



# Moulsoe Parish Council Data Protection Policy

Moulsoe Parish Council recognises its responsibility to comply with the General Data Protection Regulations (GDPR) 2018, which regulates the use of personal data. This does not have to be sensitive data; it can be as little as a name and address.

## 1. Introduction

Moulsoe Parish Council processes a wide range of information to carry out its statutory functions, deliver services, support councillors and staff, and communicate with residents. The Council handles:

- Publicly available information relating to its services and operations
- Confidential or developing policy information
- Commercially sensitive information
- Personal data relating to employees, councillors, volunteers and contractors
- Personal data from residents contacting the Council for information, services, or complaints

The Council is committed to managing all information responsibly, securely and lawfully, in compliance with:

- The UK General Data Protection Regulation (UK GDPR)
- The Data Protection Act 2018

The Council regularly reviews this policy, considering statutory guidance and updates from the Information Commissioner.

The Council's Publication Scheme, based on the statutory model scheme for parish councils, outlines the information routinely available to the public.

## 2. Protecting Confidential and Sensitive Information

The Council recognises its responsibility to process confidential, sensitive and personal information in accordance with data protection law. All personal data must be:

- processed lawfully, fairly and transparently  
This means that personal information should only be collected from individuals if staff have been open and honest about why they want the personal information.
- collected for specified, legitimate purposes  
This means that data is collected for specific, explicit and legitimate purposes only.
- relevant and limited to what is necessary  
Data will be monitored so that too much or too little is not kept; only data that is needed should be held.
- accurate and kept up to date and retained no longer than necessary  
Personal data should be accurate, if it is not it should be corrected. Data no longer needed will be shredded or securely disposed of.
- processed securely  
There should be protection against unauthorised or unlawful processing and against accidental loss, destruction or damage.

### **3. Definitions**

- Data Subject: A living individual whose personal data is processed.
- Personal Data: Information identifying a person (e.g., name, address, email, IP address, bank details).
- Special Category Data: Sensitive personal data requiring higher protection.
- Data Controller: Moulsoe Parish Council.
- Data Processor: A third party processing data on behalf of the Council.
- Processing: Any operation performed on data, including storing, using, sharing, altering or deleting it.

### **4. Purposes for Processing Personal Data**

The Council processes data to:

- fulfil employment obligations
- carry out official functions and statutory duties
- maintain councillor, volunteer and contractor records
- respond to resident enquiries and service requests
- conduct surveys, consultations and statutory reporting
- undertake research, audits and quality monitoring
- support community safety and liaise with enforcement authorities
- manage administrative and financial processes
- meet transparency obligations under government legislation

Processing may be carried out jointly with partner organisations where necessary and lawful.

### **5. Lawful Bases for Processing**

The Council ensures that its processing meets at least one of the following lawful bases:

- Consent
- Contract
- Legal obligation
- Vital interests
- Public task
- Legitimate interests

Special category data is processed only where an Article 9 condition applies, such as explicit consent or substantial public interest.

## **6. Data Protection Responsibilities**

Ultimate responsibility lies with the Council. Day-to-day duties are delegated to the **Parish Clerk**:

**Email:** parish.clerk@moulsoeparishcouncil.gov.uk

**Tel:** 07458 136826

**Address:** Moulsoe Parish Council, Moulsoe Millennium Hall, Cranfield Road, Moulsoe MK16 0HB

## **7. Diversity Monitoring**

The Council monitors diversity data for employees, councillors and applicants to ensure equality in its activities. Diversity data:

- is confidential
- is accessed only by authorised personnel
- is never used in selection decisions
- may be anonymised for reporting

## **8. Information Provided to the Council**

Personal information provided by individuals is used only for the purpose for which it was given, unless required by law or further consent is obtained. Individuals are responsible for keeping their data accurate.

## **9. Information Security**

The Council keeps personal data secure using:

- password-protected devices
- up-to-date digital security
- locked storage for paper documents
- restricted access to sensitive data
- secure email and communication practices
- backup processes

The Council has a Retention of Documents and Records Policy which outlines when to dispose of different categories of data. The schedule will be reviewed as when needed to ensure that it continues to meet Council and statutory requirements. Data is retained only for as long as necessary; it is then securely destroyed.

## **11. Data Subject Rights**

Individuals have the right to:

- access their data
- request correction

- request deletion (where permitted)
- object to processing
- restrict processing
- request portability (if applicable)
- withdraw consent

They may complain to the Parish Clerk or the **Information Commissioner** (Tel: 0303 123 1113, Email: casework@ico.org.uk).

The Council does **not** use automated decision-making or profiling.

## **12. Personal Data Breaches**

All personal data breaches must be reported immediately to the Parish Manager. If a breach poses a risk to individuals, the ICO will be notified within 72 hours. Affected individuals will be informed where appropriate.

## **13. Subject Access Requests (SARs)**

- Verify the identity of the requester
- Respond within one month
- Provide the data securely and clearly

## **14. Publication & Transparency**

The Council complies with the Local Government Transparency Code 2014.

The Council publishes:

- expenditure over £100
- annual accounts and governance statements
- internal audit reports
- councillor responsibilities
- land and building assets
- agendas (three clear days before meetings)
- minutes within one month

Meetings are public unless confidential matters require exclusion of press/public.

## **15. Data Transparency**

The Council supports the publication of factual “public data” to promote accountability and resident engagement. The Council publishes information promptly and in accessible formats.

## **16. Compliance with the Data (Use and Access) Act 2025 (DUAA)**

Moulsoe Parish Council complies with relevant obligations under the Data (Use and Access) Act 2025, which updates and modernises several parts of UK data protection law.

Key requirements affecting the Council include:

- **Recognised Legitimate Interests**  
DUAA introduces a new legal basis—recognised legitimate interests—allowing data processing for specific public interest tasks such as safeguarding, emergency response, crime prevention, and statutory duties without requiring a full legitimate interests assessment.
- **Data Subject Access Requests (DSARs)**  
Controllers must now conduct reasonable and proportionate searches when responding to DSARs, reflecting codified regulatory guidance.
- **Right to Complain Directly to the Controller**  
Individuals can now raise concerns directly with the Council before contacting the Information Commission.

### **17. Training and Awareness**

All councillors, staff, and volunteers will receive training appropriate to their role and responsibilities. Training will be refreshed regularly and upon role change.

### **18. Policy Review**

This policy will be reviewed annually or earlier if legislation, guidance or Council procedures change.