



Lathom South Parish Council

# Data Protection Policy

V1.0

Adopted December 2025



LATHOM SOUTH PARISH COUNCIL

# **Lathom South Parish Council**

## **Data Protection Policy**

### **1. Introduction**

This Data Protection Policy sets out how the Parish Council collects, uses, stores, and protects personal data in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. The Parish Council is committed to ensuring that personal data is handled lawfully, transparently, and securely.

The Parish Council acts as the Data Controller for the personal data it processes.

### **2. Scope**

This policy applies to:

- All Councillors
- The Clerk and Responsible Financial Officer
- Any volunteers or contractors working on behalf of the Council

It covers all personal data processed by the Council, regardless of format (electronic, paper, email, or other).

### **3. What is Personal Data?**

Personal data is any information relating to an identifiable person.

Examples include:

- Names, addresses, email addresses, telephone numbers
- Employment details
- Photographs
- Correspondence containing personal information

Special category (sensitive) data includes information about health, religion, political opinions, or other protected characteristics. The Council will only process such data when strictly necessary and with appropriate safeguards.

#### **4. Data Protection Principles**

The Parish Council will ensure that all 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. Stored no longer than necessary
6. Processed and stored securely

#### **5. Lawful Basis for Processing**

The Council will only process personal data when one or more lawful bases apply, such as:

- Public task
- Legal obligation
- Consent
- Contract
- Legitimate interests (only in limited circumstances where the Council is not performing a public task)

Consent will always be freely given, specific, informed, and revocable.

#### **6. Data the Parish Council Collects**

The Parish Council may collect personal data for purposes including:

- Correspondence from residents
- Management of the council's finances
- Employment records of staff
- Councillor contact information
- Management of website communication and enquiries

## **7. Data Sharing**

Personal data will only be shared when:

- Required by law
- Necessary for council functions
- The individual has given explicit consent

The Council will never sell personal data or share it for marketing purposes.

## **8. Data Retention**

The Council will follow a simple Retention Schedule based on NALC/SLCC guidance. After the retention period ends, data will be securely destroyed or deleted.

## **9. Data Security**

The Council will ensure that personal data is protected by:

- Secure password-protected devices
- Encrypted storage where appropriate
- Locked filing cabinets
- Secure email practices
- Limiting access to authorised individuals only

## **10. Rights of Individuals**

Individuals have rights including:

- Right to be informed
- Right of access
- Right to rectification
- Right to erasure
- Right to restrict processing
- Right to data portability
- Right to object

Subject Access Requests (SARs) may be submitted to the Clerk via email to [clerk@lathomsouthparishcouncil.gov.uk](mailto:clerk@lathomsouthparishcouncil.gov.uk). Such SAR requests will be acknowledged by the Clerk within one month of the date of receipt.

The Privacy Notice on the Parish Council website explains how personal data is used.

### **11. Roles and Responsibilities**

The information below provides clarity around accountability in relation to the implementation and operation of this Policy;

- The Clerk is responsible for day-to-day data protection compliance.
- Councillors are responsible for handling all personal data securely
- The Council as a public body is the Data Controller for the personal data that it processes
- The Council processes personal data in relation to, for example;
  - *Planning comments submitted by residents*
  - *Councillor declarations of interests*
  - *Direct contact from members of the public in relation to local topics or concerns*
  - *Website comments or contact-form submissions*

### **12. Data Breaches**

A data breach is any incident that compromises personal data.

If a breach occurs:

- It must be reported immediately to the Clerk
- The Council will assess the risk and decide if it must be reported to the ICO
- Affected individuals will be notified when necessary
- Breaches likely to cause harm will be reported to the ICO within 72 hours, per UK GDPR requirements.

### **13. The Data Protection Officer (DPO)**

Small parish councils are not legally required to appoint a DPO under UK GDPR rules. The Parish Clerk will act as the responsible officer for data protection matters.

#### **14. Review of Policy**

This policy will be reviewed when legislation or council practices change.