

Upper Heyford Parish Council Data Protection Policy

Reviewed & Approved in the Parish Council Meeting on the 17th July 2025
Minute Reference 19. a)
Next review July 2027

1. Introduction

Upper Heyford Parish Council is committed to protecting the personal data it holds and processes. This policy outlines how the Council complies with its responsibilities under the **UK General Data Protection Regulation (UK GDPR)** and the **Data Protection Act 2018**.

This policy applies to all councillors, employees, contractors, and volunteers who handle personal data on behalf of the Council.

2. Definitions

- **Personal Data:** Any information relating to an identifiable individual (data subject).
- **Processing:** Any action performed on personal data, including collection, storage, use, sharing, and deletion.
- **Data Controller:** The person or organisation that determines the purpose and means of processing personal data. For the purposes of this policy, the Data Controller is Upper Heyford Parish Council.
- **Data Processor:** A third party that processes data on behalf of the Data Controller.

3. Principles of Data Protection

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 no longer than necessary**
6. **Processed in a secure manner**

4. Lawful Bases for Processing

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

- Compliance with a legal obligation
- Performance of a public task
- Consent (when freely given and documented)
- Contractual necessity
- Legitimate interests (where appropriate)

5. Rights of Individuals

Individuals have the following rights under data protection law:

- The right to be informed about how their data is used
- The right of access (Subject Access Request)
- The right to rectification of inaccurate data
- The right to erasure (in limited circumstances)

- The right to restrict processing
- The right to object to processing
- The right to data portability (in specific contexts)

The Council will respond to all Subject Access Requests within one calendar month. Requests must be made in writing to the Parish Clerk.

6. Data Security

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

- Using secure, password-protected devices and systems
- Restricting access to personal data to those who need it
- Encrypting or anonymising data where appropriate
- Physically securing paper records
- Ensuring that councillors and staff receive basic data protection training

7. Sharing and Third Parties

The Council will only share personal data with third parties:

- When required by law (e.g. auditors, HMRC)
- With data processors under a written agreement ensuring GDPR compliance
- With the individual's consent (when necessary)

The Council will not sell or misuse personal data.

8. Data Retention and Disposal

The Council will retain personal data only for as long as necessary, in line with its **Document Retention and Disposal Policy**. When no longer required, data will be securely deleted or destroyed.

9. Data Breaches

Any personal data breach must be reported immediately to the Parish Clerk. If a breach is likely to result in a risk to individuals' rights and freedoms, the Council will notify the Information Commissioner's Office (ICO) within **72 hours** and, where necessary, inform the affected individuals.

10. Training and Awareness

All staff and councillors who process personal data will receive appropriate training. This policy will be included in the induction process for new staff and councillors.

11. Responsibilities

- **The Parish Council** is the Data Controller and is ultimately responsible for ensuring compliance with data protection laws.

- **The Parish Clerk** acts as the point of contact for data protection matters and is responsible for day-to-day compliance, maintaining records, and responding to requests.

12. Review of the Policy

This policy will be reviewed **every two years** or earlier if there are changes in legislation or council operations.

13. Contact Details

For any queries or to exercise your data protection rights, contact:

Parish Clerk

Sarah Burrows
Upper Heyford Village Hall
Somerton Road
Upper Heyford OX25 5LB

You can also contact the **Information Commissioner's Office** (ICO):

Website: www.ico.org.uk

Helpline: 0303 123 1113