PERSONAL DATA MANAGMEENT POLICY AND DATA PROCESSING REGISTER

Adopted by the Council on 9th May 2022, Subsequent amendments and ratifications are listed at the end of this document.

Data Management

The Parish Council as Data Controller will ensure the Principles of Data Protection legislation will be followed in the management of personal data and that employees and councillors understand the requirements of the new legislation.

The Clerk will follow the underlying principles that personal data:

(a) Must be processed ***lawfully, fairly and transparently***.

(b) Is only used for a ***specific processing purpose*** that the data subject has been made aware of and no other, without further consent.

(c) Should be ***adequate, relevant and limited*** i.e., only the minimum amount of data should be kept for specific processing.

(d) Must be ***accurate*** and where necessary ***kept up to date***.

(e) Should ***not be stored for longer than is necessary***, and that storage is safe and secure.

(f) Should be processed in a manner that ensures ***appropriate security and protection*****.**

The Clerk, as Data Protection Officer, will manage subject access requests allowing data subjects to exercise their rights under the UKGDPR:

- ***The right to access personal data we hold on you***
- ***The right to correct and update the personal data we hold on you***
- ***The right to have your personal data erased***
- ***The right to object to processing of your personal data or to restrict it to certain purposes only***
- ***The right to data portability***
- ***The right to withdraw your consent to the processing at any time for any processing of data to which consent was obtained***
- ***The right to lodge a complaint with the Information Commissioner's Office.***

The Council, as Data Controller has adopted a Privacy Policy which includes Subject Access Requests. All policies and relevant Data Protection information are available to view on the Council website (www.wooreparishcouncil.gov.uk) or via the Clerk (clerk@wooreparishcouncil.gov.uk).

The Clerk will also;

- Ensure that data is held securely, password controlled on a need-to-know basis and back-up systems are in place
- Maintain a processing log of data
- Ensure that data is held no longer than is necessary and follows guidelines for its deletion
- Ensure that Consent Forms are obtained where necessary, recorded and reviewed as necessary
- Oversee data protection impact assessments where required for new projects as directed by the Council as Data Controller
- Ensure the notification of personal data breaches in line with the Council's Security Incident Response Policy
- Report to Council on progress in compliance with GDPR to include any required monitoring identified

The current Audit Log of Data held which may be updated from time to time, but at least annually, is appended.

Appendix 1 – Data Audit log

SUBJECT	Nature/purpose of processing	Type of data/where is it from	Who is the data subject?	Lawful basis/bases for processing	Data Controls
Planning Applications	Consultations and decisions published by the Planning Authority and shared with Parish Council. Clerk emails details of each application and decision to parish councillors. Also published with agenda and minutes, and discussed in open forum. Parish council comments on application provided by Planning Authority	Name and contact information; Principal authority; residents/public	Planning applicant/resident; Other members of the public speaking in open public session at council meetings.	Legitimate interest / Public Task	• Clerk to check all information before sharing with parish councillors, and ensure sensitive personal data is redacted wherever possible before sharing or publishing. • Information in agenda and minutes to include only what is necessary to identify and discuss the application or decision. • Any correspondence between PC and applicant to be in accordance with data protection principles, and to be deleted within two years.
Electoral roll	Provided to Clerk at election time for election purposes only. Provided to individual Councillors on direct request only to Shropshire Electoral Office	Provided by Principal Authority contains names, address, marital status; principal authority	Parish residents	Legitimate interest / Public Task	Clerk to retain in a secure place, not to be shared; members of the public to be directed to Principal Authority for any electoral roll queries.
Parish Newsletter/Resident Surveys	Inform residents and gain views of residents	Resident Names and Contact details- from residents	Residents	Legitimate interest / Public Task	Clerk to retain in a secure place and obtain consent form. Not to be used for other purpose unless consent is given.

Website	Information relating to the Parish is published on the website	Residents' names and photographs	Members of public	Legitimate interest / Public Task	Photographs of individuals are not published on the website without the express permission of the individual and deleted after a maximum of two years. No copy of the photograph shall be retained by the PC
Councillor details	Clerk retains contact details/gathered for election purposes/published in accordance with Transparency Code and Code of Conduct	Name, address, contact details, and disclosable pecuniary interests	Parish Councillors	Legitimate interest / Public Task	• Details published on website in accordance with statutory requirements. • Data held by Clerk, on the PC laptop, and deleted when a councillor retires from office. • Requests for this data from third parties shall be referred to the website.
Correspondence from members of the public/residents/other parties relating to parish matters which may contain personal data.	May relate to Council Services, Council performance, request for service, reporting issues or making complaints	Name, address, contact details, with possible sensitive personal data, depending on the nature of the matter; provided by residents	Members of the Public/Residents	Legitimate interest / Public Task	• Any email letter of other form of query received by the PC which contains personal data will be retained for a maximum of two years • Such data may be stored on the PC laptop, held by the Clerk in a secure place. • The agreed privacy notice shall be provided to any person who contacts the PC. • In accordance with the agreed privacy notice, such data shall not be shared with any third party without the express permission of the data subject.
Minutes containing Council Public Forum	Matters raised by members of the public at Council meetings; Minutes include a record of discussion as required by Local Government legislation	Names and possibly other information	Residents/members of the public	Legitimate interest / Public Task	• Clerks should try to avoid inclusion of personal data in agenda or minutes. Where personal data or potential identifiers cannot be avoided, these should be kept to a minimum. • Members of the public who attend the public forum or the annual meeting should

					be informed by the Chair that the issue may be included in public minutes and should give their consent to this before the discussion (consent to be implied as Chair gives the members of the public the chance to withdraw from the meeting if they wish).
Contact with public in response to requests made at PC meetings	Letter/email to residents asking them to perform actions (eg trim trees or hedges)	Names, addresses and possibly other personal data provided by Cllrs/residents	Residents/members of the public	Legitimate interest / Public Task	• Copy to be retained on PC laptop, held by Clerk in a secure place, for a maximum of two years. • Information shall not be shared with any third party without express permission of the data subject.
Council Contracts and Services .	Correspondence with contractors/public to carrying out contracting work and services required by the Council;	Names, contact details, qualifications, financial details, details of certificates and diplomas, education and skills; provided in contract applications etc	Contractors/Trades persons surveyors, architects, builders, suppliers, advisers, payroll processors;	Performance of a contract / public task	Copy to be retained on PC laptop, held by Clerk in a secure place, for life of contract
Employment Applications	Application forms and CVs for Job Vacancies	Applicants provide personal details which may be sensitive	Applicants	Legitimate interest	Clerk to keep paper applications secure and collect any copies from councillors provided for interview; held for 6 months and then destroyed
Employee and former employee records	Contracts of employment, CVs, provided on recruitment and held on file	Personal data provided by employees	Employees and Former employees	Legitimate interest / Performance of a contract	Held secure by the Clerk with restricted access and shredded 6 years after

					employment ends; may contain sensitive personal data
Consider any other Subject where personal data may be held	Personal data which comes under the control of the PC which does not fit into any of the categories above	Names, addresses and possible other personal data.		Legitimate interest / Public task	• Clerk to process the data in accordance with the data protection principles, always ensuring that personal data is stored securely and not shared with any third party without the express permission of the data subject. • Clerk may need to bring report to Council to determine the way in which the data should be controlled, taking advice from the DPO and if necessary, provide a Personal Data Impact Assessment

Completed by: Clerk to the Parish Council

Contact: clerk@wooreparishcouncil.gov.uk

Policy Reviewed: May 2022	By: Full Council	Minute Item: 22013
Policy Reviewed: May 2023	By: Full Council	Minute Item: 23015
Policy Reviewed: May 2024	By: Full Council	Minute Item: 24012
Policy Reviewed: June 2025	By: Full Council	Minute Item: 25018
Policy Reviewed: May 2026	By: Full Council	Minute Item: 26014