

Appleby Parish Council Data Protection / GDPR Policy

Introduction

Appleby Parish Council needs to gather and use certain information about individuals.

These can include our users, volunteers and other people the organisation has a relationship with or may need to contact.

This policy describes how this personal data must be collected, handled and stored to meet the organisation's data protection standards and to comply with the law.

Data protection law

The General Data Protection Regulation and the Data Protection Act 2018 are underpinned by eight important principles. These say that personal data must:

1. Be processed fairly and lawfully
2. Be obtained only for specific, lawful purposes
3. Be adequate, relevant and not excessive
4. Be accurate and kept up to date
5. Not be held for any longer than necessary
6. Processed in accordance with the rights of data subjects
7. Be protected in appropriate ways

Policy scope

This policy applies to:

- All users and volunteers, contractors, suppliers and other people working on behalf of Appleby Parish Council

It applies to all data that Appleby Parish Council holds relating to identifiable individuals, even if that information technically falls outside of the General Data Protection Regulation and the Data Protection Act 2018. This can include:

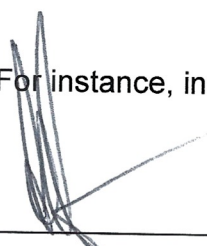
- Names of individuals
- Postal addresses
- Email addresses
- Telephone numbers
- Any other information relating to individuals

Data protection risks

This policy helps to protect Appleby Parish Council from some very real data security risks, including:

- **Breaches of confidentiality.** For instance, information being given out inappropriately.

Signed by the Chairman: _____



1
V 15.3.2022

Responsibilities

However, these people have key areas of responsibility:

- The Council is ultimately responsible for ensuring it meets its legal obligations.
- The Clerk, being the assigned Data Protection Officer who is responsible for data protection, is responsible for:
 - Keeping the Council updated about data protection responsibilities, risks and issues.
 - Reviewing procedures and policies and responding to enquiries.
- The only people able to access data covered by this policy should be those who **need it for their work**.
- Volunteers should keep all data secure, by taking sensible precautions and following the guidelines below.
- In particular, **strong passwords must be used** and they should never be shared.
- Personal data **should not be disclosed** to unauthorised people
- Data should be **regularly reviewed and updated** if it is found to be out of date. If no longer required, it should be deleted and disposed of.

Storage

When data is **stored on paper**, it should be kept in a secure place where unauthorised people cannot see it.

- When not required, the paper or files should be kept in a **locked drawer or filing cabinet**.
- **Archive documents should be securely archived** or shredded disposed of securely when no longer required.
- Electronic and paper Data will be held in **as few places as necessary**.
- Data should be **updated as inaccuracies are discovered**. For instance, if someone can no longer be reached on their stored telephone number, it should be removed from the database.

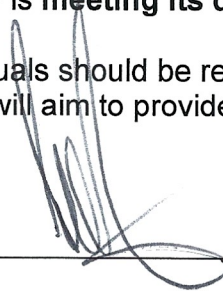
Subject Access

All individuals who are the subject of personal data held by Appleby Parish Council are entitled to:

- Ask **what information** Appleby Parish Council holds about them and why.
- Ask **how to gain access** to it.
- Be informed **how to keep it up to date**.
- Be informed how the company is **meeting its data protection obligations**.

Subject access requests from individuals should be referred to the Clerk who is responsible for data protection, who will aim to provide a response within 14 days.

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2
V 15.3.2022

Current legal requirements, state that as few people as possible should be involved in processing the Subject Access Request, therefore, in accordance with ERNLLCA guidance, the Clerk will deal with all requests , only involving the Councillors in rare circumstances, and only after seeking guidance from ERNLLCA.

The Clerk responsible for data protection will satisfy themselves that the person making the request is in indeed the subject of the request before handing over any information.

In certain circumstances, the Data Protection Act allows personal data to be disclosed to law enforcement agencies without the consent of the data subject. Appleby Parish Council will in these cases comply with police requests.

Signed by the Chairman: _____

