



## Old Woughton Parish Council Data Protection and Privacy Policy

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**Reviewed and adopted November 2025**

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### Introduction

Old Woughton Parish Council (henceforth referred to as "the Council") is committed to protecting personal data and privacy.

This policy outlines how personal data is collected, used, stored, and shared in accordance with:

- The UK General Data Protection Regulation (UK GDPR)
- The Data Protection Act 2018
- The Human Rights Act 1998

### What is Personal Data?

"Personal data" refers to any information that can directly or indirectly identify a living person. This includes:

- Names, addresses, phone numbers, email addresses
- Identification numbers
- Photographs or video images
- IP addresses
- Any other data that can be used to identify an individual, either alone or when combined with other information

Some data is classed as "Special Category Data" and is subject to additional protection. This includes data relating to:

- Health
- Racial or ethnic origin
- Political opinions
- Religious beliefs
- Sexual orientation
- Trade union membership
- Genetic or biometric data (where used for ID purposes)

### Who is the Council?

The Council is the data controller, which means it determines the purposes and means of processing personal data.

The Council may also work with other data controllers, including:

- Milton Keynes City Council
- The Parks Trust
- Other Parish or Town Councils
- Community groups (e.g. The Patch Allotments Association)
- Consultation bodies, regulatory agencies, and inspectors
- Contractors and service providers

In some cases, the Council may act as a joint data controller where data is processed collectively for a shared purpose. In other cases, each organisation is separately responsible for its data processing.

## What Personal Data the Council Processes

The Council may collect and process some or all of the following personal data:

- Name, title, and aliases
- Contact details (postal address, email address, telephone number)
- Photographs or video images (e.g., for newsletters, social media, or the Council's website)
- Tenancy records (e.g., for The Patch Allotments)
- Public comments or responses during consultations

Where relevant, the Council may also process special category data, including:

- Health information (e.g., accessibility or mobility requirements)
- Safeguarding records
- Consent documentation

## How the Council Uses Personal Data

The Council will only process personal data where it is lawful and necessary. This may include:

- Providing and managing public services (including verifying identity)
- Administering allotment tenancies and community-based events
- Maintaining financial and accounting records
- Publishing Council-related updates or communications
- Responding to enquiries, consultations, or complaints
- Carrying out safeguarding duties in line with statutory obligations
- Preventing or detecting fraud or criminal activity
- Complying with legal and regulatory requirements
- Maintaining public safety and security, including the use of CCTV in public spaces

## Lawful Bases for Processing

The Council relies on the following lawful bases for processing under the UK GDPR:

- **Public task** – where the processing is necessary for the Council to perform official functions in the public interest
- **Legal obligation** – to comply with legal or regulatory duties
- **Contract** – when processing is necessary for a contract, or to take steps prior to entering into one

- **Consent** – where an individual has provided informed and explicit consent
- **Vital interests** – to protect life in urgent situations
- **Legitimate interests** – where the Council has a legitimate interest and such processing does not override individual rights

For “special category data”, the Council may rely on:

- Explicit consent
- Legal or regulatory obligations
- Substantial public interest
- Employment and social protection law
- Safeguarding individuals at risk

## **Consent**

Where consent is the lawful basis for processing, the Council will:

- Request clear, specific, and informed consent
- Explain the purposes for which the data is being collected
- Provide a simple method to withdraw consent at any time

Consent may be withdrawn at any time by contacting the Council (see Section 14).

## **Sharing Personal Data**

Personal data may be shared with third parties where necessary to fulfil the Council’s duties and functions. These may include:

- Other local authorities, public bodies, or statutory agencies
- Contractors or service providers (e.g., for IT systems, newsletters, or database support)
- Law enforcement bodies, regulators, or courts (where legally required)
- Partners in community-based initiatives or shared services

All third parties are required to implement appropriate data protection safeguards and will only be granted access to personal data necessary for their role.

## **International Transfers**

The Council does not routinely transfer personal data outside of the United Kingdom. If international transfers are necessary (e.g., cloud-based services or website access), the Council will ensure that adequate safeguards are in place, including:

- Compliance with UK adequacy regulations
- Use of standard contractual clauses approved by the Information Commissioner’s Office (ICO)

## **Data Retention**

The Council retains personal data only for as long as necessary to fulfil its statutory obligations or operational needs. Examples include:

- **Financial records** – retained for at least 8 years (in line with HMRC requirements)
- **Allotment records** – retained for the duration of tenancy and up to 6 years afterwards
- **Complaints or correspondence** – typically retained for up to 6 years
- **Safeguarding records** – retained in line with legal and sector-specific guidance

Retention periods are regularly reviewed, and data is securely destroyed when no longer required or as dictated by the document retention and disposal policy.

## **Data Subject Rights**

Individuals have the following rights under data protection law:

1. **Right of access** – to request a copy of personal data held by the Council
2. **Right to rectification** – to request correction of inaccurate or incomplete data
3. **Right to erasure** – to request deletion of personal data (subject to legal obligations)
4. **Right to restrict processing** – to limit the use of personal data under certain conditions
5. **Right to object** – to object to data processing in specific circumstances
6. **Right to data portability** – to request transfer of data to another controller (where applicable)
7. **Right to withdraw consent** – at any time, where consent is the legal basis for processing
8. **Right to lodge a complaint** – with the Information Commissioner's Office (see Section 15)

Before fulfilling any rights request, the Council may require proof of identity to protect the privacy and security of personal data.

See the Council's Subject Access Request Policy:

 <http://oldwoughton.org.uk/parish-council/policies>

## **Data Security**

The Council takes data security seriously and implements a range of protective measures, including:

- Encryption and secure data storage
- Physical security for paper records
- Access controls and audit trails
- Staff training on data protection responsibilities
- Routine reviews of procedures and systems

## **Changes to This Policy**

This policy is reviewed every four years or earlier where required by changes in legislation or Council practices.

The most current version is available on the Council's website and from the Parish Clerk.

## **Contact Details**

For enquiries about this policy, to exercise rights, or to raise a concern, contact the Council:

Old Woughton Parish Council  
PO Box 6548,  
Milton Keynes,  
MK10 1AB

01908 465811  
[clerk@oldwoughton.org.uk](mailto:clerk@oldwoughton.org.uk)  
[www.oldwoughton.org.uk](http://www.oldwoughton.org.uk)

### **Contacting the Information Commissioner's Office (ICO)**

If you are dissatisfied with how the Council has handled your personal data, you may contact the ICO:

Information Commissioner's Office  
Wycliffe House, Water Lane  
Wilmslow, Cheshire  
SK9 5AF

0303 123 1113  
<https://ico.org.uk>

### **Review History**

August 2012	New policy adopted
March 2015	No changes
July 2020	No changes
November 2025	Data protection and privacy policy merged into one policy