

DATA PROTECTION POLICY (UK GDPR & DPA 2018)

Adopted by Full Council: 11/03/26 | Review due: March 2027 |
Owner: Parish Manager

1. INTRODUCTION

Oakthorpe, Donisthorpe & Acresford Parish Council (the “Council”) is the Data Controller for the personal data it processes. We comply with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

2. PRINCIPLES (Article 5 UK GDPR)

We process personal data lawfully, fairly and transparently; for specified purposes; with data minimisation; accuracy; storage limitation; integrity/confidentiality; and accountability.

3. WHAT PERSONAL DATA WE PROCESS

- Identity and contact data (names, roles, addresses, phone, email).
- Correspondence and enquiries.
- Financial data (payee details, payments, grants, hire fees).
- Images used for council purposes.
- Special category data (only when necessary): health, equalities data, safeguarding.
- Criminal offence data only where lawful (e.g., recruitment checks).

4. LAWFUL BASES (Article 6) & SPECIAL CATEGORY (Article 9)

We rely on: Public Task; Legal Obligation; Contract; Consent; Vital Interests; or Legitimate Interests. Special category processing uses a permitted condition (e.g., substantial public interest) plus appropriate policy safeguards.

5. HOW WE USE DATA

To deliver services; respond to public enquiries; manage finances; administer cemeteries/assets; publish agendas, minutes and decisions; consult residents; manage staff/councillors/volunteers; meet transparency and audit duties.

6. SHARING

We share data only where necessary with staff/councillors/volunteers, processors (IT/hosting/maintenance), auditors, banks, regulators, insurers, other authorities or emergency services. Processors must provide appropriate security and act only on our instructions.

7. INTERNATIONAL TRANSFERS

Where a processor stores data outside the UK, we ensure appropriate safeguards (e.g., UK IDTA / EU SCCs endorsed for UK use) and risk assessments.

8. RETENTION & DISPOSAL

We retain data per the Council's Records Retention Schedule and legal obligations (finance/audit/cemetery). At end of retention, we securely delete, shred or anonymise.

9. SECURITY MEASURES

Technical/organisational controls include encrypted storage, access control and MFA, secure backups, anti-malware/EDR, patching, training, locked storage for paper, and adherence to the IT & Email (Cyber Security) Policy.

10. RIGHTS OF INDIVIDUALS

Access; rectification; erasure; restriction; objection; portability (where applicable); the right to withdraw consent; and the right to lodge a complaint with the ICO. Identity verification is required for requests (see SAR Procedure).

11. DPIAs

We complete Data Protection Impact Assessments for high-risk processing (new systems, large-scale or sensitive data, monitoring/CCTV if adopted).

12. CHILDREN & VULNERABLE PEOPLE

We apply extra care and data minimisation. Consent from holders of parental responsibility is obtained where required by law.

13. DATA BREACHES

We record all personal data incidents and assess risk. Where risk is likely, we notify the ICO within 72 hours and, if high risk, the affected individuals. See Data Breach Procedure.

14. CONTACT DETAILS

Data Controller: Parish Manager, Oakthorpe Leisure Centre, Measham Road, Oakthorpe DE12 7RG. Email: manager@oakthorpedonisthorpeandacresford-pc.gov.uk

15. GOVERNANCE

- This policy is approved by Full Council.
- Training: induction and annual refresh offered for staff/councillors.
- Monitoring: internal audits; review of incidents and Subject Access Request (SAR) metrics.
- Review: annual or on significant change.

version number	Purpose/change	Author	Date
0.1	Initial draft	KG	7/22
0.2	Amended	KG	7/24
0.3	Amended	KG	05/02/26