

Parish Council of Coleford

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Gallant Hill Farm
Foxcote
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BA3 5YB

Data Protection Policy

To be Adopted: - May 2026

Coleford Parish Council is registered with the Information Commissioner as a Data Controller

1. Introduction

Coleford Parish Council ("the Council") is committed to protecting the privacy and security of personal data. This policy explains how the Council complies with:

- UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- Freedom of Information Act 2000
- Local Government Act 1972

The Council processes personal data to carry out its lawful functions, deliver services, and meet statutory obligations.

2. Purpose of This Policy

This policy sets out:

- How the Council collects, uses, stores, and protects personal data
- The rights of individuals whose data is held
- The responsibilities of councillors, staff, and volunteers
- Procedures for responding to data breaches and subject access requests

This policy should be read alongside the **Document Retention & Disposal Policy**.

3. Definitions

Personal Data Any information relating to an identifiable individual.

Special Category Data Sensitive data requiring additional protection (e.g., health, ethnicity).

Data Controller Coleford Parish Council — responsible for determining how data is processed.

Data Processor Any third party acting on behalf of the Council (e.g., payroll provider).

Processing Any operation performed on personal data (collecting, storing, sharing, deleting).

4. Data Protection Principles

The Council complies with the six principles of UK GDPR. Personal data must be:

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. Kept no longer than necessary
6. Processed securely

5. Lawful Basis for Processing

The Council processes data under the following lawful bases:

- **Legal obligation** (e.g., financial records, burial registers)
- **Public task** (e.g., responding to planning consultations)
- **Contract** (e.g., allotment tenancy agreements)
- **Consent** (e.g., mailing lists)
- **Vital interests** (rare, e.g., emergency contact information)

Where consent is used, it must be freely given, specific, informed, and withdrawable at any time.

6. Categories of Personal Data Held

The Council may process:

- Contact details (residents, contractors, councillors)
- Financial information (invoices, payroll)
- Allotment tenancy records
- Burial records
- Planning correspondence
- CCTV footage (if applicable)
- Staff employment records
- Email correspondence

Special category data is processed only when strictly necessary and with appropriate safeguards.

7. Data Storage & Security

The Council ensures that:

- Paper records are stored in locked cabinets
- Electronic files are password-protected
- Backups are held securely off-site or in encrypted cloud storage
- Access is restricted to authorised personnel
- Devices are protected by up-to-date security software

Councillors must use council-approved email accounts for council business.

8. Data Sharing

The Council will only share personal data when:

- Required by law
- Necessary to perform a public task
- Required for audit or inspection
- The individual has given explicit consent

The Council will never sell personal data.

9. Retention & Disposal

Personal data is retained in accordance with the **Document Retention & Disposal Policy**.

When data is no longer required:

- Paper documents are shredded or disposed of as confidential waste
- Electronic files are securely deleted
- A **Destruction Log** is maintained

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10. Rights of Individuals

Individuals have the right to:

- Be informed about how their data is used
- Access their personal data
- Request correction of inaccurate data
- Request deletion (where lawful)
- Restrict processing
- Object to processing
- Data portability (where applicable)

Requests must be responded to within **one month**.

11. Subject Access Requests (SARs)

Requests must:

- Be made in writing (email or letter)
- Include sufficient information to identify the individual

The Clerk will:

1. Acknowledge the request
2. Verify identity
3. Provide the information within one month
4. Record the request in the SAR Register

12. Data Breaches

A data breach includes:

- Loss of personal data
- Unauthorised access
- Accidental disclosure
- Cyber-attack

Procedure:

1. Clerk notified immediately
2. Breach logged
3. Risk assessed
4. ICO notified within 72 hours if risk is high
5. Affected individuals informed where necessary

13. Councillor Responsibilities

Councillors must:

- Use council email accounts
- Store documents securely
- Dispose of papers appropriately
- Not retain personal data longer than necessary
- Follow this policy at all times

14. Training

The Council will provide training to councillors and staff on:

- Data protection principles
- Secure handling of information
- Recognising and reporting breaches

15. Review of Policy

This policy will be reviewed **annually** or sooner if legislation changes.

Useful Contacts:

Information Commissioner Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Telephone 0303 123 1113

Website: www.ico.gov.uk