



LOSTOCK GRALAM
PARISH COUNCIL

Lostock Gralam Parish Council

Data Protection Policy

1. Introduction

Lostock Gralam Parish Council (“the Council”) is committed to protecting the privacy and security of personal data in accordance with the Data Protection Act 2018 and UK General Data Protection Regulation (UK GDPR).

This policy explains how the Council collects, uses, stores, and protects personal data, and the responsibilities of councillors and staff when handling such information.

2. Scope

This policy applies to all:

- Councillors
- The Clerk and employees
- Contractors and volunteers acting on behalf of the Council

All must comply with this policy when processing personal data.

3. Data Controller

The Council is the Data Controller.

The Clerk, Lyndsey Sandison, is responsible for the day-to-day management of data protection, compliance with legislation, and handling data requests.

4. Definitions

- **Personal Data:** Information relating to an identifiable living individual.
- **Special Category Data:** Sensitive personal data such as racial or ethnic origin, health, political opinions, religious beliefs, sexual orientation, or trade union membership.
- **Processing:** Any operation performed on personal data (e.g., collection, storage, use, disclosure, deletion).
- **Data Subject:** Individual whose data is held.
- **Data Processor:** Third party processing data on behalf of the Council.

5. Data Protection Principles

The Council will ensure personal data is:

1. Processed lawfully, fairly, and transparently
2. Collected for specific, explicit, and legitimate purposes
3. Adequate, relevant, and limited to what is necessary
4. Accurate and up-to-date
5. Retained only as long as necessary
6. Secured against unauthorized access, loss, or damage

6. Lawful Basis for Processing

The Council processes data under lawful bases including:

- **Legal obligation** – to comply with the law
- **Public task** – to carry out official functions
- **Consent** – where the individual has given clear permission
- **Contract** – where necessary for contractual obligations

Special category data will only be processed where additional lawful conditions are met.

7. Use of Personal Data

The Council uses personal data for purposes including:

- Administration of Council business
- Communication with residents, stakeholders, and councillors
- Employee and councillor management
- Financial administration, audits, and payroll
- Management of services, assets, and facilities
- Handling complaints and enquiries
- Compliance with legal obligations

8. Privacy Notices

The Council provides clear Privacy Notices to:

- Staff, councillors, contractors, and volunteers
- Residents and members of the public

Notices include:

- What data is collected
- Purpose and lawful basis
- How data is used and shared
- Retention period
- Individuals' rights
- Contact details for the Data Controller

9. Data Security

The Council will ensure:

- Paper records are stored securely and shredded when no longer needed
- Electronic data is password-protected, encrypted, and backed up
- Mobile devices are secured
- Access is restricted to authorised personnel
- Cloud storage is approved by the Clerk

10. Data Retention Schedule

Record Type	Retention Period	Notes
Minutes and agendas	Permanent	Archive after audit
Financial records (including VAT)	6 years	HMRC requirement
Payroll and staff records	6 years	Employee reference
Councillor personal data	6 years after term ends	Consent review
Planning applications / correspondence	6 years after completion	Legal obligations
Complaints / enquiries	3 years	Unless ongoing
Emails (official council accounts)	2 years	Backups retained securely

11. Sharing Data

The Council may share data with:

- Government and regulatory bodies
- Auditors and legal advisers
- Contractors providing services on behalf of the Council

All sharing complies with legislation, and contracts include appropriate data protection clauses.

12. Individual Rights

Individuals have the right to:

- Access their personal data (Subject Access Request)
- Request correction of inaccurate data
- Request erasure (Right to be forgotten)
- Restrict processing
- Data portability
- Object to processing

Requests should be submitted to the Clerk and will normally be responded to within one month.

13. Data Breaches

All data breaches must be reported to the Clerk immediately.

The Council will:

- Investigate and remediate
- Notify the ICO if required
- Notify affected individuals if there is a high risk

14. Data Protection by Design

Data protection considerations are built into all Council projects.

Privacy Impact Assessments (PIAs) are conducted when necessary.

15. Training and Awareness

All councillors and staff will receive training and guidance on data protection to ensure compliance.

16. Monitoring and Review

The Clerk will regularly monitor this policy, and it will be reviewed annually or following legislative changes.

17. Non-Compliance

Failure to comply may result in disciplinary action and expose the Council to legal or reputational risks.

18. Contact

For queries or concerns:

Clerk: Lyndsey Sandison

Email: Clerk@lostockgralamparishcouncil.co.uk

Phone: 07739 926 025