



Purley on Thames Parish Council

PURLEY ON THAMES PARISH COUNCIL DATA PROTECTION POLICY

Introduction

Purley on Thames Parish Council recognises that personal data must be handled lawfully, securely and transparently.

The Council collects and processes personal information in order to carry out its statutory duties and provide services to the local community.

Purley on Thames Parish Council acts as the Data Controller for the personal data it processes. This policy sets out how the Council ensures compliance with:

- UK General Data Protection Regulation
- Data Protection Act 2018

The Council is registered with the Information Commissioner's Office and complies with its data protection obligations.

Data Protection Principles

The Council processes personal data in accordance with the following principles. Personal data will be:

- Processed lawfully, fairly and transparently
- Collected for specified, explicit and legitimate purposes
- Adequate, relevant and limited to what is necessary
- Accurate and kept up to date
- Retained only for as long as necessary
- Processed securely to prevent unauthorised access, loss or damage

What is Personal Data

Personal data is any information that identifies a living individual. Examples include:

- Names
- Addresses
- Email addresses
- Telephone numbers
- Financial information
- Employment records

Special category data includes sensitive information such as:

- Health information
- Racial or ethnic origin
- Political opinions

- Religious beliefs
- Trade union membership

This type of data requires additional protection.

Lawful Basis for Processing

The Council processes personal data under lawful bases defined within UK GDPR.

The most common lawful bases used by the Council are:

Public Task

Processing necessary for carrying out official functions or statutory duties.

Legal Obligation

Processing required to comply with legal requirements.

Contract

Processing necessary to fulfil contractual obligations.

Consent

Where individuals have given clear permission for their data to be used. The Council will only process personal data where a lawful basis exists.

How Personal Data is Collected

Personal data may be collected through:

- Correspondence from residents
- Parish Council services or activities
- Employment and recruitment processes
- Councillor engagement with parishioners
- Website enquiries or contact forms
- Public consultations or surveys

Only information necessary for legitimate Council purposes will be collected.

Storage and Security of Data

The Council takes appropriate technical and organisational measures to protect personal data. Security measures include:

- Secure Microsoft 365 email and document systems
- Password protection and Multi-Factor Authentication
- Restricted access to confidential information
- Secure disposal of paper records
- Backup and recovery procedures

Councillors and staff must follow the Council's IT Policy when handling personal data.

Data Sharing

The Council may share personal data where necessary with:

- Contractors or service providers
- Government departments or regulators
- Professional advisers

- Law enforcement authorities

Data will only be shared where lawful and necessary.

Personal information will never be sold or shared for marketing purposes.

Data Retention

The Council will retain personal data only for as long as necessary.

Retention periods are determined by:

- Legal requirements
- Operational needs
- Best practice guidance for local councils

The Council maintains a Retention Schedule to manage records appropriately.

When data is no longer required it will be securely deleted or destroyed.

Individual Rights

Individuals have rights under the UK General Data Protection Regulation, including:

- the right to be informed
- the right of access
- the right to rectification
- the right to erasure
- the right to restrict processing
- the right to data portability
- the right to object
- the right not to be subject to automated decision-making, including profiling

Some of these rights apply only in limited circumstances depending on the lawful basis for processing.

Requests relating to these rights should be directed to the Parish Clerk.

Subject Access Requests

Individuals have the right to request access to their personal data.

Requests should be made in writing to the Parish Clerk.

The Council will:

- Respond within one month
- Provide copies of personal data held
- Explain how the data is being used

In some circumstances exemptions may apply.

Data Breaches

A personal data breach is any incident that results in:

- Loss of personal data
- Unauthorised access to personal data
- Accidental disclosure of personal information
- Destruction or alteration of personal data

All suspected breaches must be reported immediately to the Parish Clerk.

Where a personal data breach poses a risk to individuals' rights and freedoms, it will be reported to the Information Commissioner's Office within 72 hours.

Records of Processing Activities

The Council maintains appropriate records describing how personal data is processed, including the types of personal data held, the purposes of processing and retention periods.

These records may include the Council's Retention Schedule, privacy notices and other governance documentation.

Maintaining these records helps demonstrate compliance with data protection legislation.

Responsibilities

Parish Council

The Council is responsible for ensuring appropriate governance arrangements are in place to protect personal data.

Parish Clerk

The Clerk is responsible for:

- Managing data protection compliance
- Handling Subject Access Requests
- Investigating data breaches
- Maintaining relevant policies and procedures

Councillors and Staff

Councillors and staff must:

- Follow the Council's data protection and IT policies
- Protect confidential information
- Report suspected breaches immediately

Privacy Notices

The Council provides Privacy Notices explaining how personal data is used.

Privacy notices are available:

- On the Council website
- Upon request from the Parish Clerk

Complaints

Anyone who believes their data has been mishandled should contact the Parish Clerk in the first instance.

If concerns remain unresolved, individuals may contact the Information Commissioner's Office.