

HOLNE PARISH COUNCIL

Data Protection Policy

1. Purpose

The Parish Council is committed to protecting personal data and handling it lawfully, fairly, and transparently. This policy explains how the Council meets its obligations under the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018, and supports compliance with Assertion 10 – Digital and Data Compliance of the Annual Governance and Accountability Return (AGAR).

2. Scope

This policy applies to:

- Councillors
- The Clerk and any employees
- Contractors or volunteers who process personal data on behalf of the Council

It covers all personal data held in electronic or paper form.

3. What Is Personal Data?

Personal data means any information that can identify a living individual, including (but not limited to):

- Names, addresses, phone numbers, email addresses
- Financial information
- Opinions or correspondence about individuals

Special category data (e.g. health information) is handled with additional care.

4. Data Controller

The Parish Council is the Data Controller for the personal data it processes.

Day-to-day responsibility for data protection rests with the Clerk, acting on behalf of the Council.

5. Data Protection Principles

The Parish Council will ensure that personal data is:

1. Processed lawfully, fairly, and transparently
 2. Collected for specified and legitimate purposes only
 3. Adequate, relevant, and limited to what is necessary
 4. Accurate and kept up to date
 5. Kept no longer than necessary
 6. Processed securely
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6. Lawful Basis for Processing

The Parish Council processes personal data under one or more lawful bases, including:

- Legal obligation
- Public task
- Contract

Consent is only used where appropriate and can be withdrawn.

7. Data Security

The Parish Council will take appropriate measures to keep personal data secure, including:

- Password protection and access controls
- Secure storage of paper records
- Use of approved IT systems and cloud services
- Compliance with the Council's IT Policy (including BYOD provisions)

Personal data must only be accessed by those authorised to do so.

8. Data Sharing

Personal data will only be shared:

- Where there is a lawful basis
- With authorised bodies or individuals
- In a secure manner

Data will not be shared unnecessarily or for commercial purposes.

9. Retention of Data

Personal data will be kept only for as long as necessary and in line with the Council's retention practices. Data that is no longer required will be securely deleted or destroyed.

10. Individual Rights

Individuals have rights under data protection law, including the right to:

- Access their personal data
- Request correction of inaccurate data
- Request erasure (where applicable)
- Object to processing in certain circumstances

Requests should be made in writing to the Clerk and will be handled within statutory timescales.

11. Data Breaches

Any actual or suspected data breach must be reported to the Clerk immediately. The Council will:

- Assess the risk
 - Take appropriate action
 - Report to the Information Commissioner's Office (ICO) where required
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12. Freedom of Information

Data protection and Freedom of Information obligations will be balanced carefully. Personal data will not be disclosed in response to FOI requests where exemptions apply.

13. Relationship to Other Policies

This policy should be read alongside:

- The Parish Council IT Policy (including BYOD)
- The Parish Council Retention of Documents Policy & Retention Schedule

Together, these policies support compliance with Assertion 10 – Digital and Data Compliance.

14. Policy Review

This policy will be reviewed periodically and updated as necessary to reflect changes in legislation or guidance.