



Barrowby Parish Council

Email: clerk@barrowbyparishcouncil.gov.uk

Address: Reading Room, Church Street, Barrowby, NG32 1BX

Website: <https://barrowby.parish.lincolnshire.gov.uk>

Data Protection Policy

Document control

- **Owner:** Assistant Clerk
- **Lead officer for data protection:** Assistant Clerk
- **Oversight:** Clerk / Proper Officer
- **Adopted:** 11.05.2026 (Minute ref: 8e [26/008])
- **Version:** 2026.1
- **Review:** Annually or earlier if legislation/guidance changes
- **Next review due:** January-March 2027 at Full Council for formal adoption at Parish Council May 2027

1. Purpose

Barrowby Parish Council is committed to processing personal data lawfully, fairly, transparently and securely, in accordance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, and associated guidance issued by the Information Commissioner's Office (ICO).

This policy explains the Council's approach to data protection and applies to all personal data processed by or on behalf of the Council.

2. Scope

This policy applies to:

- councillors;
- employees;
- contractors;
- volunteers and working group members where they process personal data on the Council's behalf; and
- any third party processor acting for the Council.

It applies to personal data held in electronic, paper, photographic, audio, CCTV, or any other format.

3. Status of the Council

Barrowby Parish Council is the **data controller** for the personal data it decides to collect and use for its council functions.

The Council will identify and document an appropriate lawful basis before processing personal data and will provide privacy information to individuals in line with UK GDPR requirements.

4. Data protection principles

The Council will comply with the data protection principles by ensuring personal data is:

1. processed lawfully, fairly and transparently;
2. collected for specified, explicit and legitimate purposes and not further processed incompatibly with those purposes;
3. adequate, relevant and limited to what is necessary;
4. accurate and, where necessary, kept up to date;
5. kept for no longer than necessary;
6. processed securely, with appropriate technical and organisational measures; and
7. processed in a way that enables the Council to demonstrate compliance.

5. Lawful bases

The Council will only process personal data where there is a lawful basis under Article 6 UK GDPR.

For parish council work, the most common lawful bases are likely to be:

- **public task** — where processing is necessary for the Council's official functions;
- **legal obligation** — where processing is required by law;
- **contract** — where processing is necessary for a contract or steps requested before entering into one;
- **legitimate interests** — where applicable and appropriate; and
- **consent** — only where the individual has a genuine choice and consent is appropriate.

The Council will not use consent where another more appropriate lawful basis applies.

Where special category data is processed, the Council will also identify an appropriate condition under Article 9 UK GDPR / Schedule 1 Data Protection Act 2018.

6. Transparency and privacy information

The Council will provide clear privacy information explaining:

- who it is;
- what personal data it collects;
- why it uses it;
- the lawful basis relied upon;
- who it may share data with;
- how long it keeps it;
- the rights available to individuals; and
- how to complain to the ICO.

The Council may use layered privacy notices where appropriate.

7. Individual rights

The Council will respect and respond appropriately to data subject rights, including:

- the right to be informed;
- the right of access;
- the right to rectification;
- the right to erasure, where applicable;
- the right to restrict processing;
- the right to object;
- the right to data portability, where applicable; and
- rights relating to automated decision-making, where applicable.

Requests will be handled in accordance with legal timescales and relevant exemptions.

8. Data quality and minimisation

The Council will only collect information it genuinely needs for the stated purpose and will take reasonable steps to keep records accurate and up to date.

Councillors, staff and volunteers must notify the Clerk if records need correcting.

9. Data sharing

The Council may share personal data where there is a lawful basis to do so, including with professional advisers, contractors, partner public bodies, regulators, insurers, auditors, payroll providers, IT providers, and law enforcement agencies where appropriate.

Personal data will not be shared informally or unnecessarily.

Where the Council uses third party service providers to process personal data on its behalf, it will ensure appropriate contractual and security arrangements are in place.

10. International transfers

The Council does not routinely transfer personal data outside the UK. Where this becomes necessary, it will ensure an appropriate safeguard is in place.

11. Information security

The Council will take proportionate technical and organisational measures to protect personal data, including where appropriate:

- password protection and multi-factor authentication;
- controlled access to council accounts and records;
- secure storage of paper records;
- encryption and secure backup arrangements where available;
- appropriate use of council and personal devices;
- prompt removal or restriction of access when roles change; and
- secure disposal of records and equipment.

All councillors, staff and volunteers handling personal data must follow the Council's IT, records management and confidentiality requirements.

12. Retention and disposal

The Council will maintain and follow a **Records Retention Schedule** and will not keep personal data for longer than necessary.

Records selected for permanent historical retention will be handled separately from routine disposal.

13. Personal data breaches

Any actual or suspected personal data breach must be reported immediately to the Assistant Clerk as the Council's lead officer for data protection. If the breach involves the Assistant Clerk, or if they are unavailable, it must be reported to the Clerk / Proper Officer or, where necessary, the Chair.

14. Roles and responsibilities

Barrowby Parish Council is the **data controller** and retains overall responsibility for compliance with data protection law.

The **Assistant Clerk** is the Council's nominated **lead officer for data protection** and is responsible for coordinating day-to-day data protection compliance, including:

- maintaining and reviewing data protection procedures and related records;
- coordinating responses to data subject rights requests;
- coordinating the Council's response to actual or suspected personal data breaches;
- maintaining appropriate privacy notices, retention arrangements and data protection documentation; and
- acting as the first point of internal contact on routine data protection matters.

The **Clerk / Proper Officer** retains overall managerial oversight and will support escalation, governance reporting and implementation across the Council.

All councillors, staff, contractors and volunteers who process personal data on behalf of the Council must comply with this policy and report any concerns without delay.

The Council has not designated this internal lead role as a statutory Data Protection Officer.

15. Training and awareness

The Council will ensure that those handling personal data receive appropriate training and guidance relevant to their role.

16. Related documents

This policy should be read alongside the Council's:

- Privacy Notice(s)
- Records Retention Schedule
- Data Breach Response Plan

- IT Policy
- Social Media Policy
- CCTV Policy and CCTV Privacy Notice
- Freedom of Information / EIR procedures where applicable

17. Review

This policy will be reviewed at least annually and sooner if legislation, ICO guidance, or council practice changes.

18. Contact

For questions about this policy or about how Barrowby Parish Council handles personal data, please contact:

Assistant Clerk

Lead officer for data protection

Barrowby Parish Council

Reading Room, Church Street, Barrowby, NG32 1BX

Email: assistantclerk@barrowbyparishcouncil.gov.uk

General council correspondence may also be sent to:

Clerk / Proper Officer

Email: clerk@barrowbyparishcouncil.gov.uk

ICO Registration Number: ZA102129

If an individual is unhappy with how their personal data has been handled, they may also complain to the Information Commissioner's Office.