

Granborough Parish Council

Information & Data Protection Policy

Adopted: 22nd May 2018; updated 24th July 2025

1. Introduction

To conduct its business, services and duties, Granborough Parish Council processes a wide range of data, relating to its own operations and some which it handles on behalf of partners. This data can be classified as:

- Data shared in the public arena about the services it offers, its mode of operations and information it is required to make available to the public.
- Confidential information and data not yet in the public arena such as ideas or policies in development.
- Confidential information about other organisations because of commercial sensitivity.
- Personal data concerning current, past and potential employees, Councillors, and volunteers.
- Personal data concerning individuals who contact the Council for information, to access services or facilities, or to make a complaint.

Granborough Parish Council is a Data Controller and manages all data responsibly, respecting the confidentiality of both its own data and that belonging to partner organisations and members of the public. This Policy is linked to the Council's Data Retention Policy and will be reviewed periodically considering experience, feedback, and guidance from the Information Commissioner's Office.

2. Protecting Confidential or Sensitive Information

The Council recognises its duty to keep and process sensitive and personal information responsibly. The UK GDPR (retained from the EU GDPR) and Data Protection Act 2018 establish that personal data must be:

- Processed fairly, lawfully and transparently.
- Collected for specified, explicit and legitimate purposes.
- Adequate, relevant and limited to what is necessary.
- Accurate and kept up to date.
- Retained no longer than necessary.
- Processed securely against unauthorised or unlawful processing, accidental loss or damage.

Granborough Parish Council processes data to:

- Fulfil duties as an employer and a public body.
- Maintain compliance with statutory obligations.
- Monitor activities, equality, and diversity compliance.
- Assist regulatory or law enforcement agencies.
- Manage information about Councillors, employees, volunteers, and residents.
- Conduct surveys, research, and audits.
- Support Council administration.

Processing will only occur when at least one lawful basis applies: consent, contract, legal obligation, vital interests, public functions, or legitimate interests balanced with individual rights.

3. Diversity Monitoring

The Council operates an equal opportunities policy to ensure no discrimination in its activities. Diversity data is used solely for monitoring and never for selection or shared externally. Guidance on personnel data and individual rights is provided through the Privacy Notice. Appropriate technical and organisational measures protect personal data, and data is not transferred outside the UK/EEA unless adequate safeguards exist.

4. Information Provided to Us

Personal information provided to the Council (such as name, address, email, or phone number) will be processed and stored to allow contact, response, or completion of the requested transaction. By transacting with the Council, individuals consent to this use; however, written consent will be sought where appropriate. Individuals are responsible for keeping their data accurate and up to date. Information will not be shared with third parties or used for other purposes.

5. The Council's Right to Process Information

Under the UK GDPR and Data Protection Act 2018, Article 6 (1) (a), (b) and (e), processing is lawful when it is:

- With the consent of the data subject;
- Necessary for compliance with a legal obligation; or
- Necessary for the legitimate interests of the Council, except where overridden by individual rights.

6. Information Security

The Council ensures that all personal data is protected from unauthorised access, loss, manipulation, destruction, or disclosure using appropriate technical and organisational measures. Data is retained only for its intended purpose and deleted when no longer required.

7. Children

The Council will not knowingly process data relating to a child (under 13) without express parental or guardian consent.

8. Rights of a Data Subject

Individuals have the following rights under UK GDPR:

- Access – request access to information held about them.
- Correction – request updates or amendments.
- Deletion – request erasure of their data.
- Objection – object to processing for an unintended purpose.

All such requests should be sent to: clerk@granborough.org

9. Automated Decision Making and Profiling

Granborough Parish Council does not use any form of automated decision making or profiling of personal data.

10. Complaints

Concerns about data processing can be sent to clerk@granborough.org or the Information Commissioner's Office (casework@ico.org.uk | 0303 123 1113). The Council requests an opportunity to resolve issues directly before escalation.

11. Making Information Available

Council and committee meetings are publicly advertised and open to residents and press. Agendas, reports, and minutes are published on the Council website. The public may participate in meetings through the Open Forum for Parishioners. Certain matters may occasionally be discussed in private, such as staffing or commercially sensitive issues, following a formal resolution. Confidential minutes are retained securely.

The Council complies with the Openness of Local Government Bodies Regulations 2014, ensuring decisions made under delegated authority are recorded and made available. Filming, photography, and audio recording at meetings are permitted provided they are non-disruptive, and the Council will safeguard children and vulnerable individuals. Special arrangements can be made for those with accessibility needs or language barriers.

12. Disclosure Information

The Council undertakes necessary checks and complies with its Code of Conduct regarding the secure handling, use, and disposal of Disclosure information.

13. Data Transparency

The Council follows the Code of Recommended Practice for Local Authorities on Data Transparency (September 2011), ensuring openness, accountability, and publication of public data. Key principles include being demand-led, open, and timely. Although the Council exceeds the £25,000 turnover threshold for mandatory transparency, it voluntarily publishes the following information online:

- All transactions above £100 (within the Minutes)
- End of year accounts
- Annual Governance Statements
- Internal Audit Reports
- List of Councillor responsibilities
- Details of public land and building assets (none held)
- Draft minutes within one month
- Agendas and supporting papers at least three clear days before meetings.