

RUNWELL PARISH COUNCIL

INFORMATION & DATA PROTECTION POLICY

ADOPTED: 2nd March 2026 Minute 185-26/03



1. Introduction

In order to conduct its business, services and statutory duties, Runwell Parish Council processes a wide range of information and data relating to its own operations and, in some cases, information handled on behalf of partners.

In broad terms, this data can be classified as:

- Information shared in the public domain about the services the Council provides and its governance.
- Confidential information and draft documents not yet in the public domain.
- Commercially sensitive information relating to suppliers and contractors.
- Personal data relating to current, former and prospective employees, Councillors and volunteers.
- Personal data relating to residents and individuals who contact the Council to access services, hire facilities, submit complaints, or make enquiries.

Runwell Parish Council is committed to managing data responsibly and in accordance with the law. The Council respects the confidentiality of its own information, that of partner organisations, and that of members of the public.

This policy will be reviewed periodically in line with legislation, guidance from the Information Commissioner's Office (ICO), and operational experience.

2. Legal Framework

This policy operates within the framework of:

- UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- Freedom of Information Act 2000
- Openness of Local Government Bodies Regulations 2014
- Local Government transparency requirements

3. Principles of Data Protection

Personal data must be:

- 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 using appropriate technical and organisational measures.

4. Definitions

Personal Data – Any information relating to an identifiable living individual (e.g. name, address, email, phone number, IP address).

Special Category Data – Data requiring higher protection, including racial or ethnic origin, political opinions, religious beliefs, health information, sexual orientation, genetic or biometric data, and criminal convictions data.

Data Subject – The individual whose personal data is being processed.

Data Controller – The organisation that determines how and why personal data is processed.

Runwell Parish Council is the Data Controller.

Data Processor – A person or organisation that processes data on behalf of the Council.

5. Lawful Processing

Runwell Parish Council processes personal data in order to:

- Fulfil its statutory duties and public functions.
- Comply with employment law and contractual obligations.
- Maintain financial records and accounts.
- Administer Council facilities and services.
- Manage allotments, hall bookings, and community events.
- Respond to enquiries and complaints.
- Promote transparency and good governance.
- Protect public funds and prevent fraud.

Processing will only occur where one of the following lawful bases applies:

- Consent
- Contract
- Legal obligation
- Public task
- Legitimate interests
- Vital interests (in limited circumstances)

Special category data will only be processed where additional legal conditions are met.

6. Information Security

Runwell Parish Council ensures that:

- Electronic data is password protected and stored securely.
- Paper records are stored securely and accessed only by authorised persons.
- Personal data is protected against loss, unauthorised access, alteration or disclosure.
- Data breaches are reported and handled in accordance with ICO guidance.

Personal data will not be transferred outside the UK or EEA unless appropriate safeguards are in place.

7. Retention and Disposal

The Council retains data only for as long as necessary and in accordance with legal and operational requirements.

When data is no longer required, it will be securely destroyed or permanently deleted.

8. Rights of Individuals

Individuals have the right to:

- Access their personal data.
- Request correction of inaccurate data.
- Request deletion (where legally permitted).
- Object to processing.
- Restrict processing in certain circumstances.
- Lodge a complaint with the Information Commissioner's Office.

Requests should be made in writing to the Parish Clerk.

9. Transparency and Publication

Runwell Parish Council is committed to openness and transparency.

The Council:

- Operates a Publication Scheme in accordance with the Freedom of Information Act 2000.
- Publishes agendas and supporting documents at least three clear days before meetings.
- Publishes approved minutes within one month.

- Makes financial information publicly available in line with statutory requirements.
- Allows recording of public meetings in accordance with legislation, provided it is not disruptive.

Certain matters may be considered in confidential session where legally justified (e.g., staffing or commercially sensitive matters).

10. Children's Data

The Council will not knowingly process personal data relating to children under the age of 13 without parental or guardian consent.

11. Disclosure and Barring Service (DBS)

Where appropriate, the Council will undertake DBS checks in accordance with legal requirements and ensure secure handling of disclosure information.

12. Data Transparency

The Council complies with statutory transparency requirements and will publish required financial and governance information on its website:

www.runwellparishcouncil.gov.uk

This includes (where applicable):

- Annual Governance Statements
- Internal audit reports
- Councillor responsibilities
- Asset registers
- Meeting agendas and minutes

13. Responsibility

Runwell Parish Council, as a corporate body, holds overall responsibility for compliance with data protection legislation.

Day-to-day responsibility is delegated to the Parish Clerk.

14. Contact Details

For all data protection matters, subject access requests, or complaints:

Runwell Parish Council

Email: clerk@runwellparishcouncil.gov.uk

Website: www.runwellparishcouncil.gov.uk