



Data Protection Policy

Adopted by Winterborne St Martin Parish Council on: 27 July 2026

1. Purpose of this Policy

This policy sets out how Winterborne St Martin Parish Council complies with its obligations under the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

It explains how personal data is collected, used, stored, protected and disposed of, and outlines the rights of individuals whose data the Council holds.

2. Scope

This policy applies to:

- All personal data processed by the Council
- All councillors, employees, volunteers and contractors who handle personal data on behalf of the Council
- All systems, paper records and digital platforms used for Council business

3. Definitions

- Personal Data: Any information relating to an identifiable living individual.
- Special Category Data: Sensitive personal data requiring additional protection (e.g., health information).
- Processing: Any operation performed on personal data, including collection, storage, use, sharing or deletion.
- Data Subject: The individual to whom the personal data relates.

- Data Controller: The organisation determining how and why personal data is processed (the Council).
- Data Processor: A third party processing data on behalf of the Council.

4. 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 no longer than necessary
- Processed securely

5. Lawful Basis for Processing

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

- Public Task: Performing tasks carried out in the public interest or in the exercise of official authority
- Legal Obligation: Compliance with legislation (e.g., financial regulations, employment law)
- Contract: Where processing is necessary for a contract with an individual
- Consent: Where the individual has given clear permission
- Vital Interests: To protect someone's life

- Legitimate Interests: Only where appropriate and not overriding individuals' rights

6. Roles and Responsibilities

6.1 The Council

- Acts as the Data Controller
- Ensures compliance with UK GDPR
- Approves this policy and any amendments

6.2 The Clerk / Responsible Officer

- Manages day-to-day data protection compliance
- Maintains records of processing activities
- Responds to data subject requests
- Ensures secure storage and disposal of data
- Reports data breaches to the Council and, where required, the ICO

6.3 Councillors

- Handle personal data only for legitimate Council purposes
- Follow this policy and any related procedures
- Report concerns or breaches to the Clerk

6.4 Contractors and Service Providers

- Must comply with UK GDPR
- Must sign appropriate data processing agreements where required

7. Data Collected by the Council

The Council may collect and process:

- Contact details of residents, suppliers and contractors
- Correspondence relating to Council business
- Employment and payroll information
- Allotment tenancy records (if applicable)
- Planning consultation responses
- CCTV or audio recordings (if applicable)
- Website usage data (if applicable)

Special category data will only be processed where strictly necessary and with appropriate safeguards.

8. Data Storage and Security

The Council will ensure that:

- Electronic data is stored on password-protected devices
- Cloud services used are GDPR-compliant
- Paper records are kept in locked storage
- Access is restricted to authorised personnel
- Data is backed up securely
- Personal data is not stored on personal devices unless authorised and protected

9. Data Retention and Disposal

The Council will follow its Document Retention Schedule and ensure that:

- Personal data is kept only as long as necessary

- Data is securely destroyed when no longer required
- Minutes, financial records and statutory documents are retained in accordance with legal requirements

10. Sharing and Disclosure of Data

Personal data will only be shared:

- Where required by law
- With third-party processors under written agreement
- With other authorities where necessary for public tasks
- With consent from the data subject

The Council will never sell personal data.

11. Data Subject Rights

Individuals have the right to:

- Access their personal data
- Request correction of inaccurate data
- Request erasure (where applicable)
- Restrict processing
- Object to processing
- Request data portability (where applicable)

Requests must be submitted to the Clerk and will be responded to within one month.

12. Data Breaches

A data breach is any incident leading to unauthorised access, loss, disclosure or destruction of personal data.

The Clerk will:

- Investigate the breach
- Take immediate steps to mitigate harm
- Report serious breaches to the ICO within 72 hours
- Report findings to the Council

13. Use of the Council Website and Email

- The website will include a Privacy Notice compliant with UK GDPR
- Emails containing personal data will be sent securely
- Councillors must use official email accounts for Council business

14. Review of Policy

This policy will be reviewed annually at the Annual Meeting of the Parish Council, or sooner if legislation or circumstances change.