

Wilberfoss Parish Council - Data Protection Policy

Wilberfoss Parish Council will keep the minimum of personal data.

The seven principles of GDPR are essential guidelines for processing personal data, ensuring that organisations handle data lawfully, transparently, and securely.

The Seven Principles

1. **Lawfulness, Fairness, and Transparency:** Personal data must be processed lawfully, fairly, and in a transparent manner. Organisations must have a valid legal basis for processing data and must inform individuals about how their data is used.
2. **Purpose Limitation:** Data should only be collected for specified, legitimate purposes and not further processed in a way that is incompatible with those purposes. This principle prevents "function creep," where data is used for purposes beyond what was originally intended.
3. **Data Minimisation:** Organisations should only collect personal data that is adequate, relevant, and limited to what is necessary for the purposes of processing. This principle encourages minimal data collection to reduce risks associated with data breaches.
4. **Accuracy:** Personal data must be accurate and kept up to date. Organisations are required to take reasonable steps to ensure that inaccurate data is erased or rectified without delay.
5. **Storage Limitation:** Personal data should be kept in a form that allows identification of data subjects for no longer than necessary for the purposes for which the data is processed. Once the data is no longer needed, it should be securely deleted or anonymised.
6. **Integrity and Confidentiality (Security):** Organisations must process personal data in a manner that ensures appropriate security, protecting against unauthorised or unlawful processing and against accidental loss, destruction, or damage.
7. **Accountability:** Data controllers are responsible for demonstrating compliance with the GDPR principles. This includes maintaining records of processing activities and being able to show that they adhere to the principles.

2. General provisions

- a. This policy applies to all personal data processed by Wilberfoss Parish Council.
- b. This policy shall be reviewed at least every three years, or earlier if legislation changes.
- c. No personal data on those aged under 18 is kept.

3. Lawful, fair and transparent processing

- a. To ensure its processing of data is lawful, fair and transparent, Wilberfoss Parish Council shall review emails every six months
- b. Individuals have the right to access their personal data and any such requests made to the charity shall be dealt with in a timely manner.

4. Lawful purposes

- a. All data processed by Wilberfoss Parish Council must be done on one of the following lawful bases: consent, contract, legal obligation, vital interests, public task or legitimate interests. In practice this means that Wilberfoss Parish Council has access to personal details of serving Councillors, Contractors and Volunteers.

5. Data minimisation

- a. Wilberfoss Parish Council shall ensure that personal data collection is adequate, relevant and limited to what is necessary in relation to the purposes for which it is processed. The data collected comprises personal information given by Councillors, Contractors and Volunteers. Councillors are provided with a dedicated .gov.uk email address which is rescinded upon resignation.

6. Accuracy

- a. Wilberfoss Parish Council shall take reasonable steps to ensure personal data is accurate.
- b. Where necessary for the lawful basis on which data is processed, steps shall be put in place to ensure that personal data is kept up to date.

7. Archiving / removal

- a. To ensure that personal data is kept for no longer than necessary, Wilberfoss Parish Council will review the data held every six months.
- b. Contractor details will be kept for five years then destroyed
- c. Outgoing staff details will be kept for 3 years then destroyed.

8. Security

- a. Wilberfoss Parish Council will store electronic personal data Office 365 Cloud storage.
- b. Access to personal data shall be limited to the Clerk and, where necessary Councillors.
- c. When personal data is deleted this should be done safely such that the data is irrecoverable.

9. Breach

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, the Parish Council shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the Information Commissioner's Office (ICO.org.uk).

Responsible person: Sarah Wills

Date written: 20th January 2026

Review: 20th January 2029

Register of Systems:

What kept	Where kept	What purpose	How long for	Consent obtained
Councillors name, address, dob, tel no, financial and legal information	Password-protected laptop	Fulfil requirements of the role of a Councillor	Until a Councillor is no longer in role	Yes
Staff name, address, dob, tel no, financial and legal information	Password-protected laptop	Fulfil requirements of the role of the Clerk.	Until the Clerk is no longer in post.	
Contractor personal data for maintenance activity	Password-protected laptop	Contractual purposes	Five years	
Minutes and annual reports	Paper copy with Parish Clerk, copy uploaded to Parish Council website, copy on Password-protected laptop	Manage the Council	Five Years	Not required as legitimate interest