



Hullbridge Parish Council Data Protection Policy

Adopted 08/09/2025 – Reviewed Annually

1. Purpose

Hullbridge Parish Council is committed to protecting the rights and privacy of individuals in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 (DPA 2018). This policy sets out our approach to data protection and outlines the rights and obligations of individuals whose personal data we process, including staff, councillors, volunteers, contractors, and residents.

This policy supports and aligns with the Council's Information Asset Register and Record of Processing Activities (ROPA), and General Privacy Notice which record and monitor all data processing activities undertaken by the Council.

2. Definitions

- Personal Data: Any information relating to an identified or identifiable natural person.
- Special Category Data: Includes data on racial or ethnic origin, political opinions, religious beliefs, health, sexual orientation, and trade union membership.
- Processing: Any operation performed on personal data, including collection, storage, use, disclosure, or destruction.
- Data Controller: Hullbridge Parish Council, who determines the purposes and means of processing.
- Data Processor: Any party processing data on behalf of the Council.
- Data Subject: An individual whose personal data is processed.
- Data Protection Officer: While not required by law for parish councils, the Council has designated a Data Protection Lead (Clerk to the Council) responsible for compliance.

3. Data Protection Principles

The Council is committed to the principles of data protection as defined in Article 5 of UK GDPR. Personal data must be:

1. Processed lawfully, fairly and transparently.



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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. Retained only as long as necessary.
6. Processed securely.

4. Lawful Basis for Processing

Personal data will be processed by the Council under one or more of the following legal bases:

- Consent of the data subject.
- Contractual necessity.
- Legal obligation.
- Vital interests.
- Public task (most common for council activities).
- Legitimate interests (only in very limited contexts).

Special category data will only be processed where a lawful condition under Article 9 of UK GDPR is met, such as employment rights, legal claims, or public interest.

All processing activities are recorded in the Council's ROPA, including the legal basis, data categories, retention periods, and security measures.

5. Data Subjects' Rights

Individuals have the following rights under UK GDPR:

- Right to be informed (via Privacy Notices).
- Right of access (Subject Access Request).
- Right to rectification.
- Right to erasure (in limited circumstances).
- Right to restrict processing.
- Right to data portability (where applicable).
- Right to object.
- Rights related to automated decision-making (not used by the Council).

Requests must be made to the Clerk and will be responded to within one month, subject to verification of identity.

6. Data Security

Hullbridge Parish Council maintains appropriate technical and organisational measures to ensure the security and confidentiality of all personal data. This includes:



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- Access control (physical and digital).
- Use of encrypted devices and secure passwords.
- Training for councillors, staff and volunteers.
- Regular review of processing activities and associated risks.

Details of asset-level security controls are documented in the Information Asset Register.

Cyber Security and Penetration Testing

Hullbridge Parish Council recognises the importance of robust cyber security measures in protecting personal data. To support this, the Council will ensure that appropriate technical and organisational controls are in place to safeguard information systems.

Where proportionate and appropriate, the Council may arrange for independent cyber security assessments, including penetration testing, to identify vulnerabilities and strengthen defences against unauthorised access, data loss, or misuse.

Findings from such assessments will be reviewed by the Clerk (as the Council's Data Protection lead) and, where necessary, action will be taken to address any identified risks in line with the Council's information security procedures.

7. Data Breaches

All data breaches will be investigated. If a breach is likely to result in a risk to individuals' rights and freedoms, the Information Commissioner's Office (ICO) will be notified within 72 hours.

Where required, affected data subjects will also be informed without undue delay.

All breaches and near-misses are logged and reviewed.

8. Data Sharing & Processors

Where the Council shares data with third parties (e.g. payroll providers, contractors), this will be done under a written agreement ensuring compliance with UK GDPR.

Third parties acting as data processors must provide sufficient guarantees to implement appropriate safeguards.



9. Data Protection Impact Assessments (DPIAs)

A DPIA will be conducted for any high-risk processing activity, such as the use of CCTV or large-scale data collection. DPIAs will assess risks and identify mitigation measures.

Closed-Circuit Television (CCTV)

Hullbridge Parish Council operates CCTV for the purposes of crime prevention, public safety, and protection of Council assets. CCTV is not used for monitoring staff performance or behaviour. Any use of CCTV is undertaken in line with the Council's CCTV Policy and in compliance with UK GDPR and the Data Protection Act 2018.

10. Data Retention & Disposal

The Council follows a documented Retention Schedule, which defines how long data is held. This schedule is integrated into the ROPA and Information Asset Register.

Data is securely destroyed when no longer required.

11. Roles and Responsibilities

- Clerk to the Council: Acts as the Data Protection Lead.
- All staff and councillors: Must comply with this policy and attend training as required.
- Volunteers and contractors: Must be briefed on data protection responsibilities.

12. Training

All councillors, staff, and volunteers are trained on data protection principles and responsibilities on induction and annually thereafter.

Specialist training is provided to those handling sensitive data or responding to subject access requests.

13. Review and Monitoring

This policy will be reviewed annually or in response to changes in legislation, guidance from the ICO, or significant changes to Council operations.

14. How to Make a Data Access Request

Individuals have the right to access the personal data that Hullbridge Parish Council holds about them. This is known as a Subject Access Request (SAR).



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To make a Subject Access Request, you should submit a written request to the Clerk to the Council. Your request should include:

- Your full name and contact details.
- A clear description of the information you are requesting.
- Any details that will help the Council locate the information (e.g., relevant dates, interactions, or services).
- Proof of your identity (such as a copy of a passport or driving licence and a utility bill showing your current address).

Requests can be submitted by email or post. The Council will acknowledge receipt and respond within 20 working days of receiving all necessary information. If the request is complex or involves numerous records, this deadline may be extended, and you will be notified within the original time frame. There is no charge for making a request. However, the Council may charge a reasonable fee if the request is manifestly unfounded or excessive, or if additional copies of the information are requested.

If you are unhappy with the Council's handling of your request, you have the right to lodge a complaint with the Information Commissioner's Office (ICO) at www.ico.org.uk.