



DATA PROTECTION & PRIVACY POLICY (GENERAL DATA PROTECTION REGULATIONS (GDPR))

REVIEW AND AMENDMENT RECORD

Reviewer / Amender	Date	Amendments
Full Council	24 May 2023	Adopted
Fiona Richardson	21 Nov 2024	Amendments

Section	Change	Explanation
Introduction	Clarified the categorization of data (e.g., public data, confidential data, personal data).	Ensures clear distinction between different types of data handled by the Council.
Protecting Confidential Information	Strengthened language on compliance with GDPR principles (fair, lawful, transparent processing).	To align more closely with GDPR guidelines and ensure clearer legal compliance.
Data Protection Terminology	Minor adjustments to wording and clarity in the definitions (e.g., clarifying “Sensitive Data”).	Ensures accuracy in terminology, especially with respect to GDPR definitions.
Processing Personal Data	Added a clearer explanation of the conditions under which personal data is processed.	Clarifies compliance with GDPR conditions for lawful processing.
Responsibility for Data Protection	Added more specific language regarding the responsibility of the Clerk in data protection.	To ensure clear assignment of responsibility for data protection practices.
Rights of Data Subjects	Expanded on the rights of individuals to access, correct, and delete personal data.	To fully comply with the rights of data subjects as outlined in the GDPR.
Information Security	Updated to specify the use of MS365 Cloud for data storage and security measures.	To reflect the specific data storage and security practices currently in use.
Complaints	Added contact information for the Information Commissioner’s Office.	Ensures compliance with the requirement for individuals to know how to escalate complaints.

Reviewer / Amender	Date	Amendments
Publication Scheme	Added clarity on the Council's commitment to transparency and public access to information.	Strengthens the focus on transparency and public engagement.

Fiona Richardson 12 Nov 2025

Amendments

All **UK GDPR terminology updates throughout document**

Added **data breach reporting** sections

Clarified lawful bases, privacy notices, and retention schedule

Improved **accessibility and transparency wording Sections 12-14**

Contents

1. Introduction

- Halton Parish Council processes various types of data to perform its duties and services as a public authority. This data is categorized as follows:
 - **Public Data:** Information that is shared publicly, including details about services and operations.
 - **Confidential Information:** Sensitive data, such as developing ideas, policies, or commercially sensitive information.
 - **Personal Data:** Data concerning employees, councillors, volunteers, and individuals who contact the council for services or to make a complaint.
- The Council commits to managing and processing all data responsibly, respecting confidentiality, and ensuring compliance with the General Data Protection Regulation (UK GDPR).
- The Council will periodically review this policy, guided by the Information Commissioner's Office (ICO) and feedback from data subjects.

2. Protecting Confidential or Sensitive Information

- Halton Parish Council acknowledges the importance of protecting sensitive and personal information. In line with the UK GDPR, personal data will be processed fairly, lawfully, and transparently, and will only be collected for legitimate purposes.

- The UK GDPR principles will be followed:
 - Data will be processed lawfully, transparently, and for legitimate purposes.
 - Data will be relevant, accurate, and not excessive for the purposes for which it is collected.
 - Data will be kept for no longer than necessary and will be secured against unauthorized access, loss, or destruction.

3. Data Protection Terminology

- Data Subject: The individual whose personal data is being processed.
- Personal Data: Any information relating to an identified or identifiable individual (e.g., name, email, IP address).
- Sensitive Data: Data that includes racial or ethnic origin, political beliefs, medical information, etc.
- Data Controller: The entity (Halton Parish Council) that determines the purposes and means of processing personal data.
- Data Processor: An entity that processes data on behalf of the controller.
- Processing: Any operation performed on personal data, including collection, storage, and transmission.

4. Processing Personal Data

- Halton Parish Council processes personal data to:
 - Fulfil contractual obligations with employees and third parties.
 - Conduct surveys, research, and audits.
 - Ensure the safety and security of premises.
 - Communicate with individuals contacting the Council.
- The Council will ensure that at least one of the following conditions is met before processing personal data:
 - The individual has consented to the processing.
 - The processing is necessary for a contract.

- The processing is required by law.
- The processing is necessary for the performance of a public task.

5. Responsibility for Data Protection

- The Council has ultimate responsibility for data protection. The day-to-day responsibility is delegated to the Clerk as Data Protection lead, whose contact information is provided.

6. Diversity Monitoring

- The Council monitors diversity to ensure there is no unlawful discrimination in its activities. Diversity data will only be used for monitoring purposes and will be anonymized where possible.

7. Rights of Data Subjects

- Data subjects have several rights under the UK GDPR:
 - Access: The right to request access to personal data held by the Council.
 - Correction: The right to correct inaccurate or incomplete data.
 - Deletion: The right to request the deletion of personal data.
 - Objection: The right to object to the processing of personal data.
- The Council does not use automated decision-making or profiling of personal data.

8. Information Security

- The Council implements appropriate technical and organizational measures to protect personal data from unauthorized access, loss, or destruction. Data will only be kept for as long as necessary, after which it will be deleted.

9. Children's Data

- No personal data will be processed for individuals under 13 years of age without parental consent.

10. Complaints

- If an individual believes that their personal data has been processed incorrectly, they may lodge a complaint with the Clerk or with the Information Commissioner's Office (ICO).

11. Publication Scheme and Transparency

- The Council is committed to transparency and provides information to the public through its Publication Scheme, as required by the Freedom of Information Act 2000. The Council will make records of decisions and meeting minutes available to the public, ensuring transparency in its operations.

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Publication Scheme and Transparency

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Data Breach Reporting

12. Halton Parish Council will maintain a clear process for reporting personal data breaches. Where a breach is likely to result in a risk to individuals' rights and freedoms, the Council will report it to the Information Commissioner's Office (ICO) within 72 hours, in line with Article 33 of the UK GDPR.

13. Document Retention and Disposal

- All personal data will be retained and disposed of according to the Council's Document Retention and Disposal Schedule, in line with NALC and SLCC guidance.

14. Privacy Notices

- The Council will issue privacy notices whenever personal data is collected directly from individuals, and these notices will be made available on the Council's website.

15. Accessibility

- This policy is available in alternative formats on request to ensure accessibility and inclusion for all residents.