

Privacy Notice - Appendix 1

West Lindsey District Council (“the Council”) is registered as a data controller with the Information Commissioner’s Office (registration number: Z5460805).

If you have any questions about how we handle your personal data then you can contact us by writing to:

Data Protection Officer
West Lindsey District Council
Guildhall
Marshall’s Yard
Gainsborough
DN21 2NA

email: dpo@west-lindsey.gov.uk

How we use your information

This privacy notice tells you what to expect when West Lindsey District Council (“the Council”) collects personal information. It applies to information we collect about:

- visitors to our websites
- people who register for an on-line account
- people who register for and use our services
- people who are referred to us by other persons, agencies, organisations
- people who contact us with an enquiry or complaint
- job applicants and our current and former employees
- people who participate in publicity for the Council
- people who are recorded on CCTV operated by the Council.

What is personal data?

Personal data means any data which can be used to identify an individual (such as name and address) and any information that relates to that individual from which they can be identified (for instance, details of the services provided to a particular individual). The following types of personal data may be used:

- personal details
- family details
- employment and education details
- student and pupil records
- housing needs
- lifestyle and social circumstances
- visual images, personal appearance and behaviour
- physical or mental health details
- racial or ethnic origin

- data concerning a natural person's sex life or sexual orientation
- trade union membership
- political affiliation
- political opinions
- offences (including alleged offences)
- religious or other beliefs of a similar nature
- criminal proceedings, outcomes and sentences
- goods and services
- financial details
- CCTV footage
- licenses or permits held
- business activities
- case file information

What do we use personal data for?

We use personal data for the following purposes:

- promoting the services we provide
- the provision of social services
- provision of education
- licensing and regulatory activities
- the provision of all commercial services including the administration and enforcement of parking regulations and restrictions
- the provision of all non-commercial activities including refuse collections from residential properties
- supporting and managing our employees
- marketing our local tourism
- carrying out health and public awareness campaigns
- managing our property
- providing leisure and cultural services
- maintaining our own accounts and records
- carrying out surveys
- administering the assessment and collection of taxes and other revenue including benefits and grants
- local fraud initiatives
- data matching under local and national fraud initiatives
- crime prevention and prosecution offenders including the use of CCTV
- corporate administration and all activities we are required to carry out as a data controller and public authority
- undertaking research
- internal financial support and corporate functions
- managing archived records for historical and research reasons

We will use personal data where one or more of the following criteria apply:

- we have your (or your appointed representatives) consent. For example, you may have indicated your consent on a paper form or on-line form on our web site

- where we have a contract with you or you have asked us to process your data prior to entering onto a contract
- where we are under a legal obligation that requires us to process your personal data
- we are protecting your vital interests, or those of other persons. For example, sharing details of your care record with a medical professional in an emergency
- where the Council is carrying out a public function, for instance, performing its safeguarding role, planning or waste services function
- where we have a legitimate need to use information for a specific purpose that does not unjustifiably infringe on your rights or freedoms
- it is required for the prevention or detection of crime
- it is required for obtaining legal advice or for the purposes of legal proceedings
- it is used for research purposes.

Who may we share personal data with?

To ensure that the Council provides you with an efficient and effective service we will sometimes need to share your information with other parties that support the delivery of the service you may receive or to support the carrying out of our functions.

We may provide personal data to (or receive personal data from):

- ACIS
- BHSF Ltd
- British Library
- Building Demolition consultees
- Charitable Giving
- Local Authorities
- Court Service
- Credit Reference Agencies
- Credit Union
- DCLG
- DFG Contractors
- DVLA
- DWP
- Edited Electoral Register Purchasers
- Election Candidates
- Election Staff
- Elite Pest Management
- Enforcement Agents
- Environment Agency
- Experian
- External Investigation (members code of conduct complaint)
- Fire Service
- Framework (Accommodation Managers)
- Gambling Commission
- Greenborough Management Ltd
- Health and Safety Executive

- HM Customs and Excise
- Home Office
- Homesafe
- Jury Service
- KPMG External Audit
- Landlords (Incl. previous landlords)
- LCHS (Mental Health)
- Legal Services
- Lincolnshire Police
- Lincolnshire Safeguarding Children's Board
- Lincs Homefinder partners
- Mailchimp
- MARAC Partners
- Media Outlets (press releases)
- MODUS system users
- MPs
- Other Local Authorities
- P3
- Parish Clerks
- Physiotherapist (Mulberry Health)
- Planning application consultees
- Political Parties
- Property Owners/Mortgage Holders (empty homes)
- Public Health
- Public-I
- Registered Housing Providers
- Registered Landlords
- Scarborough Tourism Economic Assessment Monitor (STEAM)
- Shopwatch partners
- Social Media platforms
- Solicitors (various, inc. John Barkers, NP Solicitors)
- Statutory Planning Consultees
- Trading Standards
- Unison
- Valuation Office
- Veterinary
- Virtual Mail Room (VMR)
- Vulnerable Adult Panel members
- WellWork
- WY Pension Fund

Will personal data ever be transferred overseas?

In some circumstances we may need to transfer personal data (including sensitive personal data (also known as Special Category data)) to other organisations who are based overseas, including countries which are outside the European Economic Area. When doing so, we will ensure that procedures and technologies are put in place to maintain the security of all personal data which is processed overseas.

Where transferring to a country that has not be approved by the European Commission (EC) as providing adequate protection of individuals' rights, one or more of the following safeguards may be relied upon:

- use of EC approved contractual terms to protect individuals' rights
- transfers to US companies that are members of the EU-US Privacy Shield and have agreed to protect individuals' rights
- companies that have EC approved internal rules to protect individuals' rights.

How long do we keep your personal information?

We maintain information in accordance with our Retention and Disposal Schedule which specifies timescales for how long we hold your information. The law may specify the minimum amount of time we have to retain certain information. Please contact the Council for more information.

What if I have any concerns about the use of personal data or its accuracy?

If you have concerns about the use of your personal data by West Lindsey District Council, or its accuracy, you may contact us at the address above.

How do we keep your information secure?

We will take appropriate steps to make sure we hold records about you in a secure way, including:

- all employees who have access to your personal data or are associated with the handling of that data are obliged to respect the confidentiality of your personal data
- we will have put in place procedures and technologies to maintain the security of all personal data from the point of collection to the point of destruction.

What rights do you have in relation to your personal data?

You have a number of rights in relation to your personal data. Please note that not all rights are automatic and some may not be available in certain circumstances:

- **Right to find out about personal data we hold and ask for a copy of it (data subject access request)** - you can ask us whether we hold your personal data and you can a request a copy of the information we hold.
- **Right to withdraw your consent** – if you have provided us with consent to use your data, for instance, for marketing purposes, you have the right to withdraw your consent to stop the further use of your data for that purpose. This right may

not be available where use of your data is not reliant on obtaining consent, for instance, compliance with a legal obligation.

- **Right to object to use of your information which is likely to cause substantial damage or distress** – you may object in writing to us explaining why such use of your data is likely to cause you damage or distress and what should be done to prevent this. This right is not automatic and the use of your personal data for purposes you disagree with may be justified in certain cases even if it causes you some damage or distress.
- **Right to refer to the Information Commissioner's Office** - for independent advice about data protection, privacy and data sharing issues, or if you are still dissatisfied with how the Council have handled a complaint about use of your data, you can write to the Information Commissioner's Office at the following address:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Or email: casework@ico.org.uk.

Visitors to our websites

When someone visits the following websites:

- west-lindsey.gov.uk,
- planning.west-lindsey.gov.uk,
- licensing.west-lindsey.gov.uk,
- democracy.west-lindsey.gov.uk,
- maps.west-lindsey.gov.uk,
- west-lindsey-self.achieveservice.com,
- west-lindseycalc.entitledto.co.uk,
- trinityarts.co.uk,

we collect standard internet log information and details of visitor behaviour patterns. We do this to find out things such as the number of visitors to the various parts of the site. We collect this information in a way which does not identify anyone and we do not make any attempt to find out the identities of those visiting our website. We will not associate any data gathered from this site with any personally identifying information from any source. If we do want to collect personally identifiable information through our website, we will be up front about this. We will make it clear when we collect personal information and will explain what we intend to do with it.

Please note that if you make a comment (called 'a representation') on a specific planning application via the website, both your comments and contact details will be made public as part of the planning process. Similarly, representations about Licensing

Applications made under the Licensing Act 2003 will be made public together with name and contact details.

www.west-lindsey.gov.uk may also use, on some pages, an Analysis and Feedback tool. We do not collect through the tool or transfer to it any Personal Identifiable Information.

The tool may collect and process information which is automatically and passively collected, whilst you navigate through and interact with the content on a tool-enabled site, together with information on your device or computer (such as cookies).

The sole purpose of passively collecting your information is to improve your experience when using the tool-enabled site.

Through the code embedded on a tool-enabled site, the information collected and processed includes:

Device-specific data

The following information may be collected related to your device and browser:

- device's IP address (captured and stored in an anonymized format);
- device screen resolution;
- device type (unique device identifiers), operating system, and browser type;
- geographic location (country only); and
- preferred language used to display the tool-enabled site.

User interactions

- Mouse events (movements, location and clicks)
- Keypresses

Log data

For a sampling of visitors, the tool servers automatically record information which is collected from Customer Websites and the tool site. This data includes:

- referring URL and domain;
- pages visited;
- geographic location (country only);
- preferred language used to display the webpage;
- date and time when website pages were accessed.

The tool uses a variety of services hosted by third parties, such as Google Analytics and Optimizely. These services may collect information sent by your browser as part of a web page request, such as cookies or your IP request. For information on how Google Analytics and Optimizely collect and use your information, please refer to their privacy policies. Keystrokes from password fields and fields marked as “sensitive” are never recorded or sent over the network.

Use of cookies by the Council

You can read more about how we use cookies, and how to delete or reject them, on our [Cookies page](#).

Search engine

Search queries and results are logged anonymously to help us improve our website and search functionality. No user-specific data is collected by either the Council or any third party.

Online reporting tools

We collect information volunteered by members of the public by surveys and forms. We only use the personal data we collect to process the information and/or to check the level of service we provide.

Security and performance

The Council's website is hosted by EasySite. EasySite processes the IP addresses of visitors to help maintain the security and performance of the website.

People who telephone us

When you call the Council we collect Calling Line Identification (CLI) information. We use this information to help improve its efficiency and effectiveness.

We also offer a translation service provided by a third party company for customers when English is not their first language. The company that provides this service does not retain any information from the calls or record them.

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 make sure that any email you send to us is within the bounds of the law.

People who use Council services

We collect personal information because you have asked the Council to provide a Service (which we provide as part of our public duties); and we use that information to process and deliver the service to you. If you chose not to provide this information we will not be able to provide the service you asked for.

We will also store that information in our records for use in the future should you contact us for other services. We only collect information which is relevant to providing Council services to you; and for communicating with you regarding those services.

We will share information such as your name, address and contact details across the Council. If we have collected more specific information, or documentation relevant to a particular service you have requested, we may also share that information to other departments in the Council when that information is needed to assess and provide other services.

We do this, to reduce the amount of information you will need to provide to us when you ask for additional services; and to help us locate information about your services easily and quickly to respond to your queries.

We will share your information with internal Council departments and with partner organisations which deliver services on our behalf for the following purposes:

1. To provide information and answer any queries that you have.
2. To assess, process and provide you with services that you requested
3. To send you information about the services and topics you have asked to be kept informed about.
4. To seek feedback on the services or information you have been provided.

We will not share your information with any other third-party organisation or transfer it outside the European Union without your consent.

People who make a complaint about someone else to us

When we receive a complaint from a person about someone else (e.g. complaints regarding anti-social behaviour, excessive noise, contraventions of planning regulations etc.) 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, assist with enforcement, 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 will never disclose the complainant's identity to whoever the complaint is about unless the complainant gives us their explicit consent or we are legally required to. We will only share personal information collected about the complaint with relevant agencies and bodies in line with our data sharing agreements.

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 six 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.

People who make a complaint about us

When we receive a complaint about us 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 the service or individual(s) that 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 six 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.

If a complaint is escalated to the Local Government Ombudsman we may share information regarding your complaint with them to aid their investigation. Any information that is made available to the Local Government Ombudsman will not be shared with any wider audiences.

Job applicants, current and former Council employees

When individuals apply to work at the 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 Disclosure and Barring Service 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 one year plus the current year after the recruitment exercise has been completed, it will then be destroyed or deleted. We retain de-personalised statistical information about applicants to help inform our recruitment activities, but no individuals are identifiable from that data.

Once a person has taken up employment with the Council, we will compile a file relating to their employment. We will process data about them for a variety of purposes including all aspects of the administration of their employment. The information contained in the file will be kept secure and will only be used for purposes directly relevant to that person's employment. We will not share data with third parties except where the employee has asked us to or where the Council is required to by law. Once their employment with the Council has ended, we will retain the file in accordance with the requirements of our retention schedule and then delete it.

Use of CCTV

The Council operates monitored CCTV systems in some of our locations used by members of the public. The purpose of this CCTV is for the safety of the public and staff at these locations and to prevent and detect crime. In locations that have CCTV there are signs displayed notifying you that CCTV is in operation.

We will only disclose CCTV images to third parties for the purposes as stated above. CCTV images will not be released to the media for entertainment purposes or places on the internet.

CCTV images will be monitored, used and retained in accordance with the council's CCTV Code of Practice. You can view the [Council's CCTV Code of Practice online](#).

You have the right to see CCTV images of yourself and be provided with a copy subject to certain criteria. Please visit our [CCTV page](#) to learn more about completing a Data Subject Access Request.

The Council also operates public space and private customer CCTV solutions. You can find out more about these services on our [CCTV page](#).

Access to personal information

The 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 'data subject access request' under Data Protection law. 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 council for any personal information we may hold about you, you need to put the request in writing either by emailing it to our Freedom of Information Department at foi@west-lindsey.gov.uk, or by writing to:

The Freedom of Information Dept.
West Lindsey District Council
Guildhall
Marshall's Yard
Gainsborough
DN21 2NA

If we do hold information about you, you can ask us to correct any mistakes by, once again, contacting the Freedom of Information Department.

Disclosure of personal information

In many circumstances we will not disclose personal data without consent. However, when we investigate a complaint, for example, we will need to share personal information with the department concerned and with other relevant bodies.

Data matching for the prevention and detection of fraud and crime

West Lindsey District Council is required by law to protect the public funds it administers. We may share information provided to us with other bodies responsible for; auditing, or administering public funds, or where undertaking a public function, in order to prevent and detect fraud.

The Cabinet Office is responsible for carrying out data matching exercises.

Data matching involves comparing computer records held by one body against other computer records held by the same or another body to see how far they match. This is usually personal information. Computerised data matching allows potentially fraudulent claims and payments to be identified. Where a match is found it may indicate that there is an inconsistency which requires further investigation. No assumption can be made as to whether there is fraud, error or other explanation until an investigation is carried out.

We participate in the Cabinet Office's National Fraud Initiative: a data matching exercise to assist in the prevention and detection of fraud. We are required to provide particular sets of data to the Minister for the Cabinet Office for matching for each exercise, as detailed [here](#).

The use of data by the Cabinet Office in a data matching exercise is carried out with statutory authority under Part 6 of the Local Audit and Accountability Act 2014. It does not require the consent of the individuals concerned under the Data Protection Act 1998.

Data matching by the Cabinet Office is subject to a [Code of Practice](#).

Complaints or queries about our collection of personal information

The 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.

Links to other websites

This privacy notice does not cover the links within this site linking to other websites. We encourage you to read the privacy statements on the other websites you visit.

Changes to this privacy notice

We keep our privacy notice under regular review. This privacy notice was last updated on [TBD – date of adoption by CP&R].