

Moretonhampstead Parish Council

Information & Data Protection Policy

Version: March 2026

Next Review: March 2028

1. Introduction

Moretonhampstead Parish Council (“the Council”) collects, uses, and manages information in order to deliver its services, meet its statutory obligations, and engage with the local community. This includes personal data about residents, staff, councillors, contractors, volunteers, and other individuals who interact with the Council.

This policy sets out how we manage personal and sensitive information in line with:

- UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- Freedom of Information Act 2000
- Local Government Transparency Code

The Council is committed to being transparent, fair, and accountable in all its information handling practices.

2. Contact Details

- **Name:** Moretonhampstead Parish Council
- **Address:** Green Hill, Fore Street, Moretonhampstead, TQ13 8LL
- **Phone:** 01647 440041
- **Email:** clerk@moretonhampstead-pc.gov.uk

The Clerk is the first point of contact for any data protection queries.

3. Data Controller and Responsible Officer

- The Council, as a corporate body, is the data controller and is ultimately responsible for ensuring compliance with data protection legislation.
- Day-to-day responsibility is delegated to the Clerk, who ensures policies and procedures are implemented.

4. Scope of the Policy

This policy applies to all information handled by the Council, including:

1. **Public information** – details about services, operations, and community initiatives.

2. **Confidential Council information** – commercially sensitive information.

3. **Personal data** – information about individuals, including:

- Staff, councillors, contractors, and volunteers
- Residents, service users, and complainants
- Social media interactions

5. Personal Data and Sensitive Information

Personal data: Any information that identifies a living individual, e.g., name, address, email, photos, or online identifiers.

Sensitive personal data: Includes racial/ethnic origin, political opinions, religious beliefs, health information, sexual orientation, trade union membership, biometric data, or data relating to offences.

Children's data: We will not knowingly process personal data of children under 18 without appropriate parental or guardian consent where required.

6. Why We Use Your Personal Data

We use the information you provide in order to:

- Deliver public services and understand residents' needs, including providing services you request and informing you of other relevant services
- Confirm your identity to provide some services
- Contact you by post, email, telephone, or social media (e.g., Facebook)
- Monitor and improve the Council's performance
- Prevent and detect fraud or misuse of public funds, and assist law enforcement where required
- Meet legal and statutory obligations, including delegated functions
- Promote the interests of the Council and local community initiatives
- Maintain Council accounts and records, including statutory records such as burial registers
- Seek your views, opinions, or comments through surveys or consultations
- Notify you of changes to facilities, services, events, staff, councillors, or other role holders
- Send communications you have requested or may find of interest, including campaigns, appeals, or new projects

- Process financial transactions, such as grants, payments, or fees for goods and services
- Analyse data statistically to plan and improve the provision of services

7. Lawful Basis for Processing

We rely on one or more lawful bases under UK GDPR:

- Consent – where individuals have agreed
- Performance of a contract – e.g., with staff or suppliers
- Legal obligation – e.g., record-keeping for HMRC, elections
- Vital interests – to protect life
- Public task – performing statutory Council functions
- Legitimate interests – e.g., operational or communication purposes

Sensitive personal data is only processed with explicit consent, legal requirement, or to protect vital interests.

8. How We Collect Data

Data may be obtained through:

- Correspondence (email, post, social media, telephone)
- Resident concerns or complaints
- Applications for services, grants, or events
- Council meetings and consultations
- Staff and contractor records
- Publicly available sources (where lawful)

9. How We Share Data

Data may be shared with:

- Councillors, staff, and contractors delivering Council services
- Pension providers, HMRC, auditors, and law enforcement where required
- Partner organisations where lawful and necessary
- Prospective employers for references (with consent)

We never sell personal data and take appropriate safeguards for all sharing.

10. Data Security

We implement appropriate technical and organisational measures to protect personal data:

- Secure Council offices with controlled access
- Password-protected computers and secure cloud storage (Microsoft 365)
- Staff training and awareness on data protection
- Regular backups and access control measures

11. Data Retention

Data is only kept as long as necessary:

- **Permanent:** Minutes of meetings, statutory records
- **Extended period:** Financial records (minimum 8 years for HMRC audits)
- **Claims/Legal purposes:** Retained as necessary (e.g., 3–6 years depending on claim)
- Other personal data is deleted or anonymised when no longer required in accordance with the Council's Retention and Disposal policy.

12. Rights of Data Subjects

Individuals have the right to:

- Access their personal data
- Rectify inaccurate or incomplete data
- Request erasure in certain circumstances
- Restrict processing in certain circumstances
- Object to processing
- Data portability where applicable

Requests are free and must be responded to within one month. Contact the Clerk at clerk@moretonhampstead-pc.gov.uk to exercise these rights.

13. Complaints

If you have concerns about the processing of your personal data:

1. Contact the Clerk or DPO first to resolve internally
2. If unresolved, contact the **Information Commissioner's Office (ICO)**:
 - Helpline: 0303 123 1113
 - Website: <https://ico.org.uk>

- Address: Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

14. Diversity Monitoring

The Council monitors staff, councillor, and volunteer diversity to ensure equality and prevent discrimination. This data is confidential, anonymised for reporting, and not used in recruitment selection.

15. Transparency and Publication

- The Council operates a Publication Scheme under the Freedom of Information Act 2000.
- Formal meetings, agendas, minutes, reports, and decisions are available to the public.
- Council transactions over £500, annual accounts, audit reports, and councillor responsibilities are published online.
- Confidential matters (staff, contractual, personal) are handled according to law and council resolution.

16. Updates to the Policy

This policy is reviewed periodically and updated to reflect changes in law, best practice, or operational requirements.