

# Woodham Mortimer and Hazeleigh Parish Council

## DATA PROTECTION POLICY

### 1 - Introduction

Woodham Mortimer and Hazeleigh Parish Council ("the Council") is committed to protecting personal data and ensuring that it is processed in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. The Council already addresses aspects of data protection through its IT Policy and Publication Scheme. This standalone policy brings those statements together to clearly demonstrate the Council's compliance with data protection legislation and best practice.

### 2 - Scope

This policy applies to:

- All personal data processed by the Council
- Councillors, the Clerk, and any persons acting on behalf of the Council
- All formats of data including electronic records, paper files, emails, and audio recordings.

### 3 - Data Controller

Woodham Mortimer and Hazeleigh Parish Council is the Data Controller under the UK GDPR. Day-to-day responsibility for data protection compliance rests with **The Clerk to the Council**.

### 4 - Principles of Data Protection

The Council will ensure that personal data is:

- Processed lawfully, fairly and transparently
- Collected for specified, explicit and legitimate purposes
- Adequate, relevant and limited to what is necessary
- Accurate and kept up to date
- Kept for no longer than necessary
- Processed securely mitigating unauthorised or unlawful processing, loss, destruction or damage.

### 5 - Lawful Basis for Processing

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

- Legal obligation
- Public task
- Contract
- Consent (where applicable)

### 6 - Types of Personal Data Held

The Council may hold personal data relating to:

- Councillors and the Clerk
- Contractors and suppliers
- Members of the public contacting the Council
- Complainants
- Individuals appearing in meeting minutes or correspondence

Special category data will be processed only where necessary and with appropriate safeguards. The Council does not use personal data for marketing purposes.

## **7 - Data Security**

The Council takes appropriate measures to protect personal data, including:

- Secure storage of paper records
- Password protection and encryption where appropriate
- Access restricted to authorised persons only

Detailed technical and operational security arrangements are set out in the Council's IT Policy, which should be read alongside this policy. The Council does not transfer personal data outside the UK unless appropriate legal safeguards are in place.

## **8 - Data Retention and Disposal**

Personal data will be retained only for as long as necessary for the purpose for which it was collected and in line with statutory requirements.

Data will be securely disposed of when no longer required, including:

- Secure deletion of electronic files
- Confidential shredding of paper documents.

## **9 - Publication of Information**

When publishing information, including agendas, minutes and other documents, the Council will:

- Publish only what is necessary to comply with transparency obligations
- Redact personal data where appropriate

These arrangements are covered in more detail in the Council's Publication Scheme.

## **10 - Data Subject Rights**

Individuals have rights under UK GDPR, including the right to:

- Access their personal data
- Rectify inaccurate data
- Request erasure where applicable
- Restrict or object to processing

Subject Access Requests (SARs) should be submitted to the Clerk. The Council will respond within one month in accordance with UK GDPR.

## **11 - Personal Data Breaches**

Any actual or suspected personal data breach must be reported immediately to the Clerk.

The Council will:

- Investigate the breach
- Take steps to contain and mitigate it
- Report to the Information Commissioner's Office (ICO) where required
- Notify affected individuals where appropriate.

## **12 - Training and Awareness**

Councilors and officers will be made aware of their data protection responsibilities, and this policy will be available to all who handle personal data on behalf of the Council.

## **13 - Review**

This policy will be reviewed at least every two years, or sooner if legislation or guidance changes.

**Adopted by the Council 09/06/2026**

..... *Simon Brady*..... (Chairman to the Council) 12/05/2026