

# Wyverstone Parish Council Data Protection & Information Management Policy

**Adopted:** 12<sup>th</sup> May 2026

**Review Date:** May 2027

## 1. Purpose

Wyverstone Parish Council (hereafter the Council) recognises its requirement to comply with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, and guidance issued by the Information Commissioner's Office (ICO). This policy explains how the Council collects, stores, uses, and protects personal data. This data does not have to be sensitive and can be as little as a name and an address. It applies to all personal data held in either paper or electronic form.

## 2. Scope

This policy applies to:

- Councillors
- Employees
- Contractors
- Volunteers
- Anyone processing 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 no longer than necessary
6. Processed securely and protected against unauthorised or unlawful processing, loss, destruction, or damage
7. Managed in accordance with accountability obligations

## 4. Lawful Basis for Processing

The Council processes personal data only where there is a lawful basis, including:

- Consent
- Legal obligation
- Public task
- Contract
- Legitimate interests

The lawful basis will be identified before personal data is processed.

## 5. Personal Data Held

The Council will only collect information necessary for its official business and may collect and process:

- Names and addresses
- Telephone numbers
- Email addresses
- Employment information
- Financial information for payments
- Correspondence and complaints
- Electoral records

## **6. Special Category Data**

Where the Council processes special category data (such as health information), it will ensure additional safeguards are in place as required by law.

## **7. Data Security**

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

- Password-protected devices and accounts
- Secure storage of paper records
- Restricted access to personal data
- Secure disposal of confidential waste
- Use of secure email and cloud systems where appropriate

All councillors and staff must take reasonable steps to protect information.

## **8. Data Sharing**

Personal data will only be shared where:

- There is a lawful basis to do so
- It is necessary for the Council to operate efficiently
- The individual has consented
- The Council is legally required to share the information

The Council will ensure third-party processors provide sufficient guarantees of compliance with UK GDPR.

## **9. Data Retention**

The Council will retain personal data only for as long as necessary and in accordance with its Document Retention Policy. Data no longer required will be securely deleted or destroyed. See appendix.

## **10. Individual Rights**

Individuals have rights under UK GDPR, including:

- The right to be informed
- The right of access
- The right to rectification
- The right to erasure (where applicable)
- The right to restrict processing
- The right to object
- The right to data portability (where applicable)

Requests should be made to the Parish Clerk.

## **11. Data Breaches**

Any personal data breach must be reported immediately to the Parish Clerk.

The Council will:

- Investigate the breach
- Take steps to minimise risks
- Maintain a breach record
- Report breaches to the ICO where legally required

## **12. Roles and Responsibilities**

Under the Data Protection Act, parish councils are not considered to be a public authority for data protection purposes and is therefore not required to appoint a formal Data Protection Officer so the Council as a whole is the Data Controller and is

accountable for ensuring compliance with this policy. The day-to-day responsibilities are delegated to the clerk including maintaining records, handling requests, reporting breaches, reviewing policies.

All councillors and staff are responsible for complying with this policy.

### **13. Training and Awareness**

Appropriate data protection awareness and training will be provided where necessary.

### **14. Review**

This policy will be reviewed annually or earlier if legislation or ICO guidance changes.

### **15. Contact Details**

**Parish Clerk:** Kate Webster  
email [clerk@wyverstoneparishcouncil.gov.uk](mailto:clerk@wyverstoneparishcouncil.gov.uk)

Information about data protection rights is available from the [Information Commissioner's Office \(ICO\)](#)