

Privacy Notice

For Staff, Councillors & Role Holders

Policy and Finance Committee Approved: July 2023
Last reviewed: July 2026
Due for next Review: July 2029

1. Who this notice applies to

This notice applies to current and former:

- employees
- workers
- agency staff
- volunteers
- contractors
- councillors
- other role holders
- applicants and candidates for any of these roles

For the purposes of this notice, “staff” includes all of the above unless the context says otherwise.

2. Who we are

Fleet Town Council is the data controller for the personal data covered by this notice. This means we decide how and why your personal data is used.

3. What is personal data?

Personal data is any information relating to an identified or identifiable living individual. This may include names, contact details, photographs, video, online identifiers and other information which can identify you directly or indirectly.

Some information is classed as **special category data**, such as health information, racial or ethnic origin, religious or philosophical beliefs, political opinions, trade union membership, genetic data, biometric data, sex life or sexual orientation. Personal data relating to criminal convictions and offences is also subject to additional legal protection.

4. What personal data we process

Depending on your role, we may process:

- name, title, photographs and images
- address, telephone number and email address
- date of birth, nationality and emergency contact details
- recruitment information, references, CVs and right to work documents
- job title, role description, committee memberships and appointment details
- payroll, tax, National Insurance and pension information
- bank account and expense details
- training, qualifications and professional memberships
- performance, conduct, grievance and disciplinary records
- sickness absence and occupational health information
- equalities monitoring information

- IT, system and access logs
- CCTV images and recordings where applicable
- declarations of interest and other governance records for councillors and role holders
- any information you choose to provide to us in connection with your role

5. Why we use your personal data

We use your personal data to:

- recruit, appoint and administer roles
- manage pay, expenses, taxation and pensions
- check eligibility to work and carry out pre-employment checks where required
- manage contracts, appointments and duties
- support councillors and role holders in carrying out their functions
- maintain records, accounts, audit trails and governance documentation
- manage attendance, performance, conduct, capability, grievances and complaints
- provide training and development
- manage sickness absence, health and safety, and workplace adjustments
- protect Council assets, staff, councillors, visitors and systems
- operate IT systems, cybersecurity measures and access controls
- meet legal and regulatory obligations
- prevent and detect fraud or misconduct
- process equalities monitoring data
- provide references where appropriate and lawful
- administer declarations of interest and related governance requirements

6. Our lawful bases for processing

We will only process your personal data where the law allows us to do so. Depending on the purpose, we may rely on one or more of the following lawful bases under UK GDPR:

- **performance of a contract**
- **legal obligation**
- **public task**
- **legitimate interests** where appropriate and where your rights do not override those interests
- **consent** where no other lawful basis applies and you have freely given clear consent
- **vital interests** in very limited circumstances

7. Special category and criminal offence data

Where we process special category data, we will identify both:

1. a lawful basis under Article 6 of UK GDPR, and
2. a separate condition for processing under Article 9 of UK GDPR.

We may process special category data, for example, to:

- administer sickness absence and occupational health matters
- meet employment, social security and social protection obligations
- carry out equality monitoring
- make reasonable adjustments
- protect your health and safety
- support pension administration or other statutory functions

Where we process criminal offence data, we will do so only where the law allows and with appropriate safeguards.

8. Sharing your personal data

We may share your personal data, where necessary and lawful, with:

- HM Revenue & Customs

- pension providers
- payroll providers
- occupational health providers
- recruitment agencies
- DBS checking providers
- IT and software suppliers
- insurers and professional advisers
- external auditors
- other local authorities or public bodies
- contractors and agents acting on our behalf
- law enforcement bodies and regulators
- bodies involved in CCTV operation or monitoring, where applicable

Where organisations process data for their own purposes, they are separate controllers. Where we work together for a shared purpose, we may be joint controllers.

9. International transfers

We do not normally transfer staff or councillor personal data outside the UK. If we do so, we will ensure appropriate safeguards are in place in accordance with UK data protection law.

10. How long we keep your data

We keep personal data only for as long as necessary for the purpose it was collected for, including legal, accounting, audit and governance requirements.

Retention periods vary depending on the type of record. Some records must be kept for statutory reasons, while others may be destroyed sooner when no longer needed.

11. Your responsibilities

You are responsible for keeping your personal data accurate and up to date, and for telling us if your details change.

12. Your rights

You have the right to:

- be informed about how your data is used;
- access your personal data;
- have inaccurate data corrected;
- ask us to erase your data in some circumstances;
- ask us to restrict how we use your data in some circumstances;
- object to certain types of processing;
- withdraw consent where consent is the lawful basis;
- request data portability in limited circumstances;
- complain to the Information Commissioner's Office (ICO).

We may need to verify your identity before responding. We will usually respond within one month, subject to the legal rules that apply to your request.

13. Complaints

If you are unhappy with how we handle your personal data, please contact us first so we can try to resolve the issue.

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

14. Further processing

If we need to use your personal data for a new purpose not covered by this notice, we will provide you with updated privacy information where required by law.

15. Changes to this notice

We keep this notice under review and will publish any updates on our website.

16. Contact us

If you have any questions about this notice or wish to exercise your rights, contact:

Fleet Town Council
The Harlington, 236 Fleet Road, Fleet, Hampshire, GU51 4BY
Tel: 01252 625246
Email: info@fleet-tc.gov.uk