



SWAFIELD AND BRADFIELD PARISH COUNCIL

Swafield and Bradfield Parish Council – Data Protection Policy

Adopted: November 2025

Review Date: November 2026

1. Introduction

Swafield and Bradfield Parish Council (“the Council”) collects and uses certain types of information about individuals, including members of the public, councillors, contractors, employees, and volunteers. This personal information must be collected, handled, and stored in a secure manner, in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

The purpose of this policy is to ensure that the Council complies with data protection law and follows good practice when handling personal data.

2. Scope

This policy applies to all councillors, employees, volunteers, and contractors who handle personal data on behalf of the Council.

It covers all personal data that the Council holds relating to identifiable individuals, regardless of how it is stored (e.g. electronically, on paper, or recorded).

3. Data Protection Principles

The Council will comply with the data protection principles set out in the UK GDPR. Personal data shall be:

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 for no longer than necessary**
 6. **Processed securely**, protecting against unauthorised or unlawful processing, loss, destruction, or damage
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4. Lawful Basis for Processing

The Council will identify and document the lawful basis for processing personal data before any processing begins. The most common bases include:

- **Public Task:** Processing necessary for the performance of the Council's functions.
- **Legal Obligation:** Processing required by law (e.g. maintaining financial or electoral records).
- **Consent:** When the individual has given clear consent for specific purposes.
- **Contract:** Processing necessary for a contract with the individual.

Special category data (e.g. health information) will be handled with additional safeguards and only where lawful.

5. Data Subjects' Rights

Individuals have the following rights regarding their personal data:

- Right to be informed
- Right of access (Subject Access Request)
- Right to rectification
- Right to erasure (in certain circumstances)
- Right to restrict processing
- Right to data portability

- Right to object
- Rights related to automated decision making (not applicable to Council operations)

Requests to exercise these rights should be directed to the Clerk (see Section 12).

6. Data Security

The Council will ensure that personal data is kept secure by:

- Using strong passwords and secure storage systems
- Restricting access to authorised personnel only
- Regularly updating antivirus and security software
- Keeping paper records in locked cabinets
- Ensuring devices used for Council business are protected and not shared for personal use

Councillors and staff must ensure personal data is not disclosed to unauthorised individuals, either verbally, in writing, or electronically.

7. Data Retention and Disposal

Personal data shall be retained only as long as necessary to fulfil its purpose.

The Council's **Retention Schedule** outlines how long different categories of data are kept.

When no longer required, data will be securely destroyed—paper documents shredded and electronic data permanently deleted.

8. Data Breach Procedure

A personal data breach is any incident that results in the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data.

All breaches must be reported immediately to the Clerk.

Where a breach is likely to result in a risk to individuals' rights and freedoms, the Clerk will report it to the **Information Commissioner's Office (ICO)** within **72 hours** and notify affected individuals if required.

9. Data Sharing

The Council will only share personal data with third parties when there is a lawful basis and it is necessary to do so.

Any data sharing will be subject to written agreements ensuring compliance with data protection requirements.

10. Training and Awareness

All councillors, employees, and volunteers handling personal data will be made aware of this policy and given appropriate training.

New councillors and employees will receive data protection training during induction.

11. Data Protection Impact Assessments (DPIAs)

The Council will conduct DPIAs for new projects, systems, or processes that involve high-risk processing of personal data.

This ensures that privacy risks are identified and mitigated before implementation.

12. Roles and Responsibilities

- **The Parish Clerk is the Data Protection Officer (DPO)** and is responsible for:
 - Ensuring compliance with data protection law
 - Handling data subject requests
 - Managing data breaches
 - Keeping councillors informed of any changes in legislation

Contact:

Clerk to Swafeld and Bradfield Parish Council

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13. Review and Approval

This policy will be reviewed **annually** or earlier if required by changes in legislation or Council operations.

Approved by: Swafield and Bradfield Parish Council

Date of Adoption: 11th November 2025

Next Review Due: November 2026
