Halton Parish Council

Data Protection & Privacy Policy (UK GDPR)

Version 2 – Adopted 12 November 2025

Reviewed by Full Council and Adopted 24 May 2023

Reviewed and updated Nov 2024

Reviewed and updated Nov 2025

Updated to ensure compliance with UK GDPR, the Data Protection Act 2018, SLCC/NALC model policy guidance, and ICO recommended best practice.

Nov 2025 Summary of Amendments

- Updated references from EU GDPR to UK GDPR and Data Protection Act 2018.
- Added requirement to report personal data breaches to the ICO within 72 hours where applicable.
- Clarified lawful bases for processing personal data.
- Added statement confirming the Council's use of Microsoft 365 (UK data processing compliance).
- Added reference to Data Retention Schedule.
- Updated terminology and tightened wording for clarity and accuracy.
- Updated terminology to UK GDPR and the Data Protection Act 2018.
- Confirmed secure data storage using Microsoft 365 and Scribe Accounts.
- Added explicit lawful bases for processing under Article 6.
- Added data breach notification requirement (ICO notice within 72 hours).
- Added reference to Council's Data Retention Schedule.
- Updated DBS / Disclosure Information handling and retention rules.
- Inserted Council Publication Scheme wording (available via website).
- Added Local Government Transparency Code compliance section.
- Clarified councillor responsibilities: use of official email accounts only.
- Prohibited the storage of personal data in WhatsApp and social media platforms.
- Added a clear SAR (Subject Access Request) rights statement.

1. Introduction

Halton Parish Council collects and processes personal data in order to perform its lawful functions as a public authority. This policy explains how personal data is handled in compliance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

2. Data Protection Principles

The Council ensures that all personal data is:
• Processed lawfully, fairly and transparently;
• Collected for specified, explicit and legitimate purposes;
• Adequate, relevant and limited to what is necessary;
• Accurate and kept up to date;
• Retained only for as long as necessary;
• Processed securely.

3. Lawful Basis for Processing Personal Data

The Council processes personal data under the following lawful bases:
• Public Task – to perform statutory functions and deliver services;
• Legal Obligation – to comply with legislation, financial controls and audit;
• Contract – where processing is necessary for an employment or supplier contract;
• Consent – only where no other lawful basis applies and consent is freely given.

4. Data We Handle

The Council may process:
• Personal contact details;
• Correspondence and consultation responses;
• Employee and councillor role-related information;
• Supplier and financial records;
• Hall Booking enquiries and hirers
• Complaints and service requests;
• Only the minimum amount of data required for each purpose.

5. Data Storage and Security

Personal data is stored securely using:
• Microsoft 365 (email, documents and governance records);
• Scribe Accounts (financial records);
• Password-protected storage with access controls.

Councillors and staff must use their Council-provided email accounts for all Council business.

6. Sharing Personal Data

The Council will not sell personal data. Personal data may be shared only with:
• Regulatory bodies (e.g., auditors, HMRC);
• Contractors working on behalf of the Council when necessary;

• Other public authorities where required by law.
Personal data will not be shared for marketing or profiling.

7. Data Breaches

Any suspected personal data breach must be reported immediately to the Clerk. Where a breach is likely to result in a risk to individuals, the Clerk will notify the Information Commissioner's Office within 72 hours and maintain a breach log.

8. Data Retention and Disposal

Personal data is retained in accordance with the Council's Data Retention Schedule and securely deleted when no longer required.

9. Publication Scheme (Freedom of Information Act 2000)

The Council adopts the ICO Model Publication Scheme. Information routinely published is available on the Council website at https://halton-pc.gov.uk or on request from the Clerk.

10. Local Government Transparency Code

The Council publishes:
• Expenditure over £500;
• Details of contracts over £5,000;
• Land and building asset register;
• Councillor roles and declarations of interest;
• Annual governance and accounting statements.
Confidential and personal data will not be published.

11. DBS / Disclosure Information

DBS checks are only undertaken where required by law. Disclosure information is:
• Stored securely;
• Access restricted to authorised officers;
• Not held longer than six months;
• Disposed of securely and confidentially.

12. Subject Access Requests (SARs)

Individuals have the right to request access to their personal data. Requests must be submitted to the Clerk and will be responded to within one calendar month. Third party data will be redacted.

13. Contact Details

Clerk to Halton Parish Council
Email: clerk@halton-pc.gov.uk
Website: https://halton-pc.gov.uk