LILBOURNE PARISH COUNCIL
Data Protection Policy

1. Introduction
Lilbourne Parish Council ("the Council") is committed to protecting personal data and respecting the rights of individuals. This policy sets out how the Council complies with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, and guidance issued by the Information Commissioner's Office (ICO).
This policy applies to councillors, employees, volunteers, and contractors who handle personal data on behalf of the Council.

The Council is the **Data Controller**.

2. Purpose of the Policy
This policy ensures that the Council:
- handles personal data lawfully, fairly, and transparently
- collects only the data it needs
- keeps data secure and up to date
- retains data only for as long as necessary
- respects the rights of individuals
- demonstrates accountability and good governance

3. What is Personal Data?
Personal data is any information relating to an identifiable individual, including:
- names, addresses, phone numbers, email addresses
- correspondence and enquiries
- planning comments
- allotment tenancy information
- financial details for payments or contracts
- employment-related information

The Council does **not** process burial records or CCTV images.

4. Lawful Bases for Processing
The Council processes personal data under one or more of the following lawful bases:
- **Public task** – performing a function in the public interest
- **Legal obligation** – complying with statutory requirements
- **Contract** – managing agreements and payments
- **Consent** – where freely given and specific
- **Legitimate interests** – where appropriate and proportionate

Where consent is used, individuals may withdraw it at any time.

5. Data Protection Principles
The Council complies with the six data protection principles. Personal data must be:
1. **Processed lawfully, fairly, and transparently**
2. **Collected for specified, explicit, and legitimate purposes**
3. **Adequate, relevant, and limited to what is necessary**
4. **Accurate and kept up to date**
5. **Kept only for as long as necessary**
6. **Processed securely**

6. Data Security
The Council takes appropriate technical and organisational measures to protect personal data, including:
- secure storage of digital and paper records
- password-protected devices
- restricted access to information
- secure disposal of confidential waste
- regular review of data handling practices

Councillors using personal devices for council business must ensure appropriate security measures are in place.

7. Sharing Personal Data
The Council may share personal data with:
- West Northamptonshire Council or other public bodies
- contractors or service providers working on behalf of the Council
- auditors or regulators
- councillors, where necessary to respond to enquiries

Data is shared only when necessary and never sold.

8. Data Retention
The Council retains personal data only for as long as necessary and in line with:
- statutory requirements
- recognised good practice
- the Council's retention schedule

When no longer required, data is securely deleted or destroyed.

9. Rights of Individuals
Individuals have the right to:
- access their personal data
- request correction of inaccurate information
- request deletion (in certain circumstances)
- object to or restrict processing
- request data portability
- withdraw consent (where applicable)

Requests must be handled in accordance with the Council's **Subject Access Request Procedure**.

10. Data Breaches
A data breach is any incident that results in:
- loss of personal data
- unauthorised access
- accidental disclosure
- destruction or alteration

All breaches must be reported immediately to the Clerk. Serious breaches will be reported to the ICO within 72 hours where required.

11. Accountability and Governance
Lilbourne Parish Council:
- follows ICO guidance

- operates in line with the NALC Model Publication Scheme
- reviews its data protection practices annually
- ensures councillors and staff understand their responsibilities

These measures support compliance with **Assertion 10** of the Annual Governance Statement.

- Northants CALC act as Lilbourne Data Protection Officer (supported by the Clerk)

12. Contact Details

Lilbourne Parish Council Clerk: Mrs C E Valentine Email: clerk@lilbourne-pc-gov.uk
Website: www.lilbourne-pc.gov.uk

This policy is reviewed and readopted annually. Dated May 2026