



## **Hebden Royd Town Council – Privacy Notice for Councillors**

This Privacy Notice explains how Hebden Royd Town Council processes personal data relating to councillors in the course of their official functions, in accordance with Articles 13 and 14 of the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

### **Data Controller**

Hebden Royd Town Council

Council Offices, The Town Hall, St Georges Street, Hebden Bridge, HX7 7BY

Contact: Town Clerk

Data Protection Officer: The Privacy Worx Ltd, [dpo@theprivacyworx.com](mailto:dpo@theprivacyworx.com)

### **Scope and roles**

This notice covers the Council's processing of personal data about councillors when acting in their official capacity within the Council's governance framework. When councillors handle residents' personal data for individual casework in their own right, they may act as separate data controllers and should provide their own privacy information for that activity.

### **Personal data processed**

Name and contact details (postal address, email, telephone)

Councillor role and responsibilities

Attendance at meetings, voting records, declarations of interest

Expenses, allowances and payments

Correspondence with officers, councillors and members of the public in the course of Council business

Information contained in complaints, investigations or governance matters

### **Lawful basis for processing**

Processing is necessary under Article 6(1)(c) UK GDPR (compliance with a legal obligation), including obligations under the Local Government Act 1972, the Localism Act 2011 and the Accounts and Audit Regulations 2015; and under Article 6(1)(e) UK GDPR (performance of a task carried out in the public interest or in the exercise of official authority vested in the Council).

### **Special category data**

Where necessary, special category data (for example, health information or political opinions disclosed in correspondence or declarations) may be processed under Article 9(2)(g) UK GDPR (substantial public interest) and Schedule 1, Part 2, paragraph 6 of the Data Protection Act 2018 (statutory and governmental purposes). Where relevant to

complaints or investigations, Schedule 1, Part 2, paragraph 10 (preventing or detecting unlawful acts) may also apply.

### **Purposes of processing**

Administering and publishing Council meetings, records and decisions

Complying with statutory transparency requirements including registers of interest and allowances

Facilitating communications between councillors, officers and members of the public

Supporting governance, accountability, standards and complaints handling

Ensuring compliance with applicable legislation and codes of conduct

In limited circumstances, where necessary to safeguard Council officers or ensure effective governance, councillor communications may be managed or redirected by oversight officers such as the Monitoring Officer

### **Sources of data**

Personal data is collected directly from councillors, generated through Council records and operations, or received from third parties such as members of the public, regulators, auditors or partner authorities.

### **Recipients of data**

Other councillors and Council officers for official Council business

Calderdale Metropolitan Borough Council when exercising oversight and monitoring functions

Members of the public through publication of statutory information including registers, minutes and allowances

Regulators, auditors and the Information Commissioner's Office where required by law

### **Retention**

Councillor data is retained in accordance with statutory requirements and the Council's Records Management Policy. Examples include registers of interests published and retained for as long as required under the Localism Act 2011), allowances and payment records (retained for six years in line with financial legislation), and minutes and meeting records (permanently archived as public records). Routine correspondence is retained only for as long as necessary for statutory, complaint or governance purposes and is periodically reviewed for secure deletion when no longer required.

### **International transfers**

The Council does not routinely transfer councillor data outside the UK. Where cloud services or suppliers involve international transfers, appropriate safeguards are applied in compliance with UK GDPR.

### **Your rights**

Councillors have the rights of access, rectification, erasure in limited circumstances, restriction of processing and objection where applicable. Where records reflect professional opinions or assessments, a councillor may request that a statement of

their views is added alongside the record. Councillors also have the right to lodge a complaint with the Information Commissioner's Office.

**Automated decision-making**

The Council does not use councillors' personal data for automated decision-making or profiling.

**Contact**

To exercise your rights or for further information, contact the Data Protection Officer at [dpo@theprivacyworx.com](mailto:dpo@theprivacyworx.com). If you remain dissatisfied, you may lodge a complaint with the Information Commissioner's Office at [www.ico.org.uk](http://www.ico.org.uk) or by telephone on 0303 123 1113.