WARBOROUGH PARISH COUNCIL — DATA PROTECTION (GDPR) POLICY

This policy sets out how the Council complies with the UK GDPR and the Data Protection Act 2018. It is read alongside the Council's Privacy Notice, IT and Data Security Policy, and the retention schedule at Appendix A.

1. The Council's status

1.1 Warborough Parish Council is a **data controller** and is (or will be) **registered with the Information Commissioner's Office (ICO)**, paying the annual data protection fee.

1.2 **A Data Protection Officer is not required.** Parish councils have a specific statutory exemption from the duty to appoint a DPO. The Council instead designates the **Clerk/RFO as the person responsible for data protection**.

2. The data protection principles

2.1 The Council handles personal data so that it is: processed lawfully, fairly and transparently; collected for specified purposes only; adequate, relevant and limited to what is necessary; accurate and kept up to date; kept no longer than necessary (see Appendix A); and kept secure.

3. What the Council processes, and why

3.1 The Council processes limited personal data to carry out its functions — for example: names and contact details of councillors, staff, allotment holders, hall and facility hirers, contractors and suppliers, and members of the public who correspond with the Council.

3.2 The Council's **lawful bases** are usually:

- **Public task** — for the Council's statutory and public functions;
- **Legal obligation** — for example payroll, tax and audit;
- **Contract** — for employees, hirers and suppliers;
- **Consent** — for optional communications (e.g. a mailing list), which a person may withdraw at

any time.

3.3 The Council rarely processes **special category data**; where it does (for example limited health information for an event), it does so only with an appropriate condition and extra care.

4. Individuals' rights

4.1 Individuals have the right to be informed (via the **Privacy Notice**), and rights of access, rectification, erasure, restriction, objection and portability, as the UK GDPR provides.

4.2 A **subject access request** (or other rights request) is passed to the Clerk and answered **within one month**, normally free of charge.

5. Keeping data secure

5.1 Security is delivered through the arrangements in the **IT and Data Security Policy** — devices managed by DuoCall, data held in Microsoft 365 / SharePoint and Scribe with access control and back-up, multi-factor authentication, and secure handling and disposal of paper records.

6. Sharing data

6.1 The Council shares personal data only where necessary and lawful — for example with HMRC, the Council's payroll or professional advisers, its auditors, or where required by law. Data is not sold or shared for marketing.

6.2 Where a supplier processes personal data on the Council's behalf (for example Scribe, or the website provider), the arrangement is covered by the supplier's terms / a processing agreement.

7. Personal data breaches

7.1 Any suspected breach is reported at once to the Clerk. The Council will assess it and, where it is likely to result in a risk to individuals, **report it to the ICO within 72 hours**, and inform affected individuals where the risk is high. Breaches and the response are recorded.

8. Retention and disposal

8.1 Personal data is retained only as long as necessary, in line with the **retention schedule at Appendix A**, and then securely deleted or destroyed.

9. Review

9.1 This policy is reviewed by the Council at least every two years, and whenever the law or the Council's processing changes materially.

Adopted by Warborough Parish Council on: 2nd September 2026 (date) **Minute reference: 2026/129**

This Data Protection Policy will be reviewed in two years, unless circumstances dictate otherwise.

Appendix A — Retention schedule

Indicative minimum retention periods. "Current + N years" means the current year plus N complete years. Where a document is a public record it is retained permanently and offered to the county archives.

Record	Retention
Minutes of meetings (signed)	Permanent — deposit with county archives
Agendas and meeting papers	Retain permanently / deposit with archives
Byelaws, Standing Orders, policies (superseded)	Retain while current + keep superseded versions 6 years
Receipts and payments accounts, cash book	Current + 6 years (audited accounts retained permanently)
Invoices, bank statements, paying-in books, cheque records	Current + 6 years
VAT records	Current + 6 years
Payroll and wages records	Current + 6 years
Pension records	Retain as required (long-term)
Employee personnel records	6 years after employment ends
Insurance policies	While current + 6 years
Employers' liability insurance certificates	40 years
Risk assessments	Retain current + superseded versions 3 years
Allotment / hire agreements and related	Duration of agreement + 6 years

correspondence	
General correspondence	2–3 years unless of lasting value
Personal data collected for an event or one-off purpose	Delete once the purpose is met