopted: 19/02/2026

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Applies to: Councillors, Staff, Contractors & Volunteers

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Knowsley Town Council

Data Protection Policy

1. Purpose

This policy sets out how Knowsley Town Council complies with its legal obligations under the **UK General Data Protection Regulation (UK GDPR)** and the **Data Protection Act 2018**. It ensures personal data is collected, used, stored and deleted securely and lawfully.

2. Scope

This policy applies to:

- All Councillors and Co-opted Members
- All employees and volunteers
- Contractors and third parties who process data on behalf of the Council

It applies to **all personal data** held in any format: digital, written, email, photos, recordings or CCTV (if applicable).

3. Roles and Responsibilities

a) Data Controller

Knowsley Town Council is the **Data Controller**. The Clerk acts as the key point of contact for data matters.

b) All Users

Councillors, staff and volunteers must:

- Handle data lawfully, fairly, and transparently
- Only use data for authorised purposes
- Keep data accurate and up to date
- Store it securely and not retain it longer than necessary
- Report any breaches or incidents immediately

4. The 6 Data Protection Principles

All processing of personal data must comply with the following principles:

1. **Lawfulness, fairness and transparency**
2. **Purpose limitation** – used only for specified lawful purposes
3. **Data minimisation** – only what is necessary
4. **Accuracy** – kept up to date
5. **Storage limitation** – not kept longer than needed
6. **Integrity and confidentiality** – kept secure
- 7.

5. Lawful Basis For Processing

Knowsley Town Council will only process personal data where a lawful basis applies under Article 6 of the UK GDPR.

The Council primarily relies on the following lawful bases:

- **Public task** – where processing is necessary to carry out the Council’s statutory and governance functions
- **Legal obligation** – where processing is required by law (e.g. financial records, employment, FOI)
- **Contract** – where processing is necessary to fulfil contractual obligations (e.g. staff, contractors, hirers)

Consent will only be used where no other lawful basis applies and will not be assumed or implied. Where consent is relied upon, it will be clearly recorded and may be withdrawn at any time.

6. Special Category and Criminal Offence Data

Knowsley Town Council does **not** process Special Category or Criminal Offence data as defined in the Data Protection Act 2018.

Should this position change in the future, the Council will ensure an **Appropriate Policy Document (APD)** is adopted in line with Schedule 1 of the Act, and processing will be limited to lawful conditions only.

7. Data Rights of Individuals

All individuals have the right to:

- Be informed (via privacy notices)
- Access their data (Subject Access Requests)
- Request rectification or erasure
- Restrict or object to processing
- Data portability (rare for councils)

Requests must be acknowledged and responded to within **one calendar month**.

8. Subject Access Requests (SARs)

Requests must be made in writing (including email) and submitted to the Clerk. The Council must:

- Confirm identity
- Respond within one month
- Supply a copy of the personal data held (unless exempt)

9. Data Breaches

Any personal data breach must be:

- Reported immediately to the Clerk

- Investigated and, if necessary, reported to the **Information Commissioner's Office (ICO)** within **72 hours**

All breaches must be documented.

10. Data Retention and Disposal

The Council follows its **Document Retention Policy** and NALC guidelines. Personal data will not be kept longer than necessary.

When no longer needed, personal data will be:

- Shredded (paper)
- Securely deleted (digital)

11. Data Sharing and Third Parties

Data may only be shared with:

- Third parties named in a privacy notice
- Public bodies when legally required (e.g. HMRC, Electoral Services)
- Contractor's processing data on behalf of the Council (must sign a data processing agreement)

12. Use of Email and IT

- Council email addresses must be used for official business
- Sensitive data should not be sent unencrypted
- Data stored digitally must be password-protected
- Councillors must avoid storing personal data on personal devices without approval

13. Website, Social Media and Public Information

- The Council's website must display a Privacy Notice and appropriate contact details
- Public-facing forms (online or print) must explain how personal data will be used
- Social media messages may contain personal data and must be managed accordingly

14. Training and Awareness

- All staff and Members must receive data protection guidance
- New users will receive induction and access to the policy
- Ongoing awareness will be promoted by the Clerk/RFO

15. Monitoring and Review

This policy will be reviewed annually or sooner if required by law or operational changes.