

## Data Protection Policy

Document Overview			
This data protection policy ensures that Kirklees Council: <ul style="list-style-type: none"> <li>• Complies with data protection law and follows good practice</li> <li>• Protects the rights of staff, citizens and partners</li> <li>• Is open about how it stores and processes the data about individuals</li> <li>• Protects itself from the risks of a data breach</li> </ul>			
Intended Audience	All Kirklees employees, Elected Members (Councillors), volunteers and organisations working on behalf of Kirklees		
Linked Policy	<a href="#">Information Governance Policy</a> <a href="#">Information Security Policy</a> <a href="#">Information Sharing and Processing Policy</a> <a href="#">Records Management Policy</a> <a href="#">Licensing the Reuse of Council Information Policy</a>		
Revision History			
Version	Author	Reason for issue	Date
3.0	Katy Deacon	Reviewed Policy	11/05/2018
Date of next revision	May 2019		

### Policy Scope

This policy applies to

- all substantive and temporary employees of Kirklees Council
- any individual including contractors, volunteers and others who work on behalf of the Council
- all work experience and other students
- Councillors

This policy outlines the behaviours and responsibilities expected in order to ensure the council continues to fulfil its obligations under the General Data Protection Regulation, the Data Protection Act 2018 and their related and all subsequent Data Protection legislation.

### Policy Statement

All Kirklees employees, Councillors, volunteers and organisations working on behalf of Kirklees are committed to:

1. ensuring that we comply with the data protection principles, as listed within the current Data Protection legislation
2. meeting our legal obligations as laid down by the current Data Protection legislation
3. ensuring that data is collected and used fairly and lawfully
4. processing personal data only in order to meet our operational needs or fulfil legal requirements
5. taking steps to ensure that personal data is up to date and accurate
6. establishing and enacting appropriate retention periods for personal data
7. ensuring that data subjects' rights are appropriately exercised
8. providing adequate security measures to protect personal data
9. ensuring that all staff are made aware of good practice in data protection

10. providing adequate training for all staff responsible for personal data
11. ensuring that everyone handling personal data knows where to find further guidance
12. ensuring that queries about data protection, internal and external to the organisation, are dealt with effectively and promptly
13. regularly reviewing data protection procedures and guidelines within the organisation

### **Roles and Accountability**

The Council's Directors have responsibility for:

- ensuring the Authority's compliance with the current Data Protection legislation
- assigning responsibilities for adherence to the Authority's policies and procedures
- advising Councillors on all matters relating to Data Protection within the Authority
- ensuring that complaints from the public or from the Information Commissioner's Office are dealt with promptly and appropriately.

The Data Protection Officer is responsible for ensuring that:

- the Executive team is updated about data protection responsibilities, risks and issues
- all data protection procedures and related policies are reviewed in line with an agreed schedule
- data protection training and advice is arranged for the people covered by this policy
- data protection queries are properly and adequately handled on behalf of the Council
- requests from individuals exercising their data protection rights are appropriately dealt with
- there are adequate contracts or agreements in place for any arrangements which include the use of personal information with third parties

All staff with line management or supervisory responsibilities are responsible for ensuring that staff under their control who process personal data in any way:

- are made aware of their personal obligations and responsibilities under the current data protection legislation
- receive appropriate training
- are made aware of the Authority's policies and procedures relating to personal information

All individuals who have access to Council data are responsible for:

- complying with the policy and legislation
- ensuring good Information Governance practices are followed at all times
- seeking advice, assistance and training when required

### **Associated Documents/Further Reading**

This policy should be read in conjunction with the [Appendix](#) to all Information Governance related policies, the other policies identified above and the Data Protection Policy guidance note.