



High Offley Parish Council

(including the Wards of Shebdon & Woodseaves).

Data Policy 2024.

Formally adopted by Council: Adopted 13 June 2024 (Minute 24/057).

Next Review: June 2024, or before.

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High Offley Parish Council recognises its responsibility to comply with the General Data Protection Regulations 2018 (GDPR), which regulate the use of all personal data. Personal data includes names, physical and electronic addresses, other contact information, marital status, family information, account numbers, voter registration numbers, and any other personal information that could be used to identify an individual.

High Offley Parish Council has notified the Information Commissioner that it holds personal data about individuals.

Key Principles.

When dealing with personal data, High Offley Parish Councillors and the Clerk must ensure that:

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

Personal data should only be collected from individuals, if the request is open and honest about the reasons that such information is required.

2. **Data is processed for specified purposes only.**

Personal data is collected for specific, explicit and legitimate purposes only.

3. **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.

4. **Data is accurate, kept up to date and is not kept longer than it is needed.**

Inaccurate personal data must be corrected. Data no longer needed will be securely disposed of.

5. **Data is processed in accordance with the rights of individuals.**

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

6. **Data is kept securely.**

Personal data must be protected against unauthorised or unlawful processing and against accidental loss, destruction or damage.

Storing and Accessing Data.

High Offley Parish Council may hold personal information about individuals, such as their names, addresses, email addresses and telephone numbers. These will be kept securely by the Clerk, or Councillors, and are not available for public access. All data stored on the High Offley Parish Council computer is password protected.

Subject Access Requests.

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

- How and for what purpose, personal data is processed;
- the period that High Offley Parish Council tend to process it for; and
- anyone who has access to the personal data.

The response must be sent within thirty (30) days and is free of charge.

If a Subject Access Request includes personal data of other individuals, High Offley Parish Council must not disclose the personal information of the other individual(s). All additional personal information relating to other people 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;
- request erasure of the data;
- request restriction of processing of the data, and
- the right to object to data processing, although rules do apply to such requests.

Confidentiality.

Personal data must remain confidential, unless the subject gives permission to the contrary. High Offley Parish Council Councillors and the Clerk are aware that when complaints or queries are made, identifying details must also remain confidential.

Any business declared to be confidential by the Council, shall not be disclosed to any person who is not a High Offley Parish Councillor or the Clerk.

Review of Data.

Parish Councillors and the Clerk must regularly review all data held electronically (including emails), or otherwise, every twelve (12) months, at a minimum, to assess whether they are in possession of personal information about an individual, and whether is legitimately required. If it is not legitimately required, such data must securely disposed of forthwith.

A legitimate requirement for holding data may be to support an on-going or open enquiry, case, query or complaint. Data may be retained for a reasonable amount of time after a matter is closed, or completed. This reasonable period will depend on individual circumstances, and should be agreed by the Parish Council at point of closure, but it should not be anticipated to be in excess of twelve (12) months, in most situations.

Email.

High Offley Parish Councillors and Clerk often communicate via email. Email accounts used for Council communications must be individual accounts in the name of the councillor and must be password protected. The password must not be shared with any other person (other than the Clerk) and must not be stored in close proximity to the devices used to connect to email. Computer devices used to access email must be password protected and protected with anti-virus software, where applicable.

Council Information.

Information made available to councillors through email, or via distribution of papers, must be treated as confidential, until after the information has been disclosed at a public meeting, or on the council website.

Papers copies should not be left anywhere where a member of the public could see them, for example on the seat of an unattended vehicle. Papers and documents should be stored at the home of a Councillor, or the Clerk, or the Parish Council filing cabinet stored in the locked room at Woodseaves Village Hall.

Council Property.

Council Property must be securely stored in an appropriate location. The High Offley Parish Council computer must be stored securely at the home of a Councillor, or the Clerk, when unattended.