

Aynho Parish Council

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Aynho Parish Council Data Protection & GDPR Policy

Adopted: 02 Mar 2026

Review: Mar 2028

1. Policy Statement

Aynho Parish Council is committed to protecting personal data and complying with the UK General Data Protection Regulation and the Data Protection Act 2018.

The Council recognises its responsibilities as a **Data Controller** and will ensure that personal data is processed lawfully, fairly, and transparently.

The Council is registered with the Information Commissioner's Office (ICO) as required.

2. Scope

This policy applies to:

- All councillors
 - The Clerk and any employees
 - Contractors acting on behalf of the Council
 - All personal data held in electronic or paper format
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3. Data Protection Principles

The Council will comply with the GDPR principles by ensuring that personal data is:

1. Processed lawfully, fairly and transparently
2. Collected for specified, explicit and legitimate purposes
3. Adequate, relevant and limited to what is necessary
4. Accurate and kept up to date

5. Kept no longer than necessary
 6. Processed securely
 7. Managed in a way that demonstrates accountability
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4. Lawful Basis for Processing

The Council processes personal data under the following lawful bases:

- **Public Task** – exercising official authority and statutory functions
- **Legal Obligation** – compliance with audit, finance and employment law
- **Contract** – hall/pavilion hire agreements, employment contracts
- **Consent** – where required (e.g. optional communications)

Special category data will only be processed where a lawful condition applies.

5. Categories of Personal Data Processed

The Council may process:

- 1 Employee and payroll information
- 2 Councillor contact details
- 3 Supplier and contractor details
- 4 Pavilion and facility hirer information
- 5 Planning representations and correspondence
- 6 Residents' enquiries and complaints
- 7 Email and written communications

The Council will not collect more information than is necessary.

6. Data Security

The Council will implement proportionate security measures including:

1. Use of official council email accounts
2. Password protection and multi-factor authentication where available
3. Restricted access to sensitive data
4. Secure storage of paper records
5. Locked filing cabinets

Adopted 2nd March 2026

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6. Secure shredding of confidential waste
7. Regular review of access permissions

Councillors must not use personal devices or email accounts for Council business without appropriate safeguards.

7. Data Retention

The Council will maintain a **Retention Schedule** based on sector guidance (e.g. from the National Association of Local Councils).

Personal data will not be kept longer than necessary and will be securely destroyed when no longer required.

8. Data Breaches

A personal data breach is any loss, unauthorised access, disclosure, or destruction of personal data.

If a breach occurs:

1. It must be reported immediately to the Clerk.
2. The Clerk will assess the risk.
3. If required, the ICO will be notified within 72 hours.
4. Affected individuals will be informed where there is a high risk to their rights and freedoms.

All breaches will be documented.

9. Individual Rights

Individuals have the following rights:

1. Right of access (Subject Access Request)
2. Right to rectification
3. Right to erasure (where applicable)
4. Right to restrict processing
5. Right to object
6. Right to data portability (limited circumstances)

Adopted 2nd March 2026

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Subject Access Requests must be responded to within one calendar month.

Requests should be made in writing to the Clerk.

10. Responsibilities

The Parish Council has overall responsibility for compliance.

The Clerk is responsible for:

- (i) Day-to-day data protection management
- (ii) Maintaining records of processing
- (iii) Handling data breaches
- (iv) Managing Subject Access Requests
- (v) Ensuring policies are reviewed annually

Councillors must:

1. Follow this policy
 2. Protect confidential information
 3. Use Council systems appropriately
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11. Review

This policy will be **reviewed and updated at least every two years** or sooner if legislation changes.

Version number	Purpose/change	Author	Date
0.1	Adopted	Alan Youel	02/03/26

Adopted 2nd March 2026

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