

HOLLYM PARISH COUNCIL

Contact: Clerk, Rachel Foster

Phone: 07730691410 or Email: clerk@hollym-pc.gov.uk

Data Protection, Confidentiality and Transparency Policy

(UK GDPR & NALC Aligned)

1. Introduction

Hollym Parish Council (“the Council”) processes information to carry out its statutory functions, services and duties. This includes information relating to Council operations and, in some cases, information shared with partner organisations.

The Council is committed to:

- Lawful, fair and transparent processing of information
- Protecting personal and confidential data
- Openness and accountability in decision-making
- Compliance with all relevant legislation and guidance

This policy is written in accordance with:

- UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- Freedom of Information Act 2000
- Local Government Act 1972
- Localism Act 2011
- Openness of Local Government Bodies Regulations 2014
- ICO and NALC guidance

2. Types of Data Processed

The Council processes:

- Public information – published information about services, meetings, decisions, policies and finances
- Confidential business information – including draft policies and commercially sensitive material
- Confidential third-party information – relating to contractors and partner organisations
- Personal data relating to current, former and prospective:
 - Employees
 - Councillors
 - Volunteers
- Personal data of members of the public, including those who contact the Council, use services or submit complaints

3. Council Commitment

The Council will:

- Collect only necessary and relevant data
- Keep data accurate and up to date
- Store data securely
- Retain data only for as long as necessary

This policy will be reviewed periodically to reflect:

- Legislative changes
 - ICO guidance
 - Feedback from data subjects
-

HOLLYM PARISH COUNCIL

Contact: Clerk, Rachel Foster

Phone: 07730691410 or Email: clerk@hollym-pc.gov.uk

4. Data Protection Principles

All personal data will be processed in accordance with UK GDPR principles. Data must be:

- Lawful, fair and transparent
- Collected for specific and legitimate purposes
- Adequate, relevant and limited
- Accurate and kept up to date
- Retained only as long as necessary
- Processed securely

5. Definitions

- Data Subject – the individual whose data is processed
- Personal Data – information identifying a living person
- Special Category Data – data revealing racial or ethnic origin, political opinions, religious beliefs, trade union membership, health, sexual orientation, genetic or biometric data
- Data Controller – Hollym Parish Council
- Data Processor – a third party processing data on behalf of the Council
- Processing – any operation performed on data, including collection, storage, use, disclosure or deletion

6. Lawful Bases for Processing

Personal data will only be processed where at least one Article 6 UK GDPR condition applies:

- Consent
- Contract
- Legal obligation
- Vital interests
- Public task
- Legitimate interests

For Special Category Data, an Article 9 UK GDPR condition will also apply, such as:

- Explicit consent
- Employment law obligations
- Protection of vital interests

7. Purposes for Processing

The Council processes personal data to:

- Fulfil its duties as an employer
- Carry out statutory and public functions
- Manage Council administration and governance
- Maintain contact details for Councillors, employees and volunteers
- Respond to enquiries, complaints and service requests
- Monitor equality and diversity (anonymised where possible)
- Ensure security of premises and assets
- Undertake research, audit and service improvement

HOLLYM PARISH COUNCIL

Contact: Clerk, Rachel Foster

Phone: 07730691410 or Email: clerk@hollym-pc.gov.uk

8. Responsibility for Data Protection

The Council has overall responsibility for data protection compliance.

Day-to-day responsibility is delegated to the Parish Clerk / Data Protection Lead:

Email: clerk@hollym-pc.gov.uk

Telephone: 07730 691410

9. Diversity Monitoring

Diversity data is collected solely to:

- Monitor equality
- Prevent discrimination

This data is confidential, accessed only by authorised persons, not used in decision-making, and anonymised for reporting.

10. Information Security and Retention

Appropriate technical and organisational measures are used to protect data from unauthorised access, loss or unlawful processing.

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

11. Children's Data

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

12. Rights of Data Subjects

Individuals have the right to:

- Access their personal data
- Rectify inaccurate data
- Request deletion (where legally permitted)
- Object to processing
- Restrict processing
- Data portability (where applicable)

Requests should be made to the Parish Clerk and will be handled within statutory timescales.

13. Complaints About Data Handling

Complaints may be made to:

- The Parish Clerk, or
- Information Commissioner's Office (ICO)
 - Email: casework@ico.org.uk
 - Tel: 0303 123 1113

14. Freedom of Information and Publication Scheme

The Council operates a Publication Scheme under the Freedom of Information Act 2000, based on the statutory model for local councils.

This includes information on:

- Meetings

HOLLYM PARISH COUNCIL

Contact: Clerk, Rachel Foster

Phone: 07730691410 or Email: clerk@hollym-pc.gov.uk

- Policies
- Accounts
- Governance

15. Open Meetings and Transparency

- All formal meetings are open to the public and press
- Agendas and papers are published at least three clear working days in advance
- Draft minutes are published within one month

The public may only be excluded by formal resolution where confidential or exempt matters are discussed.

16. Recording and Filming of Meetings

In accordance with the Openness of Local Government Bodies Regulations 2014, meetings open to the public may be recorded, provided this is not disruptive.

17. Data Transparency

In line with the Code of Recommended Practice on Data Transparency, the Council publishes:

- Transactions over £100
- Annual accounts and governance statements
- Internal audit reports
- Councillor responsibilities
- Land and asset register
- Agendas, papers and minutes

18. Disclosure and Barring Service (DBS)

Where required, DBS checks will be carried out in line with DBS guidance, with secure handling, storage and disposal of disclosure information.

19. Review and Adoption

This policy will be reviewed regularly and at least every four years.

Formal Resolution for Adoption

Resolved:

That Hollym Parish Council adopts the Data Protection, Confidentiality and Transparency Policy as presented.

Adopted on: _____

Minute Reference: _____

Signed: _____ (Chair)

Next Review Due: January 2030