

Meopham Parish Council

St Johns Centre, Wrotham Road, Meopham, Kent, DA13 0AA - Tel: 01474 813779

Email: enquiries@meopham-pc.gov.uk

Website: www.meopham-pc.gov.uk



Data Protection Policy

1. Purpose of this Policy

Meopham Parish Council is committed to protecting personal data and respecting the privacy rights of residents, councillors, employees, contractors, volunteers, Allotment plot holders and all individuals whose information we process.

This policy sets out how the Council will comply with the requirements of the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 and other relevant legislation. It provides a framework for the lawful, fair and secure handling of personal data and supports good governance, accountability and public trust.

The Council recognises that data protection is an ongoing responsibility and not a one-off exercise. This policy forms part of the Council's wider governance arrangements and will be reviewed regularly to ensure continued compliance and effectiveness.

2. Scope

This policy applies to:

- All Parish Councillors.
- The Parish Clerk and any other employees.
- Contractors, consultants and volunteers acting on behalf of the Council.
- Any person handling personal data on behalf of the Council.

It applies to all personal data processed by the Council, whether held electronically, on paper, in photographs, audio recordings, video recordings or any other format.

3. Data Protection Principles

The Council will comply with the seven principles of data protection and ensure personal data is:

3.1 Lawful, Fair and Transparent - Personal data will only be processed where there is a lawful basis for doing so and individuals will be informed how their data is used through the Council's Privacy Notice.

3.2 Collected for Specified Purposes - Personal data will only be collected for legitimate and clearly identified purposes and will not be used for incompatible purposes.

3.3 Adequate, Relevant and Limited - The Council will only collect and process the personal data necessary for the purpose for which it is required.

3.4 Accurate and Up to Date - Reasonable steps will be taken to ensure personal data is accurate and corrected where necessary.

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3.5 Kept for No Longer Than Necessary - Personal data will be retained in accordance with the Council's retention schedule and securely disposed of when no longer required.

3.6 Secure - Appropriate technical and organisational measures will be used to protect personal data against unauthorised access, loss, destruction, alteration or disclosure.

3.7 Accountable - The Council will maintain appropriate records, policies and procedures to demonstrate compliance with data protection legislation.

4. Roles and Responsibilities

The Council

The Council is the Data Controller and is responsible for determining the purposes and means of processing personal data.

The Parish Clerk

The Parish Clerk is the Council's designated officer for data protection matters and is responsible for:

- Maintaining the Council's data protection framework.
- Keeping records of processing activities.
- Managing rights requests.
- Managing data breaches.
- Maintaining data protection policies and procedures.
- Ensuring appropriate training and awareness.

Councillors, Employees and Volunteers

All individuals handling Council information must:

- Follow this policy and associated procedures.
- Keep personal data secure.
- Report suspected breaches immediately.
- Complete any required training.
- Only access information necessary for their role.

5. Data Mapping and Records of Processing

The Council will maintain a Data Map (Record of Processing Activities) identifying:

- The purposes for which personal data is processed.
- Categories of personal data held.
- Lawful bases for processing.
- Any special category data processed.
- Data sharing arrangements.
- Data processors used by the Council.
- International transfers. (Not applicable)

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- Retention periods.

The Data Map will be reviewed regularly and updated whenever new processing activities are introduced.

6. Lawful Bases for Processing

The Council will identify and document a lawful basis for all processing activities.

The lawful bases relied upon may include:

- Consent.
- Contract.
- Legal Obligation.
- Vital Interests.
- Public Task.
- Legitimate Interests.

The Council will ensure that the lawful basis selected is appropriate for the processing activity and will be documented within the Data Map.

7. Special Category Data

Where the Council processes special category data, it will:

- Identify a lawful basis under Article 6 UK GDPR.
- Identify an additional condition under Article 9 UK GDPR.
- Maintain an Appropriate Policy Document where required by law.
- Apply enhanced security measures and access controls.

Special category data may include information relating to health, disability, religious beliefs, trade union membership or other protected characteristics.

8. Individual Rights

The Council recognises the rights of individuals under UK GDPR.

Individuals have the right to:

- Be informed about how their data is used.
- Access their personal data.
- Request correction of inaccurate information.
- Request erasure where applicable.
- Restrict processing in certain circumstances.
- Data portability where applicable.
- Object to processing.
- Request human review of automated decisions. (Meopham Parish Council does not use automated decision)

Requests may be made verbally or in writing and will be handled in accordance with the Council's Freedom of Information Policy.

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The Council will normally respond within one calendar month.

9. Privacy Notices

The Council will maintain and publish a Privacy Notice explaining:

- What personal data is collected.
- Why it is collected.
- The lawful basis for processing.
- How long information is retained.
- Who information may be shared with.
- Individual rights.
- How complaints may be made.

The Privacy Notice will be reviewed regularly and updated whenever processing activities change.

10. Information Security

The Council will take appropriate measures to protect personal data.

These measures include:

Physical Security

- Secure storage of paper records.
- Locked cabinets where appropriate.
- Controlled access to Council premises and records.

Electronic Security

- Password-protected systems and devices.
- Multi-factor authentication where available.
- Regular software updates.
- Secure backup arrangements.
- Restricted user access based on role.

Email and Electronic Communications

- Council business should be conducted using authorised Council email accounts wherever possible.
- Personal data must only be shared where necessary and secure methods should be used.
- Group emails containing personal email addresses should use blind carbon copy (Bcc) where appropriate.

Personal Devices

Where personal devices are permitted for Council business, users must follow the Council's IT Policy requirements to ensure information remains protected.

11. Data Sharing

The Council may share personal data with:

- Government departments.
- Regulatory bodies.

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- Professional advisers.
- Banks and financial institutions.
- Other public authorities.
- Service providers acting on the Council's behalf.

Personal data will only be shared where there is a lawful basis for doing so.

12. Data Processors

Where the Council uses third-party organisations to process personal data on its behalf, it will ensure:

- Appropriate due diligence is undertaken.
- A written contract meeting Article 28 UK GDPR requirements is in place.
- The processor provides adequate security assurances.
- Processing arrangements are reviewed periodically.

13. International Transfers

Meopham Parish Council does not have any international transfers.

14. Data Protection Impact Assessments (DPIAs)

The Council will adopt a privacy-by-design approach and assess privacy risks whenever:

- New systems are introduced.
- New services are launched.
- Significant changes are made to existing processing.
- High-risk processing activities are proposed.

Where appropriate, a Data Protection Impact Assessment (DPIA) will be completed and retained.

15. Data Breaches

All actual or suspected personal data breaches must be reported immediately to the Parish Clerk.

The Council will:

- Investigate all breaches promptly.
- Assess risks to individuals.
- Take appropriate remedial action.
- Maintain a log of breaches within the Incident Register.
- Report breaches to the Information Commissioner's Office where required.
- Notify affected individuals where there is a high risk to their rights and freedoms.

The Council aims to assess reportable breaches within the statutory 72-hour reporting period.

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16. Training and Awareness

The Council will ensure that councillors, employees and relevant volunteers receive appropriate data protection awareness training.

Training will include:

- Basic data protection principles.
- Information security responsibilities.
- Handling rights requests.
- Data breach reporting.
- Good records management practices.

Refresher training will be provided periodically.

17. Monitoring and Review

The Council will review its data protection arrangements regularly and at least annually.

The review will consider:

- The accuracy of the Data Map.
- Compliance with retention schedules.
- Data breach records (within the Incident register).
- Rights requests.
- Contracts with data processors.
- Privacy notices.
- Training requirements.
- Changes in legislation or guidance.

Evidence of reviews will be recorded as part of the Council's governance arrangements.

18. Complaints

Anyone who is concerned about how the Council has handled their personal data should contact the Parish Clerk in the first instance.

If a complainant remains dissatisfied, they may complain to the:

Information Commissioner's Office (ICO)

Wycliffe House

Water Lane

Wilmslow

Cheshire SK9 5AF

Telephone: 0303 123 1113

Website: <https://ico.org.uk>

19. Policy Review

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This policy will be reviewed annually, or sooner if required due to legislative changes, ICO guidance, Council activities, or identified risks.

Adopted at Full Council 30 June 2026 Minutes F.C.52.