



Thurcroft Parish Council

DATA PROTECTION & GDPR

Data Protection & GDPR

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Thurcroft Parish Council

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Purpose

The Council is committed to being transparent about how it collects and uses the personal data of its staff, councillors, residents, and hall hirers, and to meeting our data protection obligations. This policy sets out the Council's commitment to data protection and your rights and obligations in line with the **UK General Data Protection Regulation (UK GDPR)** and the **Data Protection Act 2018 (DPA)**.

This policy applies to the personal data of:

- Staff & Personnel:** Job applicants, employees, contractors, and former employees.
- Public & Service Users:** Residents, allotment tenants, village hall hirers, and individuals who correspond with the Council.

The Council has appointed the **Clerk** as the person with responsibility for data protection compliance.

Definitions

- "Personal Data":** Any information relating to an identifiable living person (e.g., name, email, home address, bank details for hire deposits).
- "Processing":** Any use of data, including collecting, recording, storing, disclosing, or destroying it.
- "Special Category Data":** Sensitive information such as health data (e.g., for staff sickness or hall accessibility requirements) or criminal records.

Data Protection Principles

The Council processes all personal data in accordance with the following principles:

- Processed lawfully, fairly, and transparently.
- Collected only for specified, explicit, and legitimate purposes (e.g., managing a tenancy or employment).
- Limited to what is necessary for those purposes.
- Kept accurate and up to date.
- Retained only for as long as necessary.
- Secured against unauthorised processing, loss, or damage.



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Processing

Personal Data

The Council processes personal data under the following legal bases:

- **Contractual Necessity:** To perform a contract, such as an **employment contract** or a **Village Hall Hire Agreement**.
- **Legal Obligation:** To comply with the law (e.g., tax reporting, HMRC records, or Audit requirements).
- **Public Task:** To perform tasks carried out in the public interest or in the exercise of official authority vested in the Council (e.g., managing allotments or planning consultations).
- **Legitimate Interests:** To protect the Council's interests (e.g., using CCTV for hall security), provided this doesn't override the individual's rights.
- **Consent:** Where no other basis applies, the Council will seek explicit consent (e.g., for a community newsletter).

Special Categories of Data

The Council will only process sensitive data (e.g., staff health records or Hirer accident reports) where:

- Necessary for employment law obligations.
- Necessary for reasons of **substantial public interest** (e.g., safeguarding).
- Necessary for the establishment or defence of **legal claims** (e.g., insurance disputes following a hall booking incident).

Individual Rights

As a data subject (whether a staff member or a hall hirer), you have the right to:

1. **Subject Access Request (SAR):** Access and receive a copy of your data.
2. **Rectification:** Require the Council to correct inaccurate data.
3. **Erasure:** Request the deletion of data where it is no longer necessary.
4. **Object:** Object to processing based on legitimate interests or public tasks.



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Data Security

The Council takes the security of all data seriously.

- **HR & Hiring Files:** Personnel files and booking forms are held in secure electronic folders or locked cabinets.
- **Access Control:** Access to sensitive data (like bank details for deposit returns) is restricted to the **Clerk/RFO**.
- **Third Parties:** We may share data with payroll providers or insurance companies. They are contractually required to keep data confidential and secure.
- **Retention:** Data is kept according to our Document Retention Schedule (e.g., 6 years for financial records).

Parish Council Data Retention Schedule

Category	Record Type	Retention Period	Reason / Authority
Hall Hire	Booking Forms / Agreements	6 years after event	Statute of Limitations (Contract claims)
Hall Hire	Security Deposit / Refund Logs	6 years + current	HMRC Tax / Audit Requirements
Hall Hire	Accident Book / Incident Reports	3 years (Adults) / Until age 21 (Minors)	Personal Injury claim window
Finance	Invoices, VAT, and Bank Statements	6 years + current	Audit & HMRC Compliance
HR	Personnel Files (Staff)	6 years after leaving	Employment Law / Pensions
HR	Payroll and P60s	6 years	HMRC Statutory requirement
HR	Unsuccessful Job Applications	6 to 12 months	To defend against Discrimination claims



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Public	Minutes of Meetings (Signed)	Permanent	Local Government Act 1972 (Historical record)
Public	General Correspondence (Residents)	2 years	General administrative utility
Security	CCTV Footage	30 - 31 days	ICO Surveillance Guidance

Operational Rules for Disposal

- Hard Copies:** All paper records containing personal data (booking forms, staff contracts) must be **cross-cut shredded** or placed in a secure confidential waste bin.
- Digital Files:** Files must be permanently deleted from the hard drive and the "Recycle Bin." If stored in a cloud (e.g., OneDrive or Google Drive), ensure the **version history** is also cleared if the data is sensitive.
- Review Cycle:** The Clerk should perform an **annual "Data Purge"** (typically at the end of the Financial Year) to remove records that have reached their expiry date.

Training

The Council will provide training to all staff and councillors who handle personal data to ensure they understand their responsibilities under this policy.