

Laverstoke & Freefolk Parish Council

DATA PROTECTION POLICY

1. Introduction

Laverstoke & Freefolk Parish Council (“the Council”) collects and processes personal data to fulfil its duties and obligations as a public authority. The Council is committed to complying with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018, ensuring that all personal data is handled lawfully, fairly, and transparently.

2. Purpose of This Policy

This policy sets out how the Council manages personal data, explains the rights of individuals, and outlines the responsibilities of staff, councillors, and volunteers who process personal data on behalf of the Council.

3. Data Protection Principles

The Council will ensure that personal data is:

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. Kept for no longer than necessary
6. Processed securely

The Council is responsible for demonstrating compliance with these principles.

4. Lawful Bases for Processing

The Council will only process personal data where a lawful basis applies, including:

- Performing a task in the public interest or in the exercise of official authority
- Compliance with a legal obligation
- Performance of a contract
- Consent (only where appropriate and freely given)
- Protection of vital interests
- Legitimate interests (rare for public authorities)

Special category data will only be processed under the additional conditions set out in the UK GDPR.

5. Roles and Responsibilities

- The Council: Overall responsibility for compliance and oversight.
- The Clerk/RFO (Data Protection Lead): Ensures day-to-day compliance, maintains records, manages data subject requests, and reports any personal data breaches.
- Councillors, staff, and volunteers: Must follow this policy, complete training where required, and report any concerns or breaches immediately.

6. Types of Personal Data Held

The Council may process personal data including:

- Contact details (name, address, phone, email)
- Financial information (for payments, salaries, or grants)
- Employee and councillor information
- Correspondence, complaints, and enquiries
- ENewsletter subscription (name, email, subscription preferences)
- Planning and licensing consultation responses
- Data used for management of L&F Community Site e.g. hall bookings

The Council will only collect data necessary for its functions.

7. Data Subject Rights

Individuals have the following rights:

- To be informed
- To access their data
- To rectification
- To erasure (where applicable)
- To restrict processing
- To data portability (rarely applicable to councils)
- To object

Requests should be submitted to the Clerk/RFO and will be handled within one month unless an extension is legally permitted.

8. Retention and Disposal of Data

Data will be kept only for as long as necessary, in line with recognised local government retention schedules.

Secure disposal methods will be applied, including shredding, secure digital deletion, and destruction of storage media when no longer required.

9. Data Security

See IT Policy for how the Council will ensure security.

Councillors and staff must ensure data on personal devices is protected.

10. Sharing Personal Data

Personal data will only be shared where:

- Required by law
- Necessary for delivering council services (e.g., with contractors under written agreements)
- Explicit consent has been provided
- Required by external audit or public inspection regulations

Data will not be sold or shared for marketing purposes.

11. Data Breaches

All personal data breaches must be reported immediately to the Clerk/RFO.

Breaches will be investigated, logged, and, where necessary, reported to the Information Commissioner's Office (ICO) within 72 hours.

A separate Data Breach Policy and Data Breach Log are maintained.

12. Privacy Notices

The Council will publish clear privacy notices explaining:

- What data is collected
- Why it is processed
- How long it is kept
- The lawful basis for processing
- Who to contact regarding concerns

Privacy notices will be reviewed regularly.

13. Training and Awareness

Councillors, staff, and volunteers involved in handling personal data will receive appropriate guidance and training to ensure compliance with this policy.

14. Policy Review

This policy will be reviewed annually in May or sooner if required e.g. if legislation changes.

Approved by Laverstoke & Freefolk Parish Council on

Date: 9.12.25