

# PRIVACY NOTICE

## FOR STAFF, COUNCILLORS AND ROLE HOLDERS

**Date adopted:** 10 February 2026

**Review date:** February 2029

### 1. WHO WE ARE

This Privacy Notice is provided by Thornbury Town Council ("the Council"), which is the data controller for your personal data.

The Council's Data Protection Lead is the Chief Executive Officer. Contact details are provided at the end of this notice.

### 2. WHAT PERSONAL DATA IS

Personal data is any information relating to an identified or identifiable living individual. This includes information such as names, contact details, photographs, identification numbers, and information that can be combined to identify an individual.

The Council processes personal data in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

### 3. WHO THIS NOTICE APPLIES TO

This notice applies to:

- Employees and workers
- Councillors
- Volunteers and role holders
- Contractors and agents
- Applicants and former staff, councillors, and role holders

## 4. WHAT DATA WE PROCESS

The personal data the Council processes about you will depend on your role, appointment, or relationship with the Council. The Council processes only personal data that is relevant and necessary to carry out its functions and responsibilities.

This may include, where applicable:

- Contact details and identifiers
- Employment, appointment or engagement information
- Payroll, pension and financial information
- Recruitment, vetting and right-to-work information
- Health, wellbeing, equality and emergency contact information
- Performance, conduct, training, disciplinary and grievance information
- Records relating to use of Council systems, premises, and facilities
- Security and access records, including CCTV where applicable
- Correspondence and communications with the Council.

The Council does not process personal data that is not necessary for the performance of its functions or compliance with its legal obligations.

## 5. WHY WE PROCESS YOUR DATA (PURPOSES)

The Council processes personal data for purposes connected with its statutory functions, governance responsibilities, and management of its workforce and office holders.

These purposes include, where relevant:

- Recruiting, appointing, and engaging staff, councillors, and role holders
- Administering employment, appointments, contracts, and allowances
- Paying salaries, expenses, and pensions
- Meeting legal, regulatory, and audit requirements
- Managing performance, conduct, grievances, and disciplinary matters
- Supporting health, safety, and wellbeing obligations
- Providing training and development
- Ensuring the security of Council systems, information, and premises
- Preventing fraud and misuse of Council resources
- Maintaining records required for democratic and administrative governance
- Communicating with you in connection with your role or engagement

## 6. LAWFUL BASIS FOR PROCESSING

The Council processes personal data under one or more of the lawful bases set out in data protection legislation, depending on the purpose of the processing and the Council's relationship with the individual.

The lawful bases relied upon by the Council include:

- **Legal obligation** – where processing is necessary for the Council to comply with its legal duties, including employment law, taxation, audit, and other statutory requirements.

- **Performance of a contract** – where processing is necessary to enter into, administer, or perform a contract or appointment, including employment contracts, engagement of contractors, and service arrangements.
- **Public task / exercise of official authority** – where processing is necessary for the performance of the Council's statutory functions or the exercise of official authority vested in the Council, including democratic and governance functions.
- **Legitimate interests** – where processing is necessary for the Council's legitimate interests, or those of a third party, and where those interests are not overridden by the rights and freedoms of the individual. This lawful basis is not relied upon where the Council is acting in the performance of its public task.

In limited circumstances, the Council may rely on **consent** to process personal data. Where this applies, consent will be obtained separately, and individuals will be informed of their right to withdraw consent at any time. Withdrawal of consent will not affect the lawfulness of processing carried out before consent was withdrawn.

## 7. SPECIAL CATEGORY AND CRIMINAL DATA

The Council may need to process certain categories of personal data that are afforded additional protection under data protection legislation. This includes information relating to health, equality and diversity, and, where appropriate, information relating to criminal convictions or offences.

The Council will only process such data where it is lawful to do so and where one or more of the conditions set out in Article 9 or Article 10 of the UK GDPR, together with relevant provisions of the Data Protection Act 2018, apply. Appropriate safeguards will be in place at all times.

Special category personal data may be processed for purposes including, where relevant:

- Meeting employment and social security obligations (such as managing sickness absence or occupational health matters)
- Complying with equality and diversity duties
- Safeguarding and protecting individuals
- Ensuring fitness to perform a role or duties
- Establishing, exercising or defending legal claims

The Council will not process special category or criminal conviction data unless it is necessary and proportionate, and access to such data will be restricted to those who have a legitimate need to know.

Where consent is relied upon, this will be obtained separately and individuals will be informed of their right to withdraw consent. However, in many cases the Council relies on statutory or public interest grounds rather than consent.

Criminal conviction and offence data will only be processed where authorised by law and subject to appropriate safeguards.

## 8. SHARING YOUR DATA

We may share personal data with:

- Payroll, pension and HR service providers
- Other public authorities (e.g. HMRC, local authorities)
- Professional advisers
- IT and systems providers
- Law enforcement or regulators where required

Where relevant to recruitment, vetting or appointment, we may share personal data with recruitment agencies, former employers, referees, and appropriate vetting or credit-checking organisations.

All sharing of personal data by the Council is carried out lawfully, fairly and transparently. Personal data is shared only where there is a clear lawful basis for doing so, where the sharing is necessary and proportionate for the intended purpose, and where appropriate safeguards are in place.

Where personal data is shared with third parties acting on the Council's behalf, the Council ensures that appropriate written agreements are in place. Where personal data is shared with other public authorities or bodies acting as independent or joint data controllers, such sharing is carried out in accordance with applicable legal powers and duties.

## 9. HOW LONG WE KEEP YOUR DATA

The Council retains personal data only for as long as is necessary for the purposes for which it was collected, and in accordance with its statutory duties and business needs.

Personal data is retained in line with the Council's Retention Schedule, which sets out the retention periods for different categories of records and information. These periods are determined by reference to legal, regulatory, financial, and operational requirements.

In some cases, the Council is required by law to retain records for a minimum period. In other cases, personal data may be retained for longer where this is necessary to establish, exercise, or defend legal claims, or to comply with audit or accountability requirements.

Once personal data is no longer required, it is securely deleted or destroyed in accordance with the Council's retention and disposal arrangements. The Council takes appropriate steps to ensure that personal data is not retained unnecessarily and is disposed of securely when it is no longer needed.

## 10. YOUR RIGHTS

You have a number of rights in relation to your personal data under the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. These rights apply in different circumstances and may be subject to legal limitations or exemptions.

Your rights include:

- The right to be informed about how your personal data is collected and used. This Privacy Notice is intended to meet that requirement.
- The right of access to personal data held about you (commonly known as a Subject Access Request). This enables you to receive a copy of your personal data and other supplementary information.
- The right to rectification, allowing you to request that inaccurate or incomplete personal data is corrected.

- The right to erasure, in limited circumstances, where personal data is no longer necessary for the purpose for which it was collected, or where its continued processing is not lawful. This right does not apply where the Council is required to retain the data for legal or statutory reasons.
- The right to restrict processing, allowing you to request that the Council limits how it uses your personal data in certain circumstances.
- The right to object to processing, where the Council relies on public task or legitimate interests as the lawful basis for processing, and you have grounds relating to your particular situation.
- The right to data portability, where applicable, allowing you to obtain and reuse certain personal data for your own purposes across different services.
- The right to withdraw consent, where processing is based on consent. This will not affect the lawfulness of processing carried out before consent was withdrawn.

Requests to exercise these rights should be made to the Council's Data Protection Lead. The Council will respond within the statutory timescales and in accordance with its Subject Access Request procedure.

You also have the right to raise a concern or complaint with the Information Commissioner's Office (ICO) if you believe that your personal data has been processed unlawfully.

## 11. DATA SECURITY AND BREACHES

The Council takes the security of personal data seriously and applies appropriate technical and organisational measures to protect personal data against unauthorised or unlawful processing, accidental loss, destruction, or damage.

Access to personal data is restricted to those individuals who have a legitimate business or statutory need to know, and personal data is handled in accordance with the Council's internal policies, including its Data Protection Policy and IT and Security Policy.

The Council has procedures in place to deal with any suspected or actual personal data breach. Where a personal data breach occurs, it will be assessed without undue delay and managed in accordance with the Council's Data Breach Procedure.

Where required by law, the Council will notify the Information Commissioner's Office and affected individuals of a personal data breach, in accordance with UK GDPR requirements.

## 12. TRANSFERS OUTSIDE THE UK

The Council does not routinely transfer personal data outside the United Kingdom.

In limited circumstances, personal data may be accessed or processed outside the UK, for example where Council systems are supported by third-party service providers, or where individuals access publicly available information from overseas.

Where personal data is transferred outside the UK, the Council will ensure that appropriate safeguards are in place to protect personal data, in accordance with data protection legislation. This may include the use of adequacy regulations, approved contractual safeguards, or other lawful mechanisms recognised under the UK GDPR.

The Council will only transfer personal data internationally where it is lawful to do so and where individuals' rights and freedoms are adequately protected.

## 13. CHANGES TO THIS NOTICE

This notice is reviewed periodically and updated where necessary. The latest version will be published on the Council's website.

## 14. CONTACT DETAILS

**Data Controller:** Thornbury Town Council

**Data Protection Lead:** Chief Executive Officer

**Address:** Town Hall, 35 High Street, Thornbury, Bristol, BS35 2AR

**Email:** [clerk@thornburytowncouncil.gov.uk](mailto:clerk@thornburytowncouncil.gov.uk)

You also have the right to complain to the **Information Commissioner's Office:**

[www.ico.org.uk](http://www.ico.org.uk) | 0303 123 1113