**Data Protection Policy**

**June 2018**

**This policy is distinct from the Council's Privacy Policy, which can be found on any data collection forms issued.**

# General Provisions

### Responsibility

As a small Parish Council we do not need to appoint a Data Protection Officer, but the **Responsible Officer** has overall responsibility for data protection compliance.

### Review

This policy is regularly reviewed by the annually, following the AGM and the date of the latest review is shown below.

### Data definition

Data covered by the policy consists of all personal data for Councillors and any correspondents, stored by the Clerk and by individual Councillors

### Breach reporting

If there is a breach in data security, the Responsible Officer will contact the ICO to take procedural advice.

# Lawful, fair and transparent processing

### Data audit

Data storage and audit is managed on the whole by the Clerk. However, individual Councillors may need to maintain their own contacts list and correspondence files and will be responsible for data audit and management compliance with regard to these. They will be made aware of their responsibilities in this regard and will be required to complete a check list and declaration on their election or appointment and at each policy review.

### Disclosure

If an individual makes a personal data disclosure request, this will be acknowledged immediately by the Responsible Officer and an estimate of investigation time will be provided to the enquirer. Councillors will then be polled for relevant details held individually; their responses will be collated and a copy provided to the enquirer without charge, in like for like format (i.e. if requested by email, the response will be by email; if requested by letter, response will be by letter, etc.)

# Data Collection

## Purpose limitations & Data minimisation

Only necessary contacts with explicit permission to store and use them will be collected from members of the public; they will also be made aware that such permission may be withdrawn at any time. Contact details from incoming correspondence will be held without an explicit permission request during the relevant enquiry period. Beyond that time, such contacts will form part of the regular data audit reviews.

Data collected will be used only for the purpose of Council business as specified by law and for communication between members of the Council, each other and correspondents. Permission to hold private contact data beyond completion of an enquiry will be explicitly requested and recorded.

## Accuracy

Regular data audits by the Responsible Officer and individual Councillors will ensure data accuracy.

## Storage limitations

Data will not be stored beyond its relevance to an ongoing project or enquiry, unless specific permission for this has been granted. A contacts audit will be performed by the Responsible Officer in advance of each scheduled review of this policy. For Councillors with individual contact lists and correspondence files, permissions will be required to be self-audited and updated at least by bi-annually.

## Integrity and confidentiality

The CPC Office computer is Internet and password protected and a weekly over-writing back up is in place. Councillors must agree to the provisions of this policy and confirm that their home systems and devices are Internet and password protected and that a regular (at least monthly) over-writing back up is in place.


Policy Adopted: (Date) _____

Latest Policy Review: (Date) _____

# Councillor GDPR Compliance Declaration:

☑ I am familiar with Coughton Parish Council's GDPR Policy and I understand my responsibilities with regard to data protection as a member of the Council

☑ I manage my own contacts list and data storage: I understand that I am responsible for my compliance with General Data Protection Regulations in relation to this.

☑ I agree to self-audit my contact lists and stored data to keep them updated, accurate and relevant, at least bi-annually.

☑ My home computer system is Internet and password protected; my data is regularly backed up.

| Name | Date | Signature |
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