

Mancetter Parish Council

DOCUMENT CONTROL

Organisation	Mancetter Parish Council
Title	Data Protection Policy
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Creator	Jo-Anne Ambrose, Parish Clerk
Adopted	28 July 2026
Minute Reference	2026/035(a)
Last review Date	July 2026
Next Review date	May 2027

DATA PROTECTION POLICY 2026

Introduction

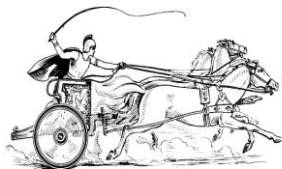
Mancetter Parish Council processes personal data in accordance with the Data Protection Act 2018 and the General Data Protection Regulation (GDPR).

The Council holds personal data relating to councillors, employees, residents, suppliers and other individuals in order to carry out its duties and provide services.

This policy explains how the Council collects, uses, stores and protects personal data and outlines the responsibilities of councillors and staff. The Clerk must ensure data protection legislation and best practice are considered before any new data processing activity begins.

Definitions

<i>Personal Data</i>	Any information relating to an identified or identifiable living individual.
<i>Data Subject</i>	The individual to whom the personal data relates.
<i>Processing</i>	Any activity involving personal data, including collection, storage, use, disclosure, or deletion.
<i>Data Controller</i>	The person or organisation that determines the purpose and means of processing personal data.
<i>Data Processor</i>	A person or organisation that processes personal data on behalf of the Data Controller.
<i>Sensitive Personal Data</i>	Personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic or biometric data, health information, sexual orientation, or criminal offence data.



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Council Purposes

The Council may process personal data for the following purposes:

- Compliance with legal and regulatory obligations
- Investigations or legal proceedings
- Ensuring council policies are followed
- Administrative and operational purposes
- Managing council services such as the cemetery, CCTV, allotments and farm tenancies
- Handling complaints
- Payroll and employment administration
- Ensuring safe working practices and access to council systems

Scope

This policy applies to all councillors and staff. Everyone covered by this policy must understand and comply with its requirements.

The policy may be updated from time to time and will operate alongside other council policies such as those covering email and internet use.

Data Protection Officer

Under the Data Protection Act 2018, certain public authorities must appoint a Data Protection Officer. However, parish councils are exempt from this requirement.

Mancetter Parish Council has therefore not appointed a Data Protection Officer.

Data Controller

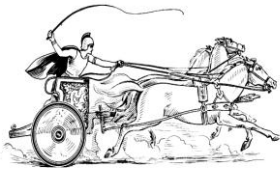
The Clerk acts as the Data Controller and is responsible for the day-to-day implementation of this policy.

Parish Clerk Contact Details

Mobile: 0738 648 4456

Postal Address: PO Box 7,171
Nuneaton
Warwickshire
CV11 9QD

Email: parishclerk@mancetterparishcouncil.gov.uk



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Responsibilities of the Data Controller

The Clerk is responsible for:

- Monitoring compliance with data protection legislation
- Reviewing policies and procedures regularly
- Providing advice and training on data protection
- Responding to data protection queries
- Managing subject access requests
- Ensuring appropriate security measures are in place
- Approving contracts with third parties that process council data
- Assessing new systems or services that process personal data

Lawful Basis for Processing

Personal data will only be processed where there is a lawful basis, including:

- Consent of the individual
- Performance of a contract
- Compliance with a legal obligation
- Protection of vital interests
- Carrying out a public task
- Legitimate organisational interests where these do not override the rights of the individual

Data Protection Principles

The Council will follow the six principles of data protection:

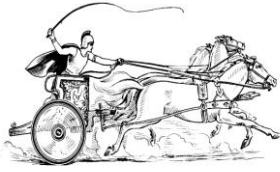
1. Lawfulness, fairness and transparency
2. Purpose limitation – data collected for specific purposes only
3. Data minimisation – only necessary data is collected
4. Accuracy – data is kept accurate and up to date
5. Storage limitation – data is not kept longer than necessary
6. Integrity and confidentiality – data is kept secure

Privacy Notices

The Council will provide privacy notices explaining how personal data is used.

Privacy notices will explain:

- What information is collected



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- Why it is collected
- How it will be used
- Who it may be shared with
- How long it will be kept
- Individuals' rights regarding their data
- Contact details for the Data Controller

Separate notices may be issued for staff, councillors and members of the public.

Sensitive Personal Data

Sensitive personal data will only be processed where there is a clear legal basis. In most cases explicit consent will be required unless processing is required by law.

Any consent obtained must clearly state:

- What data is being processed
- Why it is being processed
- Who it may be shared with

Accuracy and Relevance

Personal data must be accurate, relevant and not excessive for the purpose for which it was collected.

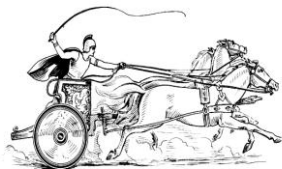
Individuals may request that inaccurate personal data is corrected.

Councillors and staff must ensure their own personal information held by the Council is kept up to date.

Data Security

Personal data must be protected against loss, misuse or unauthorised access. Security measures include:

- Secure storage of paper records
- Shredding documents when no longer required
- Password protection for computer systems
- Use of approved cloud storage services
- Regular data backups
- Security software and firewalls on council systems
- Avoiding storage of data on unsecured mobile devices



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Data Retention

Personal data will only be kept for as long as necessary and will be managed in accordance with the Council's data retention guidelines.

Subject Access Requests

Individuals have the right to request access to the personal data the Council holds about them.

Requests must be referred to the Clerk and will normally be processed within one month.

Individuals may also request that their data is transferred to another organisation where appropriate.

Right to Erase

Individuals may request that their personal data is deleted where appropriate. This request may be refused if the Council has a legal obligation to retain the data.

Privacy by Design

Privacy and data protection will be considered at the start of any new project or system involving personal data. The Clerk will ensure appropriate privacy safeguards are implemented.

Data Audit and Register

The Council will maintain a record of the personal data it holds, including:

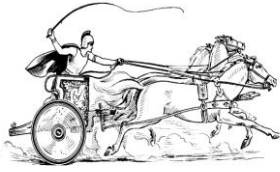
- What data is held
- Where it is stored
- How it is used
- Who is responsible for it
- Relevant retention periods

Regular reviews will be carried out to manage risks.

Reporting Data Breaches

All councillors and staff must report any actual or suspected data breaches.

The Council will:



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- Investigate the breach
- Take corrective action where necessary
- Maintain a record of incidents
- Notify the relevant supervisory authority if required

Further guidance is provided on the Information Commissioner's Office website.

Monitoring and Compliance

The Clerk will monitor compliance with this policy.

Failure to follow this policy may result in disciplinary action.

Any questions regarding this policy should be directed to the Clerk.