

BILBROUGH PARISH COUNCIL

INFORMATION GOVERNANCE & DATA PROTECTION

COMPLIANCE PACK

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1. Information Governance Statement

Bilbrough Parish Council is committed to:

- Transparency in decision-making
- Lawful and fair processing of personal data
- Protecting confidential information
- Complying with the Freedom of Information Act 2000
- Complying with the Data Protection Act 2018 and UK GDPR

The Council is registered as a Data Controller with the Information Commissioner's Office.

2. Freedom of Information Policy

2.1 Scope

This policy applies to all recorded information held by the Council.

2.2 Publication Scheme

The Council adopts the ICO Model Publication Scheme and publishes information in accordance with its approved scheme.

2.3 Making a Request

Requests must:

- Be in writing (email acceptable)
- State the applicant's name
- Provide a contact address
- Describe the information requested

2.4 Timescales

The Council will endeavour to respond within **20 working days**.

2.5 Exemptions

Information may be withheld where exemptions apply under the Act, including:

- Personal data
- Commercially sensitive information
- Confidential information

2.6 Complaints

Applicants may request an internal review. If dissatisfied, they may complain to the Information Commissioner's Office.

3. Publication Scheme (Summary)

The Council publishes information under the following classes:

- Who we are and what we do
 - What we spend and how we spend it
 - What our priorities are
 - How we make decisions
 - Policies and procedures
 - Lists and registers
 - Services we provide
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4. Data Protection Policy

4.1 Principles

The Council complies with UK GDPR principles:

1. Lawfulness, fairness and transparency
2. Purpose limitation
3. Data minimisation
4. Accuracy
5. Storage limitation
6. Integrity and confidentiality
7. Accountability

4.2 Lawful Bases for Processing

The Council processes personal data under:

- Public task
- Legal obligation
- Contract
- Consent (where appropriate)

4.3 Types of Personal Data Held

Examples include:

- Employee data (Clerk)
- Councillor contact details
- Correspondence
- Complaint records

4.4 Data Security

The Council ensures:

- Password-protected electronic files
- Secure email use
- Locked storage for paper files
- Restricted access to authorised persons only

4.5 Data Sharing

Personal data is shared only where:

- Required by law
- Necessary for audit
- Required for service delivery
- Appropriate safeguards are in place

5. Privacy Notice (General)

Who We Are

Bilbrough Parish Council is the Data Controller for personal data collected and processed.

What Information We Collect

We may collect:

- Names
- Addresses
- Email addresses
- Telephone numbers
- Financial information (where required)

Why We Collect It

To:

- Deliver council services
- Manage allotments or facilities
- Respond to enquiries
- Process payments
- Meet legal obligations

Your Rights

Individuals have the right to:

- Access their data
- Rectify inaccurate data
- Erase data (where applicable)
- Restrict processing
- Object to processing
- Lodge a complaint with the ICO

Contact: clerk@bilbrough-pc.gov.uk

6. Subject Access Request (SAR) Procedure

6.1 Making a Request

Requests may be made verbally or in writing.

6.2 Identification

Proof of identity may be required.

6.3 Timescale

The Council will respond within **one calendar month**.

6.4 Fees

No fee is normally charged unless the request is manifestly unfounded or excessive.

7. Data Breach Procedure

7.1 What is a Data Breach?

A breach includes:

- Loss of personal data
- Unauthorised access
- Accidental disclosure
- Hacking

7.2 Immediate Action

The Clerk must:

1. Contain the breach
2. Assess the risk
3. Record the incident
4. Notify affected individuals where required.

7.3 ICO Notification

Serious breaches must be reported to the Information Commissioner's Office within **72 hours**.

8. Records Retention Policy (Basic Schedule)

Record Type	Retention Period
Minutes	Permanent
Financial records	6 years
Complaints	6 years

9. Councillor Data Protection Guidance

Councillors must:

- Use council email accounts where possible
- Not use personal devices without security measures
- Not share confidential documents
- Delete personal data when no longer required
- Return all council data when leaving office

Personal data held by councillors for council business is subject to FOI and Data Protection legislation.

10. Adoption Resolution

Resolved that Bilbrough Parish Council adopts the *Information Governance & Data Protection Compliance Pack* comprising the Freedom of Information Policy, Publication Scheme, Data Protection Policy, Privacy Notice, Subject Access Request Procedure, Data Breach Procedure and Records Retention Policy, and that it be reviewed annually.