

# Acton Burnell, Frodesley, Pitchford, Ruckley & Langley Parish Council

## Personal Data Management and Audit Policy

### 1. Data Management

1.1 The Parish Council, as Data Controller, will ensure that the Principles of Data Protection legislation are applied in the management of personal data that it holds. It will also ensure that employees and members understand the requirements of the new legislation.

1.2 The Clerk and Councillors (as Data Processors) will follow the underlying principles that personal data:

*Must be processed lawfully, fairly and transparently.*

*Is only used for a specific processing purpose that the data subject has been made aware of and no other, without further consent.*

*Should be adequate, relevant and limited i.e. only the minimum amount of data should be kept for specific processing.*

*Must be accurate and where necessary kept up to date.*

*Should not be stored for longer than is necessary and is held and secure.*

*Should be processed in a manner that ensures appropriate security and protection.*

1.3 In respect of personal data held by the Parish Council (either centrally or by individual Councillors) of or about any living person, the subject of that data has the right to:

*Access their personal data*

*Correct and update their personal data*

*Have their personal data erased*

*Object to processing of their personal data or to restrict it to certain purposes only*

*Data portability*

*Withdraw consent at any time for any processing of data for which consent was previously given*

*Lodge a complaint with the Information Commissioner's Office*

1.4 The Council (as Data Controller) has adopted a Subject Access Request Policy. This is available to view on the Council website or via the Clerk.

1.5 The Clerk (as Data Compliance Officer) will:

1.5.1 Ensure that data is held securely, password controlled, accessed only on a need to know basis and that back-up systems are in place

1.5.2 Ensure that data is held no longer than is necessary and follow guidelines for its deletion

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1.5.3 Ensure that Consent Forms are obtained where necessary, recorded and reviewed as necessary

1.5.4 Undertake data protection impact assessments where required for new projects as directed by the Council (as Data Controller).

1.5.5 Ensure the notification of personal data breaches in accordance with the Council's Security Incident Response Policy

1.5.6 Will report to Council, the progress on compliance with GDPR including any requested monitoring data.

## 2. Data Audit

2.1 The Clerk (as Data Compliance Officer) will:

2.1.1 Carry out a data audit to establish what data the Council processes

2.1.2 Document and maintain a log of the data processing carried out by the Council

2.1.3 Undertake an analysis of the risks presented by data processing and ensure that appropriate security measures are in place

2.1.4 Review annually all relevant data processes and data security measures, updating where necessary.

## 3. Policy Adoption and Review

Date Adopted:	September 2018	Minute Ref: 18.9.11i
Date Reviewed:	September 2025	Minute Ref: 25.9.15.3
Date of Next Review:	September 2026	