

Cheltenham, Gloucester and Tewkesbury Strategic and Local Plan (SLP) – Photographs and recordings at events and meeting

PRIVACY NOTICE

This Privacy Notice provides you with information about what we do with your personal data (namely your image). The provisions of this Privacy Notice apply to personal data collected by the Councils at SLP meetings and public events.

Why we collect information about you?

1. The SLP is a strategic level development plan document that is being prepared jointly by Cheltenham Borough Council, Gloucester City Council and Tewkesbury Borough Council.
2. The councils have agreed that Tewkesbury Borough Council will act as the lead authority for the SLP and collects personal data on behalf of the three councils to enable them to capture evidence of plan making activities, publicise planning policy events, report the outcomes of planning policy events, create promotional material for planning policy events.

What information do we collect about you?

1. If you attend an in-person drop-in event or public meetings with regard to planning policy activities, your image may be captured in photographs or on film.
2. If you participate in an online consultation workshop your login name will be displayed and any comments you make may be treated as consultation responses. If the workshop is recorded this will be made clear at the beginning of the workshop so that you can switch off your camera if you do not wish your image to be captured.

Who do we share the information with?

1. Your image may be shared with the three SLP authorities (Cheltenham Borough Council, Gloucester City Council and Tewkesbury Borough Council) and published on the SLP website, the three authority's websites, the Citizen Lab consultation platform or the Council's social media channels.

Is any information transferred to or stored on servers based outside the UK?

In using social media platforms, the council is effectively authorising these services to transfer, store and use your information (recorded image and audio, and name references in the recording) in the countries in which they operate as per their privacy policies.

There may be other occasions where we transfer your data outside the UK. This is because we use software which is cloud hosted outside of the UK, and we have appointed a sub-processor, CitizenLab, which stores data outside the UK. In the event that an international data transfer is necessary we will ensure that your data is processed securely and that one of the following conditions are met:

- the country receiving the data is considered by the EU to provide an adequate level of data protection under the UK GDPR and Data Protection Act 2018;
- the organisations receiving the data is covered by an arrangement recognised by the UK as providing an adequate standard of data protection under UK Data Protection legislation;
- the transfer is governed by approved UK contractual clauses.

How long do we keep your information?

Information is kept in line with Tewkesbury's planning policy [retention schedule](#).

1. Your image will be retained indefinitely unless we are requested to remove them by the consultee.

Who do we collect information from?

We collect the information from members of the public and those attending meetings and public events both online and in-person.

What are the consequences if we do not collect the data?

We are collecting this information as part of the councils' statutory planning obligation to consult on local plans as set out in The Town and Country Planning (Local Planning) (England) Regulations 2012.

If we do not collect this data we will not be able to create promotional materials featuring local people at real events or visually record evidence of the events.

Are any decisions about you made by automatic means?

No decisions are made about you by automatic means.

Your rights as a data subject

By law, you have a number of rights as a data subject, and this does not take away or reduce these rights.

These rights are:

- Request **access to your personal information** (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- Request **correction of the personal information** that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request **erasure of your personal information**. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground.
- Request the **restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- Request the **transfer of your personal information** to another party.

All information is processed in accordance with Tewkesbury Borough Council’s data protection policy.

If you wish to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact the council’s Data Protection Officer in writing at dpo@tewkesbury.gov.uk, or via post to:

Tewkesbury Borough Council
Public Services Centre
Gloucester Road
Tewkesbury
GL20 5TT

If you are unhappy or wish to complain about how your personal data is used, you should contact Tewkesbury Borough Council’s Data Protection Officer in the first instance via email at dpo@tewkesbury.gov.uk.

If you are still not satisfied, you can complain to the Information Commissioners Office. Their website address is www.ico.org.uk and their postal address is:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire

SK9 5AF

Security

We use appropriate technical, organisational and administrative security measures to protect any information we hold in our records from loss, misuse, and unauthorised access, disclosure, alteration and destruction. We have written procedures and policies which are regularly audited, and the audits are reviewed at senior level.