

Bredenbury Group Parish Council
Data Protection Policy
April 2026

1 Executive Summary

This policy provides a frame work for ensuring that Bredenbury Group Parish Council ("the Parish Council") meets its obligations under the UK General Data Protection Regulation ("UK GDPR") and associated Data Protection legislation including Data Protection Act 2018 ("DPA 2018"). It applies to all the processing of all personal data by the Parish Council where it is the Data Controller. This includes processing carried out by all Parish Council employees, councillors, volunteers, and contractors.

2 Policy Statement

The Parish Council is committed to ensuring that all personal information is handled in a secure and confidential manner in accordance with its obligations under DPA 2018 and UK GDPR. The Parish Council will use all appropriate and necessary means at its disposal to comply with these obligations.

3 Scope

This policy applies to all personal data and special categories of personal data processed by the Parish Council and as defined under UK GDPR.

4 Background

The Act governs the handling of personal information that identifies living individuals directly or indirectly and covers both manual and computerised information. It provides a mechanism by which individuals about whom data is held ("Data Subjects") can have a certain amount of control over the way in which it is handled.

Some of the main features of DPA 2018 are:

- All data covered by DPA 2018 must be handled in accordance with the Six Data Protection Principles set out in section 6.
- Data Subjects have various rights under DPA 2018 including but not limited to the right to be informed about what personal data is being processed, the right to request access to that information, the right to request that inaccuracies or incomplete data are rectified, and the right to have personal data erased and to prevent or restrict processing in specific circumstances.
- Processing of special categories of data must be done under a lawful basis. This data includes information about race, ethnic origin, political persuasion, religious belief, trade union membership, genetics, biometrics (where used for identification purposes), health, sex life and sexual orientation.
- DPA 2018 deals with criminal offence data in a similar way to special category data and sets out specific conditions providing lawful authority for processing it.
- There is a principle of accountability of data controllers to implement appropriate technical and organisational measures that include internal data protection policies and procedures, staff training and awareness of the requirements of the , internal audits of processing activities, maintaining relevant documentation on processing activities, appointing a data protection officer, and implementing measures that meet the principles of data protection by design and data protection by default, including data minimisation, transparency, and creating and improving security features on an ongoing basis.
- Data breaches that are likely to result in a risk to the rights and freedoms of individuals must be reported to the Information Commissioner's Office within 72 hours of the council becoming aware of the breach.
- Where a breach is likely to result in a high risk to the rights and freedoms of individuals, the council will notify those individuals concerned directly.
- The Information Commissioner is responsible for regulation and issue notices to organisations where they are not complying with the requirements of DPA 2018. They also have the ability to prosecute those who commit offences under the DPA 2018 and to issue fines.

5 Roles and Responsibilities

a. Parish Council

The Parish Council will be responsible for ensuring that the organisation complies with its responsibilities under DPA 2018 through monitoring of activities and incidents. The Parish Council will also ensure that there are adequate resources to support the work outlined in this policy to ensure compliance with DPA 2018.

b. All Staff and Councillors

All staff and councillors will ensure that:

- i. Personal information is treated in a confidential manner in accordance with this and any associated policies.
- ii. The rights of data subjects are respected at all times.
- iii. Privacy notices will be available to inform individuals how their data is being processed.
- iv. Personal information is only used for the stated purpose, unless explicit consent has been given by the Data Subject to use their information for a different purpose.
- v. Personal information is only disclosed on a strict need to know basis, to recipients who are entitled to that information.
- vi. Personal information held within applications, systems, personal or shared drives is only accessed in order to carry out work responsibilities.
- vii. Personal information is recorded accurately and is kept up to date.
- viii. They appropriately handle any subject access requests and/or requests in relation to the rights of individuals.
- ix. They appropriately handle actual or potential breaches of DPA 2018 as soon as the breach is discovered.

c. Contractors and Volunteers

All contractors and volunteers will be bound by the same requirements as staff and councillors and where necessary, these obligations will be included in formal contracts between the Parish Council and third parties.

Principles

This policy aims to ensure compliance with DPA 2018, UK GDPR, all associated legislation and successor legislation guided by the six data protection principles that require:

- a) **Lawfulness, fairness and transparency**—data shall be processed lawfully, fairly and in a transparent manner
- b) **Purpose limitation**—data shall be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes
- c) **Data minimisation**—data shall be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed
- d) **Accuracy**—data shall be accurate and where necessary, kept up to date
- e) **Storage limitation**—data shall be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed
- f) **Integrity and confidentiality (security)**—data shall be processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures

6 Records Management

All records shall be retained and disposed of in accordance with the Parish Council retention schedule.

7 Consent

The Parish Council will take all reasonable steps to ensure that service users, members of staff, volunteers, and contractors are informed of the reasons the Parish Council requires information from them, how that information will be used and who it will be shared with. This will enable the data subject to give explicit

informed consent to the Parish Council handling their data where the legal basis for processing is consent.

Should the Parish Council wish to use personal data for any purpose other than that specified when it was originally obtained, the Data Subject's explicit consent should be obtained prior to using the data in the new way unless exceptionally such use is in accordance with other provisions of DPA 2018.

Should the Parish Council wish to share personal data with anyone other than those recipients specified at the time the data was originally obtained, the data subject's explicit consent should be obtained prior to sharing that data, failure to do so could result in a breach of confidentiality.

8 Accuracy and Data Quality

The Parish Council will ensure that all reasonable steps are taken to confirm the validity of personal information directly with the Data Subject.

All members of staff and councillors must ensure that service user personal information is checked and kept accurate and up to date on a regular basis, for example, by checking it with the service user when they attend for appointments in order that the information held can be validated.

Where a member of the public exercises their right for their personal data to be erased, rectified, or restricted, or where a member of the public objects to the processing of their data, the Parish Clerk must be notified and the appropriate procedures followed.

9 Complaints

Any expression of dissatisfaction from an applicant with reference to the Parish Council's handling of personal information will be treated as a complaint and handled under the Parish Council's complaint's processes.

Should the complainant remain dissatisfied with the outcome of their complaint to the Council, a complaint can be made to the Information Commissioner's Office who will then investigate the complaint and take action where necessary.

10 Security and Confidentiality

All staff and councillors shall ensure that information relating to identifiable individuals is kept secure and confidential at all times.

The Parish Council shall ensure that its holdings of personal data are properly secured from loss or corruption and that no unauthorised disclosures of personal data are made.

11 Rights of Data Subjects

Individuals wishing to make a data subject access request should contact the Parish Clerk who will arrange for the information to be processed in accordance with DPA 2018.

Adopted at the meeting held on 29th April 2026