

Cromhall Parish Council

Data Protection Policy

Version	Date adopted	Minute ref:	Details / Key Changes	Review due
1.0	11/5/2022	05/2022 9c		
1.1	26/3/2024	2024/03/10.1	Reviewed, minor formatting changes only. Contact details updated.	
1.2	25/3/2025	2025/03/10.2	Reviewed, no amendments	
1.3	24/3/26	2025/03/10.2	Added data breach procedure. Amended section on data storage & access.	March 2027

Introduction

Cromhall Parish Council recognises its responsibility to comply with the General Data Protection Regulations (GDPR) 2018 which regulates the use of personal data. This does not have to be sensitive data; it can be as little as a name and address.

General Data Protection Regulations (GDPR)

The GDPR set out high standards for the handling of personal information and protecting individuals' rights for privacy. It also regulates how personal information can be collected, handled and used. The GDPR applies to anyone holding personal information about people, electronically or on paper. Cromhall Parish Council has also notified the Information Commissioner that it holds personal data about individuals.

When dealing with personal data, Cromhall Parish Council staff and members must ensure that:

- *Data is processed fairly, lawfully and in a transparent manner*

This means that personal information should only be collected from individuals if staff have been open and honest about why they want the personal information.

- *Data is processed for specified purposes only*

This means that data is collected for specific, explicit and legitimate purposes only.

- *Data is relevant to what it is needed for*

Data will be monitored so that too much or too little is not kept; only data that is needed should be held.

- *Data is accurate and kept up to date and is not kept longer than it is needed*

Personal data should be accurate, if it is not it should be corrected. Data no longer needed will be shredded or securely disposed of.

- *Data is processed in accordance with the rights of individuals*

Individuals must be informed, upon request, of all the personal information held about them.

- *Data is kept securely*

There should be protection against unauthorised or unlawful processing and against accidental loss, destruction or damage.

Storing and accessing data

Cromhall Parish Council recognises its responsibility to be open with people when taking personal details from them. This means that staff must be honest about why they want a particular piece of personal information.

Cromhall Parish Council may hold personal information about individuals such as their names, addresses, email addresses and telephone numbers. These will be securely kept at the Cromhall Parish Council Office or within the council's secure email system and are not available for public access. All data stored on the Cromhall Parish Council Office computer and cloud storage system is password protected. Once data is no longer needed, is out of date or has served its use and falls outside the retention time defined in the Council's document retention policy, it will be shredded or securely deleted from the computer / email system.

Councillors shall not save any documents containing personal data (e.g. email addresses) to long term storage on personal devices, and shall delete any temporary downloads, which may be created when viewing email attachments.

Subject Access Requests

Cromhall Parish Council is aware that people have the right to access any personal information that is held about them. Subject Access Requests (SARs) must be submitted in writing to the Clerk (this can be done in hard copy, email or social media). If a person requests to see any data that is being held about them, the SAR response must detail:

- How and to what purpose personal data is processed
- The period Cromhall Parish Council tend to process it for
- Anyone who has access to the personal data

The response must be sent within 30 days and will be supplied free of charge.

If a SAR includes personal data of other individuals, Cromhall Parish Council must not disclose the personal information of the other individual. That individual's personal information may either be redacted, or the individual may be contacted to give permission for their information to be shared with the Subject.

Individuals have the right to have their data rectified if it is incorrect, the right to request erasure of the data, the right to request restriction of processing of the data and the right to object to data processing, although rules do apply to those requests.

Confidentiality

Cromhall Parish Council members and staff must be aware that when complaints or queries are made, they must remain confidential unless the subject gives permission otherwise. When handling personal data, this must also remain confidential.

Action in the event of a data breach

In the event of a personal data breach, Cromhall Parish Council will act promptly to contain the incident, assess its likely impact, and determine whether the breach presents a risk to the rights and freedoms of individuals.

Any councillor who becomes aware of a breach or potential breach must report this to the Clerk as soon as possible.

The Clerk will record all relevant details, including the nature of the breach, categories of data affected, number of individuals involved and any remedial actions taken. Where a breach is likely to result in a risk to individuals, the Council will notify the Information Commissioner's Office within

72 hours of becoming aware of it. Where there is a high risk to individuals, those affected will also be informed as soon as possible in clear and accessible language.

All breaches, regardless of severity, will be logged in the Council's Data Breach Register and reviewed to identify lessons learned and improvements to data protection practices.

Policy review

This policy will be reviewed at least annually.