

Deeping Gate Parish Council

Data Protection Policy

To be adopted, 10th March 2026

Minute: 26.27.2.b

1. Introduction

Deeping Gate Parish Council “the council” is committed to protecting the rights and freedoms of individuals with respect to the processing of personal data.

The Council processes personal data in accordance with:

- The UK General Data Protection Regulation (UK GDPR)
- The Data Protection Act 2018
- Guidance issued by the Information Commissioner’s Office (ICO)

The Council recognises that personal data must be treated lawfully, fairly, and transparently and that appropriate technical and organisational measures must be in place to safeguard it.

The Council is registered as a Data Controller with the Information Commissioner’s Office (Registration Number: ZA529825).

2. Scope

This policy applies to all personal data processed by the Council, including but not limited to:

- Employees and former employees
- Job applicants
- Councillors
- Contractors and suppliers
- Members of the public
- Complainants and correspondents

It applies to data held in both paper and electronic formats.

3. Data Protection Principles

The Council will comply with the data protection principles set out in Article 5 of UK GDPR. Personal data shall be:

1. Processed lawfully, fairly and transparently
2. Collected for specified, explicit and legitimate purposes
3. Adequate, relevant and limited to what is necessary
4. Accurate and kept up to date
5. Retained only for as long as necessary

6. Processed securely

The Council is responsible for demonstrating compliance with these principles in accordance with the accountability principle.

4. Lawful Basis for Processing

The Council processes personal data under one or more of the following lawful bases:

- Public task
- Legal obligation
- Contract
- Consent
- Legitimate interests (where appropriate)

Special category data will only be processed where an additional lawful condition applies under Article 9 UK GDPR.

5. Responsibilities

The Council has appointed The Clerk as the person responsible for data protection compliance.

Their responsibilities include:

- Ensuring compliance with data protection legislation
- Maintaining data protection documentation
- Advising councillors and staff
- Acting as contact point for the ICO and data subjects

All councillors and staff are responsible for:

- Processing personal data in accordance with this policy
- Maintaining confidentiality
- Reporting data breaches immediately

In accordance with the Digital Economy Act 2017, the Council is exempt from the requirement to appoint a statutory Data Protection Officer (DPO). The Clerk performs the role of the 'Responsible Officer' for data protection purposes.

6. Individual Rights

Individuals have the following rights under UK GDPR:

- Right to be informed
- Right of access (Subject Access Request)
- Right to rectification
- Right to erasure (where applicable)
- Right to restrict processing
- Right to data portability (where applicable)

- Right to object

Requests must be responded to within one month unless an extension is lawfully applied.

7. Data Security

The Council will implement appropriate technical and organisational measures to protect personal data, including:

- Secure email and password protection
- Restricted access to sensitive data
- Locked storage for paper records
- Secure disposal of confidential waste
- Councillors and staff must use Council-provided email address for all official business.

8. Data Breaches

A personal data breach is any incident that leads to accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to personal data.

All breaches must be reported immediately to the Clerk.

Where required, the Council will:

- Notify the ICO within 72 hours
- Inform affected individuals where there is a high risk to their rights and freedoms

A breach log will be maintained.

9. Data Retention

The Council will retain personal data only for as long as necessary to fulfil its purpose or comply with legal obligations.

Retention periods will be set out in the Council's Document Retention Schedule.

The Council will provide clear Privacy Notices explaining:

- What data is collected
- Why it is collected
- Lawful basis
- How long it is kept
- Individual rights

Separate Privacy Notices may apply for:

- Employees
- Councillors
- Members of the public
- Website users

10. Record of Processing Activities

The Council maintains a Record of Processing Activities (Data Map) in accordance with UK GDPR.

This document records the types of personal data processed, the lawful basis for processing, retention periods, and any sharing with third parties.

The Clerk is responsible for maintaining and reviewing this record.

Document History and Review			
Version	Adoption date	Minute Ref.	Notes
1.0	10 th March 2026	26.27.2.b	First adoption

Next scheduled review: March 2027