



# WHITTINGHAM, CALLALY & ALNHAM PARISH COUNCIL

## Data Protection Policy

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### 1. Purpose

Whittingham, Callaly and Alnham (WCA) Parish Council is committed to protecting the privacy and personal data of individuals in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

### 2. Scope

This policy applies to all personal data held by the Council, whether held electronically or in hard copy, and covers Councillors, staff, contractors, volunteers, and members of the public.

### 3. Data Protection Principles

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 only as long as necessary
- Processed securely

### 4. Lawful Basis for Processing

The Council will identify and document the lawful basis for all personal data it processes. Common bases include:

- Legal obligation
- Public task
- Consent (for non-statutory activities such as mailing lists)



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## 5. Individual Rights

The Council will uphold the rights of individuals, including:

- The right to be informed
- The right of access
- The right to rectification
- The right to erasure (in certain circumstances)
- The right to restrict processing
- The right to data portability
- The right to object

## 6. Data Security

The Council will take appropriate technical and organisational measures to protect personal data. This includes:

- Using password-protected systems and devices
- Secure storage of paper records
- Regular data backups
- Minimising data access to only those who need it

## 7. Data Breaches

Any personal data breach must be reported to the Clerk immediately. The Clerk will assess whether the breach needs to be reported to the Information Commissioner's Office (ICO) and affected individuals.

## 8. Data Sharing

Personal data will only be shared where necessary and lawful, such as with service providers, auditors, or government bodies. Any data sharing will be proportionate and documented.



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## **9. Retention and Disposal**

Personal data will be retained only for as long as necessary. The Council maintains a Retention and Disposal Schedule which sets out how long data will be kept and how it will be securely destroyed.

## **10. Roles and Responsibilities**

The Clerk acts as the Council's Data Protection Officer (DPO) and is responsible for ensuring compliance with this policy.

## **11. Training and Awareness**

Councillors and staff will be made aware of their responsibilities through induction and periodic training.

## **12. Review**

This policy will be reviewed every two years or sooner if required by changes in legislation or guidance.



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## General Privacy Notice

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### 1. Introduction

Whittingham, Callaly and Alnham (WCA) Parish Council is committed to protecting your personal data and respecting your privacy. This notice explains what personal data we collect, why we collect it, and how we handle it.

### 2. Who We Are

WCA Parish Council is the data controller. You can contact the Clerk by email at [whittinghampc29@gmail.com](mailto:whittinghampc29@gmail.com) or by post at the address on our website.

### 3. What Personal Data We Collect

We may collect and process the following personal data:

- Name, address, email address, telephone number
- Bank details (for suppliers/grant recipients)
- Photographs (e.g. from public events)
- Any other information provided by individuals in correspondence or forms

### 4. Why We Collect Your Data

We collect your data to:

- Deliver council services and carry out our statutory duties
- Manage finances, including payments and grants
- Communicate with residents and stakeholders
- Administer meetings and events
- Fulfil legal or regulatory obligations

### 5. Lawful Basis for Processing

We process your data under one or more of the following lawful bases:



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- Legal obligation
- Public task
- Contract
- Consent (for non-statutory communications)

## **6. Sharing Your Data**

We do not sell your data. We may share it with:

- Councillors and employees of the council (as necessary)
- Service providers and contractors
- Regulatory bodies or public authorities (when legally required)

## **7. How Long We Keep Your Data**

We retain personal data only as long as necessary. Our Retention and Disposal Schedule outlines specific timeframes.

## **8. Your Rights**

You have the right to:

- Access your personal data
- Request correction or deletion
- Object to processing
- Request restriction of processing
- Lodge a complaint with the Information Commissioner's Office (ICO)

## **9. Security**

We have measures in place to protect your data, including secure systems, password protection, and limited access to records.



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## **10. Cookies and Website**

If our website uses cookies, a separate Cookie Notice will explain this. We do not track users.

## **11. Contact Us**

If you have questions about how we use your data, please contact the Clerk.



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## Retention and Disposal Schedule

This schedule outlines how long the Council retains different types of records and how they are disposed of in accordance with good governance, legal requirements, and data protection principles.

Document Type	Minimum Retention Period	Final Action
Minutes (Council and Committees)	Permanent	Archive
Agendas and meeting papers	5 years	Delete/Destroy
Financial accounts and annual returns	6 years	Archive
Bank statements, cheque books, invoices	6 years	Shred
Contracts and agreements	6 years after end of contract	Review/Destroy
Payroll and tax records	6 years	Shred
Staff records (employment history)	6 years after employment ends	Shred
Insurance policies and certificates	6 years after policy expires	Review/Archive
Planning applications (responded to)	1 year after decision	Delete
Grant applications (received)	3 years	Delete
Grant applications (awarded)	6 years	Review/Archive
General correspondence	2 years (unless part of a case file)	Delete
Complaints correspondence	6 years after closure	Shred
Emails (routine)	1 year	Delete

This schedule will be reviewed every two years or when legislation or guidance changes.

Adopted by WCA Parish Council on: 20/05/2025 Minute 59/25 (e)



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