



# Wellingborough Town Council

## PRIVACY POLICY

This privacy policy informs the data holder what to expect when Wellingborough Town Council collects their personal information.

### **Privacy Policy**

This privacy notice tells you what to expect when Wellingborough Town Council collects personal information. It applies to information we collect about:

#### **Visitors to our website**

We use a third party, Aubergine to host our website and collect anonymous information about users' activity on the site, for example the number of users viewing pages on the site, to monitor and report on the effectiveness of the site and help us improve it.

#### **Visitors to our app**

We use a third party, At Creative to support our waking trails app and Aubergine for the Town Council app. The apps collect anonymous information about users' activity on the site, for example the number of users accessing the walking trails, to monitor and report on the effectiveness of the app and help us improve it.

#### **People who contact us via social media**

We use a third-party provider, Social Pilot to manage our social media interactions.

If you send us a private or direct message via social media the message will be stored by Social Pilot for a maximum of three months. It will not be shared with any other organisations.

## **Calling our offices**

When you call our office, we collect Calling Line Identification (CLI) or caller display information. This information is not shared with any other organisations.

### **People who email us**

Any email sent to us, including any attachments, may be monitored and used by us for reasons of security and for monitoring compliance with office policy. Email monitoring or blocking software may also be used. Please be aware that you have a responsibility to ensure that any email you send to us is within the bounds of the law.

### **People who make a complaint to us**

When we receive a complaint from a person, we make up a file containing the details of the complaint. This normally contains the identity of the complainant and any other individuals involved in the complaint.

We will only use the personal information we collect to process the complaint and to check on the level of service we provide. We do compile and publish statistics showing information like the number of complaints we receive, but not in a form which identifies anyone.

We usually have to disclose the complainant's identity to whoever the complaint is about. This is inevitable where, for example, the accuracy of a person's record is in dispute. If a complainant doesn't want information identifying him or her to be disclosed, we will try to respect that. However, it may not be possible to handle a complaint on an anonymous basis.

We will keep personal information contained in complaint files in line with our retention policy. This means that information relating to a complaint will be retained for two years from closure. It will be retained in a secure environment and access to it will be restricted according to the 'need to know' principle.

Similarly, where enquiries are submitted to us, we will only use the information supplied to us to deal with the enquiry and any subsequent issues and to check on the level of service we provide.

When we take enforcement action against someone, we may publish the identity of the defendant. Usually we do not, identify any complainants unless the details have already been made public.

### **People who use the Town Council services**

The Town Council offers various services to the public. We use a third party to deal with some requests, but they are only allowed to use the information for these purposes.

We have to hold the details of the people who have requested the service in order to provide it. However, we only use these details to provide the service the person has

requested and for other closely related purposes. For example, we might use information about people who have an allotment plot to see if they would be interested in being an allotment representative or assisting with events on the allotment site. When people subscribe to our services, they can cancel their subscription at any time and are given an easy way of doing this.

### **Individuals applying for a grant**

When individuals apply for a grant under the Town Council's Grants Scheme, they submit their information in an Application Form; provide details of their proposal and an outline of the potential cost. Those who are awarded grants are asked to provide progress reports, a final report and final expenses. Any personal information that is provided in the application are used only for the purpose of reviewing the grant application and the ongoing administration and management of any grants that are awarded. We will also publish information about projects on our own website, including the amount of grant awarded and the recipient of the grant.

### **Job applicants, current and former Officers**

When individuals apply to work at the Town Council, we will only use the information they supply to us to process their application and to monitor recruitment statistics. Where we want to disclose information to a third party, for example where we want to take up a reference or obtain a 'disclosure' from the Criminal Records Bureau we will not do so without informing them beforehand unless the disclosure is required by law.

Personal information about unsuccessful candidates will be held for 12 months after the recruitment exercise has been completed, it will then be destroyed or deleted.

Once a person has taken up employment with the Town Council, we will compile a file relating to their employment. The information contained in this will be kept secure and will only be used for purposes directly relevant to that person's employment. Once their employment with Town Council has ended, we will retain the file in accordance with the requirements of our retention schedule and then delete it.

### **Complaints or queries**

Wellingborough Town Council tries to meet the highest standards when collecting and using personal information. For this reason, we take any complaints we receive about this very seriously. We encourage people to bring it to our attention if they think that our collection or use of information is unfair, misleading or inappropriate. We would also welcome any suggestions for improving our procedures.

This privacy notice was drafted with brevity and clarity in mind. It does not provide exhaustive detail of all aspects of Town Council's collection and use of personal information. However, we are happy to provide any additional information or explanation needed. Any requests for this should be sent to the address below.

## **Access to personal information**

The Town Council tries to be as open as it can be in terms of giving people access to their personal information. Individuals can find out if we hold any personal information by making a 'subject access request' under the Data Protection Act 2018 and or General Data Protection Regulation 2018. If we do hold information about you, we will:

give you a description of it;

- tell you why we are holding it;
- tell you who it could be disclosed to; and
- let you have a copy of the information in an intelligible form.

To make a request to the Town Council for any personal information you need to put the request in writing addressing it Town Clerk, to the address provided below.

If you agree, we will try to deal with your request informally, for example by providing you with the specific information you need over the telephone. If we do hold information about you, you can ask us to correct any mistakes, or request your information is deleted by, contacting the Town Clerk.

## **Disclosure of personal information**

In many circumstances we will not disclose personal data without consent.

You can also get further information on:

- agreements we have with other organisations for sharing information;
- circumstances where we can pass on personal data without consent for example, to prevent and detect crime and to produce anonymised statistics;
- our instructions to officer on how to collect, use and delete personal data; and
- how we check that the information we hold is accurate and up to date.

## **How to contact us**

If you want to request information about our privacy policy, you can [email us](mailto:clerk@wellingboroughtowncouncil.gov.uk) at [clerk@wellingboroughtowncouncil.gov.uk](mailto:clerk@wellingboroughtowncouncil.gov.uk)