



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

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 controller. If you remain dissatisfied, you may lodge a complaint with the Information Commissioner's Office at www.ico.org.uk or by telephone on 0303 123 1113.