Redruth Town Council
Public Data Protection Policy

Updated October 2026

Document Controls	
Owner:	Data Protection Officer
Reviewed by:	Full Council

Date	**Initials**	**Revisions made**
October 2026	Chairman – Redruth Town Council	FINAL

If you have any queries or suggested amendments to this document, please contact the Owner named above. Please archive all historic versions of this notice for audit

THIS PUBLIC POLICY EXPLAINS REDRUTH TOWN COUNCIL'S APPROACH TO PROTECTING PERSONAL DATA AND SIGNPOSTS MEMBERS OF THE PUBLIC TO INFORMATION, POLICIES AND PROCEDURES THAT MAY BE RELEVANT TO THEM.

1. OUR COMMITMENT

1.1 We will handle personal data lawfully, fairly and transparently; collect only what is needed; keep it accurate and no longer than necessary; protect it appropriately; and respect individuals' information rights.

2. HOW WE USE PERSONAL DATA

2.1 The Council processes personal data to deliver public services, administer its functions, communicate with residents and service users, manage contracts and employment, meet legal duties, support safeguarding, and protect public funds and Council systems. The relevant privacy notice explains the purpose, lawful basis, recipients and retention arrangements for each activity.

2.2 When the Council handles personal information, it aims to comply with the 'data protection principles', including:

2.2.1 to use personal data lawfully, fairly and transparently;

2.2.2 collect personal data for clear and legitimate purposes;

2.2.3 use only the information that is necessary;

2.2.4 keep personal data accurate and up to date;

2.2.5 retain personal data only for as long as needed;

2.2.6 protect personal data with appropriate security measures; and

2.2.7 respect people's information rights and remain accountable for compliance.

2.3 The Council explains how and why it uses personal information through clear and accessible privacy notices. Where personal data is collected directly from an individual, the Council will provide the applicable privacy information when the data is obtained, unless the individual already has that information. When information comes from another source, the Council will provide the required information as soon as possible and check that the information was collected lawfully for the intended use.

2.4 Consent is one possible lawful basis for using personal information, but the Council will use it only where it is appropriate. Consent must be freely given, specific, informed and unambiguous, and shown by a clear positive action. Silence, inactivity, pre-ticked boxes or consent bundled with unrelated matters are not valid consent. Where the Council relies on consent, it keeps a record of it, explains how the information will be used and makes it easy to withdraw consent. Withdrawal will be acted on promptly. The Council will not rely on consent where another lawful basis is more appropriate. This may include safeguarding disclosures where sharing is necessary and proportionate and an appropriate lawful basis, and any additional condition required for special category or criminal offence data, has been identified.

3. WHERE TO FIND MORE INFORMATION

3.1 Redruth Town Council has adopted the following policies that are available for public review:

3.1.1 **Privacy notices:** explain how the Council uses personal data for particular services, functions and activities. The Council maintains a layered privacy framework comprising a general public privacy notice and, where appropriate, service-specific privacy information

3.1.2 **Data Subject Rights and Information Access Policy:** explains how to exercise data protection rights or make an information request.

3.1.3 **Data Retention Policy:** explains how the Council determines how long records should be retained and how records should be securely disposed of when they are no longer required.

3.1.4 **Safeguarding Policy:** explains how concerns about children or adults at risk are handled.

3.1.5 **Breach and Escalation Policy:** explains how the Council responds to an actual or suspected data breach.

3.1.6 **Member Information Access Policy:** explains how Council Members access information from the Council.

3.1.7 **Complaints procedure**: explains how to raise a concern about the Council's handling of information and can be found within the Data Subject Rights and Information Access Policy.

3.2 The Council also maintains a range of operational and internal governance policies, including policies relating to social media, use of personal devices (BYOD), mobile phone use, remote working and internal data protection procedures. The Council also has a Member, Officer, Volunteer and Contractor Privacy Notice supplied at the point of engagement (and updates throughout the relationship). These policies are primarily intended for internal operational

purposes and are not routinely published. Requests for access to Council-held information are considered in accordance with the Data Subject Rights and Information Access Policy and applicable information access legislation.

3.3 Redruth Town Council is registered with the Information Commissioner's Office under Register Entry No. Z7191792. Our Data Protection Officer (**DPO**): Town Clerk.

4. YOUR RIGHTS

4.1 Depending on the circumstances, you may have rights to access, correct, erase or restrict the use of your personal data; object to processing; receive certain information in a portable format; or withdraw consent where consent is relied upon. Some rights are subject to legal conditions and exemptions.

4.2 To exercise a right, make an information request or raise a concern, please review the Data Subject Rights and Information Access Policy or contact the Town Clerk or Data Protection Officer using the contact details published by Redruth Town Council.

5. FREEDOM OF INFORMATION AND ENVIRONMENTAL INFORMATION

5.1 The Freedom of Information Act 2000 (**FOIA**) and the Environmental Information Regulations 2004 (**EIR**) give the public rights to request recorded information held by, or on behalf of, the Council. EIR applies specifically to environmental information, while FOIA applies to other recorded information.

5.2 The Council will consider each request under the appropriate legislation. Information may be withheld where a statutory exemption or exception applies, and some requests may be subject to fees or other procedural requirements.

5.3 Details of how to make a request, applicable timescales, review rights and how FOIA or EIR requests interact with personal-data requests are set out in the Council's Data Subject Rights and Information Access Policy.

6. TRANSPARENCY SCHEME

6.1 The Council's Transparency Scheme explains the information it makes available proactively, without the need for a specific request. This supports openness and helps members of the public understand the Council's decisions, spending, governance and activities.

6.2 The scheme signposts the categories of information published, where that information can be found and, where applicable, whether a charge may be made. Information will be kept under review and updated in accordance with applicable transparency requirements.

6.3 If information is not available through the Transparency Scheme or the Council's other published information, it may be requested under FOIA or EIR (see above). Statutory exemptions or exceptions may apply.

7. SHARING AND SECURITY

7.1 We may share personal data where this is necessary and lawful, including with service providers, public authorities, safeguarding bodies and other organisations involved in delivering services. We require appropriate safeguards and take proportionate technical and organisational measures to protect personal data.

7.2 Personal information may be transferred or accessed outside the UK only where the legal requirements for international transfers are met. This may include UK adequacy regulations, approved safeguards, explicit consent after risks have been explained, or another limited legal exception. The use of overseas-hosted software or online services can amount to an international transfer, so proposed cross-border transfers and new technology should be referred to the Data Protection Officer.

8. LIBRARY SERVICES

8.1 For certain library services, Redruth Town Council processes personal data on behalf of Cornwall Council. In other cases, the Council may be responsible for personal data processed in connection with services that it administers itself. The applicable privacy information providing within our published Privacy Notices will identify the organisation responsible for the relevant processing and explain where requests or concerns should be directed.

9. CONCERNS AND COMPLAINTS

9.1 Please raise data protection concerns with the Council in the first instance so that they can be considered promptly. This procedure is set out within the Data Subject Rights and Information Access Policy under "Complaints". You may also complain to the Information Commissioner's Office.

10. REVIEW

10.1 This policy will be reviewed every two years, or earlier where required by changes in law, guidance or Council services.