



Data Protection Policy

1. Introduction

Great Missenden Parish Council (the Council) is committed to complying with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, and all other relevant data protection legislation, including amendments made by the Data (Use and Access) Act 2025.

This policy explains how the Council collects, uses, stores and protects personal data, and how it meets its legal obligations as a data controller.

2. Definitions

- **Personal data:** Any information relating to an identified or identifiable individual.
- **Processing:** Any operation performed on personal data, including collection, storage, use, disclosure, and deletion.
- **Data controller:** The organisation that determines the purposes and means of processing personal data. For the purposes of this policy, this is Great Missenden Parish Council.
- **Data processor:** An organisation or individual that processes personal data, this is Great Missenden Parish Council.

3. Lawful Basis for Processing

The Council will only process personal data where it has a lawful basis under UK GDPR. The most common lawful bases relied upon by the Council are:

- **Public task** – where processing is necessary for the Council to perform its statutory or public functions.
- **Legal obligation** – where processing is required by law.
- **Legitimate interests** – where appropriate and balanced against individuals' rights.

Consent will only be relied upon where it is appropriate and meets the requirements of UK GDPR.

4. Data Protection Scope & Principles

Personal data is any information which is related to an identified or identifiable person. Processing includes the obtaining, holding, using or disclosing of such information. The Council must register with the Information Commissioners Office (ICO). The Council has ultimate responsibility for ensuring compliance with the data protection legislation.

The Council will ensure that personal data is:

- 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
- Kept for no longer than necessary

- Processed in an appropriately secure manner

Consent for one type of data processing does not give councils permission to do anything else with the personal data. There are additional protections for sensitive personal data e.g. data about race, religion, health, etc and the personal data of a child. A parent or guardian's consent must be obtained in order to process the personal data of children under 13.

5. Individuals' Rights

The Council recognises and will uphold individuals' rights under UK GDPR, including: -

- The right to be informed
- The right of access
- The right to rectification
- The right to erasure (in some circumstances)
- The right to restrict processing
- The right to object
- Rights related to automated decision-making

A data subject may request the personal data held on them as well as the purposes for the data being held. They may also request who has access to the personal data and where it was obtained from. Any such requests will be responded to within a month, where possible. These requests should be submitted to the Clerk – clerk@greatmissendenpc.co.uk.

Before providing the personal data requested the data will be reviewed to redact personal data of other data subjects. If the request for personal data is unfounded or excessive, a fee may be charged or the request may be refused.

Advice on all subject access requests will be sought from specialist organisations and/or the Information Commissioner.

6. Data Security

The Council will take appropriate technical and organisational measures to safeguard personal data, including:

- Secure office premises
- Password-protected devices and user accounts
- Up-to-date antivirus and firewall protection
- Secure storage of paper records
- Backups stored securely

Access to personal data is restricted to those who need it to perform their duties.

7. Data Audit and Processing Records

The Council maintains a record of the categories of personal data held, where it is stored, why it is held, and the lawful basis for processing. This record is reviewed and updated as required..

8. Retention and Disposal

Personal data will be retained only for as long as necessary. The Council maintains a formal Data Retention Schedule to support this.

9. Communications and Correspondence

Personal data contained in correspondence with the Council will be processed under the lawful basis of public task or legal obligation. Personal data will not be shared unnecessarily and will be redacted where appropriate.

14. Data Breaches

If anyone knows or suspects a data breach has occurred, details of the alleged breach should be submitted immediately in writing to the Clerk. The Clerk has responsibility for informing the Council.

A log will be kept of the details of the breach, actions taken and mitigation steps.

The Information Commissioner will be contacted to confirm if the breach is reportable. If the breach is reportable the report shall be made as soon as possible.

15. Data Protection Officer

The ICO has confirmed that parish councils do not need to appoint a Data Protection Officer although they may choose to do so.

16. Review

This policy will be reviewed annually or sooner if required by changes in legislation or guidance.

Date adopted: 12.01.26

Date of last review: