

LUDDINGTON AND HALDENBY PARISH COUNCIL

Data Protection Policy and Procedures 2025

Name of Organisation	LUDDINGTON AND HALDENBY PARISH COUNCIL
Address inc phone number	clerk@luddingtonandhaldenbypc.org 01724 798770
Registered Charity No.	Not applicable
Date Policy Agreed	12th May 2025
Date of Next Review	May 2027
Signature	Rob Adams, Chair Minute Ref: 2505/09
Assigned Member responsible for Data Protection	Claire Fox, Clerk of the Parish Council

Introduction

LUDDINGTON AND HALDENBY PARISH COUNCIL needs to gather and use certain information about individuals. These can include our users, volunteers, and other people the organisation has a relationship with or may need to contact.

This policy describes how this personal data must be collected, handled, and stored to meet the organisation's data protection standards and to comply with the law.

Data protection law

The Data Protection Act is underpinned by eight important principles. These say that personal data must:

1. Be processed fairly and lawfully.
2. Be obtained only for specific, lawful purposes.
3. Be adequate, relevant, and not excessive.
4. Be accurate and kept up to date.
5. Not be held for any longer than necessary.
6. Processed in accordance with the rights of data subjects.
7. Be protected in appropriate ways.

Policy scope

This policy applies to:

- All users and volunteers, contractors, suppliers, and other people working on behalf of LUDDINGTON AND HALDENBY PARISH COUNCIL

It applies to all data that LUDDINGTON AND HALDENBY PARISH COUNCIL holds relating to identifiable individuals, even if that information technically falls outside of the Data Protection Act 1998. This can include:

- Names of individuals
- Postal addresses
- Email addresses
- Telephone numbers
- Any other information relating to individuals.

Data protection risks

This policy helps to protect LUDDINGTON AND HALDENBY PARISH COUNCIL from some very real data security risks, including:

- **Breaches of confidentiality.** For instance, information being given out inappropriately.

Responsibilities

However, these people have key areas of responsibility:

- The Trustees are ultimately responsible for ensuring that LUDDINGTON AND HALDENBY PARISH COUNCIL meets its legal obligations.
- The **Assigned Person responsible for Data Protection**, is responsible for:
 - Keeping the trustees updated about data protection responsibilities, risks, and issues.
 - Reviewing procedures and policies and respond to enquiries.
- The only people able to access data covered by this policy should be those who **need it for their work**.
- Volunteers should keep all data secure, by taking sensible precautions and following the guidelines below.
- In particular, **strong passwords must be used**, and they should never be shared.
- Personal data **should not be disclosed** to unauthorised people.
- Data should be **regularly reviewed and updated** if it is found to be out of date. If no longer required, it should be deleted and disposed of.

Storage

When data is **stored on paper**, it should be kept in a secure place where unauthorised people cannot see it.

- When not required, the paper or files should be kept **in a locked drawer or filing cabinet**.
- **Archive documents should be shredded** and disposed of securely when no longer required.
- Electronic and paper Data will be held in **as few places as necessary**.
- Data should be **updated as inaccuracies are discovered**. For instance, if someone can no longer be reached on their stored telephone number, it should be removed from the database.

Subject Access

All individuals who are the subject of personal data held by LUDDINGTON AND HALDENBY PARISH COUNCIL are entitled to:

- Ask **what information** LUDDINGTON AND HALDENBY PARISH COUNCIL holds about them and why.
- Ask **how to gain access** to it.
- Be informed **how to keep it up to date**.
- Be informed how the company is **meeting its Data Protection obligations**.

Subject access requests from individuals should be referred to **the Assigned Person responsible for Data Protection**, who will aim to provide a response within 14 days.

The Assigned Person responsible for Data Protection will satisfy themselves that the person making the request is in indeed the subject of the request before handing over any information.

In certain circumstances, the Data Protection Act allows personal data to be disclosed to law enforcement agencies without the consent of the data subject. LUDDINGTON AND HALDENBY PARISH COUNCIL will in these cases comply with police requests.

The Assigned Person Responsible for Data Protection for LUDDINGTON AND HALDENBY PARISH COUNCIL is: The Clerk of the Council clerk@luddingtonandhaldenbypc.org