



Redgrave Parish Council

DATA PROTECTION POLICY

Purpose

Redgrave Parish Council (RPC) is committed to being transparent about how it collects and uses personal data, and to meeting its data protection obligations in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 (DPA). This policy outlines the RPC's commitment to data protection, the rights of individuals, and how the Council complies with statutory and proper practice standards, including SAPP 2025, the Local Government Transparency Code 2015, and the Freedom of Information Act 2000.

Scope

This policy applies to the personal data collected by the RPC of current and former job applicants, employees, workers, contractors, and former employees, referred to as HR-related personal data. This policy does not apply to the personal data relating to members of the public or other personal data processed for RPC business. It also governs how the RPC ensures compliance when publishing information under the Transparency Code and responding to Freedom of Information (FOI) requests.

The Parish Clerk is the appointed Data Protection Officer responsible for ensuring compliance with this policy. All questions or requests for information should be directed to the Parish Clerk.

Definitions

'Personal data' means any information relating to an identified or identifiable living individual. 'Processing' includes collecting, recording, storing, or otherwise using data. 'Special category data' means personal data revealing racial or ethnic origin, political opinions, religious beliefs, trade union membership, genetic or biometric data, health, or sexual orientation.

Data Protection Principles

RPC will process personal data in accordance with the following principles:

- Process lawfully, fairly, and transparently.
- Collect data for specified, explicit, and legitimate purposes.
- Ensure data is adequate, relevant, and limited to what is necessary.
- Keep data accurate and up to date.
- Retain data only as long as necessary.
- Protect data with appropriate technical and organizational measures.

RPC will document all processing activities in accordance with UK GDPR Article 30 and maintain supporting evidence for audit, as required under SAPP 2025 proper practices.

Lawful Basis for Processing

RPC will process personal data lawfully under one or more of the following bases:

- It is necessary for the performance of a contract.
- It is necessary to comply with a legal obligation.
- It is necessary for the RPC's legitimate interests.
- It is necessary for the performance of a public task or in the exercise of official authority.
- Consent has been obtained from the data subject, where required.

Special Category and Criminal Records Data

The RPC will process special category data and criminal conviction data only where permitted by law, and with additional safeguards. Processing will be based on employment law obligations, substantial public interest, or explicit consent, as appropriate.

Individual Rights

Data subjects have the right to access, rectify, erase, restrict, or object to processing of their personal data. Requests should be made to the Parish Clerk. RPC will respond within one month in accordance with statutory timescales.

If a request concerns information not classed as personal data, the Freedom of Information Act 2000 applies. The Parish Clerk will review FOI requests in accordance with the RPC's FOI Policy and Publication Scheme.

Data Security and Breach Reporting

The RPC will maintain technical and organizational measures to protect data from unauthorized access, loss, or destruction. All employees and councillors must ensure secure handling of personal data, whether in electronic or paper form.

Any suspected data breach must be reported immediately to the Parish Clerk. If a breach presents a risk to individuals, the Clerk will notify the Information Commissioner's Office (ICO) within 72 hours and affected individuals where necessary.

Where a data processor acting on behalf of the RPC becomes aware of a breach, it must report this to the Parish Clerk without undue delay in accordance with Article 33(2) UK GDPR.

Transparency and Publication

The RPC will publish information as required under the Local Government Transparency Code 2015 and the Freedom of Information Act 2000, ensuring that personal data is redacted before publication unless disclosure is legally required.

This policy and the RPC's Privacy Notices will be made available on the RPC website. Public transparency will always be balanced against the obligation to protect personal data.

Training and Awareness

All councillors, staff, and volunteers handling personal data must undertake periodic data protection training to maintain awareness of their responsibilities under this policy and the UK GDPR.

Retention and Record Keeping

RPC will retain personal data only for as long as necessary and in accordance with its Document Control and Records Management Policy. Retention periods will reflect statutory and audit requirements under SAPP 2025.

Governance and Review

Compliance with this policy will be reviewed annually and confirmed within the Annual Governance and Accountability Return (AGAR) under Section 1, Assertion 5 (Risk Management and Data Protection). The RPC will record compliance evidence for internal and external audit purposes.