



Data Protection Policy

Bow Brickhill Parish Council

Adopted: March 2026

Review Date: March 2027

1. Introduction

Bow Brickhill Parish Council ("the Parish Council") is committed to ensuring the privacy and security of personal data, in line with all relevant data protection laws. This includes the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, and any successor or related legislation. This policy supersedes earlier versions that were based on the Data Protection Act 1998.

All councillors, employees, contractors, and volunteers who handle personal data on behalf of the Council must adhere to this policy. Non-compliance may lead to disciplinary proceedings and, in serious cases, legal action.

2. Definitions

Personal Data: Information related to an identified or identifiable living individual.

Special Category Data: Personal data that reveals racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data, health data, or information concerning a person's sex life or sexual orientation.

Processing: Any operation performed on personal data, including collection, recording, storage, use, disclosure, alteration, or deletion.

Data Subject: The individual to whom the personal data relates.

Data Controller: The Clerk of Bow Brickhill Parish Council.

3. Data Protection Principles

The Parish Council undertakes to process all personal data in accordance with the principles set out in the UK GDPR. Personal data must be:

1. Processed lawfully, fairly, and in a transparent manner.
2. Collected for specific, explicit, and legitimate purposes and not further processed in a manner that is incompatible with those purposes.
3. Adequate, relevant, and limited to what is necessary in relation to the purposes for which it is processed.
4. Accurate and, where necessary, kept up to date.
5. Retained only for as long as is necessary for the purposes for which the personal data is processed.
6. Processed in a manner that ensures appropriate security, including protection against unauthorised or unlawful processing and against accidental loss, destruction, or damage.
7. The Parish Council is accountable and must be able to demonstrate compliance with these principles.

4. Lawful Bases for Processing

Personal data will only be processed by the Parish Council when at least one lawful basis applies, as required by the UK GDPR. The lawful bases include:

- Consent
- Legal obligation

- Performance of a contract
- Vital interests
- Public task
- Legitimate interests (where applicable)

5. Special Category Data

The Parish Council will only process special category data where a lawful basis under Article 6 of the UK GDPR and a specific condition under Article 9 applies. This will typically require explicit consent from the individual or a clear legal obligation.

6. Data Subject Rights

Individuals have the following rights regarding their personal data:

- The right to be informed about how their data is used
- The right to access their personal data
- The right to request rectification of inaccurate data
- The right to request erasure of their data, where applicable
- The right to restrict processing
- The right to object to processing
- The right to data portability, where relevant

All requests must be made in writing and will normally be answered within one month.

7. Data Security

The Parish Council will ensure that suitable technical and organisational measures are in place to safeguard personal data. These measures include:

- Password-protected systems
- Secure storage of paper records
- Controlled access to personal data
- Regular review of security practices

Any personal data breaches must be reported immediately to the Clerk, who will determine if notification to the Information Commissioner's Office (ICO) and/or affected individuals is required.

8. Retention and Disposal

Personal data will only be kept for as long as is necessary to fulfil its intended purpose and in accordance with the Parish Council's Retention Schedule. When data is no longer needed, it will be securely destroyed.

9. Councillors and Remote Working

Councillors processing personal data for Parish Council business must only do so using approved systems and in line with this policy. Personal devices used for Parish Council business must be appropriately secured.

10. Subject Access Requests

Individuals are entitled to request access to their personal data free of charge. Such requests will be verified and responded to within the statutory time limits.

11. Review and Responsibility

The Clerk holds responsibility for overseeing compliance with data protection requirements. This policy will be reviewed annually, or earlier if there are changes to legislation or official guidance.

POLICY APPROVAL

Adopted by: Bow Brickhill Parish Council

Meeting date:

Minute reference:

Next review date:

Signed: _____

Chair of Council

Signed: _____

Clerk to the Council

Version Control

Version	Date	Description	Author
1.0	17/03/2025	Policy adopted by Full Council	J Godden, Clerk