**Councillor's policy statement and additional safeguards on processing special category data and personal data relating to criminal convictions and offences**

**Introduction**

With effect from 25 May 2018, data protection law requires controllers who process special category (i.e. sensitive) personal data, (or personal data relating to criminal convictions and offences) under various parts of the Data Protection Act 2018 to have an "appropriate policy document" in place setting out a number of additional safeguards for this data.

More specifically, the law states that:

"The controller has an appropriate policy document in place in relation to the processing of personal data… if the controller has produced a document which—

> (a) explains the controller's procedures for securing compliance with the principles in Article 5 of the GDPR (principles relating to processing of personal data) in connection with the processing of personal data in reliance on the condition in question, and
>
> (b) explains the controller's policies as regards the retention and erasure of personal data processed in reliance on the condition, giving an indication of how long such personal data is likely to be retained."

I, David Turner, Councillor with Glasgow City Council for Ward 20 Baillieston have adopted this policy statement to describe how I comply with the data protection principles.

**Policy Statement**

1: Lawfulness, fairness and transparency:

As an elected member of Glasgow City Council I process personal data in two main ways: firstly, information which I receive from Glasgow City Council (or from arms' length external organisations, or ALEOs, connected to the council) which it is necessary for me to have in order to carry out my functions as a councillor, such as committee reports; and secondly, information which I process in connection with issues raised with me by constituents and others which those people have asked me to intervene with. I am satisfied that I have a legal basis for holding the personal data I hold, and that I also have a valid legal basis for disclosing this personal data to third parties where this happens. In general, I process information about the people who contact me with their own issues with the consent of those individuals, and I process information on other people because it is necessary for me to do so in carrying out my public tasks as an elected member. I have prepared a privacy statement describing how I use people's information which can be found on the website of Glasgow City Council at www.glasgow.gov.uk/DavidTurner.

2: Purpose limitation:

I only process personal information where this is necessary for me to deal with issues which have been raised with me or where the council (or an ALEO) has passed me that information in connection with my duties as an elected member. I use some information for other purposes (such as sending out newsletters) but only with the consent of the individuals concerned.

3: Data minimisation:

I avoid holding any personal information beyond what is necessary for the specific activity I am dealing with.

4: Accuracy:

Where it is appropriate to do so I take reasonable and sensible steps to check that the information I have been given is accurate and, where any inaccuracies are discovered, these are promptly corrected and any third party recipients of the inaccurate data notified of the correction.

5: Storage limitation:

I only keep personal information for the minimum period amount of time necessary. Sometimes this time period is set out in the law, but in most cases it is based on business need. In general, I will keep information relating to constituency queries for the length of time it takes to resolve the issue in question plus five years. I will delete all constituency case files as soon as possible after ceasing to be an elected member of the council unless there is a particular reason to retain specific information beyond this period.

6: Integrity and confidentiality:

I hold personal information on devices, software and networks supplied by Glasgow City Council. The Council has ensured that these devices etc. are encrypted and suitably protected from malicious software and unauthorised access. Information is only accessed by myself or (when strictly necessary) by support staff acting on my behalf. These support staff are appointed in terms of written agreements ensuring they also ensure the integrity and confidentiality of this information and will not access or disclose this information except on my instructions.