

Gressenhall Parish Council

Data management policy

1 Introduction

1. This policy covers all information held by Gressenhall Parish Council (PC) as a corporate body, including data held by the Parish Clerk and the councillors for the purposes of that body. It sets out how Gressenhall PC will manage the information it holds to meet the requirements of the [Data Use and Access Act \(2025\)](#), the [Data Protection Act \(2018\)](#) and the [General Data Protection Regulation \(GDPR\)](#), while also complying with the [Transparency Code for Smaller Authorities](#), the [Freedom of Information Act \(2000\)](#), and the [Environmental Information Regulations \(2004\)](#). The policy also implements the data management requirements in the [Gressenhall PC Standing Orders](#).
2. For the purposes of the legislation and this policy, data include items held in hard copy and processed manually as well as those held and processed in information technology systems.
3. The Data Protection Act is concerned with personal data: that is, information that can be associated with a particular living individual. The association may be direct (for example, if it includes an e-mail address), or indirect (where the identity of the individual can be deduced from the information given).
4. The Transparency Code for Smaller Authorities requires Gressenhall PC to publish its financial accounts, and to make invoices and other supporting documentation available for inspection by the public.
5. The Freedom of Information Act allows anyone to request information held by Gressenhall PC on a specific topic.
6. The Gressenhall PC Privacy Notice sets out what we process, our lawful basis for this, the rights that are granted by the Data Protection Act and Freedom of Information Act, and how to exercise them.
7. The Data Protection Act, GDPR and Freedom of Information Act are enforced by the [Information Commissioner's Office](#) (ICO). Their complaints procedure is described in the Gressenhall PC Privacy Notice.

2 Our obligations

8. The Data Protection Act requires the information held by Gressenhall PC to be used:
 - Fairly. Gressenhall PC must not use personal data in unexpected or misleading ways. We must also consider whether the benefits of our use of personal data outweigh any detrimental effects.
 - Transparently. Gressenhall PC must inform people of their legal rights under the Data Protection Act.

- Lawfully. The lawful basis for each use of personal data is set out in the Gressenhall PC Privacy Notice. Gressenhall PC must also comply with all other obligations of statute and common law. For example, we must not place copyright material on the [Gressenhall PC website](#) without the copyright holder's permission. These other legal obligations are not enforced by the Information Commissioner's Office.
 - For specified, explicit purposes. These are set out in the Gressenhall PC Privacy Notice.
 - In a way that is adequate, relevant and limited to only what is necessary. Gressenhall PC must ensure that we have enough information at each stage to support our processing, but no more.
9. The information held by Gressenhall PC must be accurate and, where necessary, kept up to date.
10. Gressenhall PC must delete personal data when it is no longer necessary, taking into account any requirements for the retention of records such as financial documents. Our Document Retention Policy sets out the retention time for the various kinds of records we hold. (These do not all contain personal data.) In some cases, the retention period is set by legislation.
11. Gressenhall PC must keep personal data secure to protect against unlawful or unauthorised processing or access, loss, destruction and damage.

3 Data management procedures

12. The procedures below are intended to meet the requirements of:
- a. Necessity, by redacting personal information at the earliest stage that allows adequate processing.
 - b. Traceability (to support correction, portability and deletion) by holding only a single identifiable copy of any information that may be subject to a Data Protection Act or Freedom of Information request, where this is reasonably practicable.

3.1 Implementing the right to be informed

13. Gressenhall PC shall implement the right to be informed through a [Privacy Notice](#) prepared in accordance with [ICO guidance](#). This shall be placed on our website. A link to the Privacy Notice shall be included on the web pages containing contact information, and in the signature block of all e-mails from the Gressenhall PC domain (Gressenhallparishcouncil.norfolkparishes.gov.uk).
14. The Parish Clerk shall provide potential suppliers of services with a reference to the Privacy Notice at the point where personal data is first collected. Existing suppliers should be reminded of the Privacy Notice when re-appointed.
15. Where consent is required for the use of information, the person seeking the consent shall provide a reference to the Privacy Notice as set out in the rest of Section 3.

3.2 Consent for use of councillor information

16. The Transparency Code requires Gressenhall PC to publish the names of councillors, their roles on the PC and on any subcommittees, and their Declarations of Pecuniary Interest. The publication of any other information (such as contact details or pictures) is optional.
17. The Parish Clerk shall provide each councillor with the Privacy Notice along with the Declaration of Acceptance of Office. They shall ask whether they consent to personal information other than their names being added to the website, and the Parish Clerk shall record the response. Further consent shall be obtained if a new category of information is proposed for publication.
18. When a person ceases to act as a councillor, the Parish Clerk shall remove their details from the Gressenhall PC website and inform Breckland District Council. The Parish Clerk and the other councillors should remove their official e-mail address from any address lists they use. Documents related to the councillor shall be managed in accordance with the Document Retention Policy.

3.3 Consent for information on the Parish Clerk

19. Parishioners must be able to contact the Parish Clerk. Gressenhall PC shall provide and publish a role-based e-mail address for this purpose, to ensure data security and avoid the unnecessary publication of personal data.
20. Any personal addresses or telephone numbers are published by consent, which shall be recorded when given and may be withdrawn. If this consent is withheld, Gressenhall PC shall consider the provision of a dedicated telephone number or non-geographic postal address as a point of contact.
21. The amounts of monthly salary payments may only be included in the agenda, discussions or minutes of PC meetings by consent.
22. Consent must be voluntary, and so must not be raised at interview or considered in a performance or salary review. A record of consent shall be kept with the Parish Clerk's other employment details.
23. When a Parish Clerk leaves their post, any contact details other than their official e-mail address shall be removed from the Gressenhall PC website. Documents related to their employment shall be securely archived away from the official laptop and removed from all backups before these are passed to the new Parish Clerk.

3.4 Contracts and contract negotiations

24. The Parish Clerk shall be responsible for managing the data associated with contracts and contract negotiations. This shall include a periodic review of records to remove any that are no longer required by the Document Retention Policy.
25. Contractual and financial information shall be circulated to councillors only when necessary to obtain Parish Council approval for budgets, transfers or expenditure. Any copies (including annotated versions) held by councillors shall be deleted once a decision has been made and minuted, and the minutes agreed.

3.5 Official communications

26. Gressenhall PC receives official communications from organisations such as Breckland and Norwich Councils and the police, and from our councillors in their official capacity. These include newsletters, reports, and invitations to meetings. They do not in general include personal information but do need management to support our retention policy, and potentially fall within the scope of the Freedom of Information Act.
27. Councillors shall forward any communications of this kind that they receive to the Parish Clerk (unless the Clerk is also an addressee), and delete their own copies.
28. The Parish Clerk shall determine the scope for the distribution of the communication, based on its content and any decisions of the Parish Council.
29. The Parish Clerk shall add meeting invitations to the appropriate calendar, and notify councillors of the date. For events open to the public, the Parish Clerk may add a news post giving details of the meeting to the Gressenhall PC website, with an expiry date the day after the meeting.
30. Where the content of the communication is available via a Universal Resource Locator (URL), the Parish Clerk shall forward the link to the councillors with a brief explanation. If it should be available to parishioners, the Parish Clerk may add a post containing the link to the Gressenhall PC website, with an expiry date determined by our retention policy, and set its category to Newsletter.
31. In other cases, the Parish Clerk shall prepare a version of the content suitable for uploading to the Gressenhall PC website, upload it to the Media folder associated with this content, and link it to a post with the appropriate level of visibility and an expiry date determined by our retention policy. The post shall be given the Newsletter category.
32. Where these items are raised at Parish Council meetings as correspondence received or otherwise, councillors should not divulge personal data and it shall not be minuted. In particular, people should be identified by their official role rather than by name.
33. The Parish Clerk shall regularly delete uploaded media that are not linked to active posts.
34. Councillors should only make local copies of these communications where necessary. These copies shall not be retained longer than the period defined by the Data Retention Policy, and should be deleted earlier if the need for the copy has ended.

3.6 Planning applications

35. On receiving notification of a planning application, the Parish Clerk shall transfer the component documents from the Planning Portal to the Gressenhall PC website media library, identified by the planning application reference. They shall then include these documents in a post with category Planning and an expiry date set to the final date for consideration of responses, and notify councillors of its existence.

36. The Parish Clerk shall, where possible, notify the applicant that Gressenhall PC has received notification of their application, and the date of the meeting where it will be discussed. They shall also provide a reference to the Privacy Notice.
37. Councillors should avoid downloading their own copies of planning documents. If they do so, they shall delete them as soon as the Parish Council has made its response to the planning authority.

3.7 Communications from members of the public

38. The published point of contact for Gressenhall Parish Council shall be the Parish Clerk. However, the Parish Clerk may provide a councillor's e-mail on request where a parishioner wishes to make direct contact. Letters to councillors should be sent under separate cover via the Parish Clerk.
39. This section covers letters from members of the public addressed to the Parish Clerk or to a council member as Councillor, and e-mails delivered to an official (Gressenhall-pc.norfolkparishes.gov.uk) address, other than Data Protection Act and Freedom of Information Act requests to the Parish Clerk as data controller.
40. It also covers any letter or e-mail that a recipient expects to refer to in a meeting of the Parish Council or to process under the provisions of Section 5, paragraph (d) of the Privacy Notice. Any such e-mails shall be forwarded to the recipient's official e-mail address (only) and the original shall be deleted permanently.
41. Councillors receiving communications covered by ¶39 or ¶40 shall notify the Parish Clerk that they have received a communication from the sender and its date without providing further details, unless both the councillor and the Parish Clerk are direct addressees or carbon copy (CC) recipients.

3.7.1 Determining ownership

42. The initial owner of an e-mail covered by this policy shall be:
 - a. the first recipient named in the body of the communication (if any), and otherwise
 - b. the first recipient at an official address, taking direct addresses before CC addresses and ignoring blind carbon copy (BCC) recipients, and otherwise
 - c. the first recipient (defined as above) who is a councillor, and otherwise
 - d. the person nominated by the Parish Clerk from the recipients who notify the Parish Clerk that an e-mail has been received.
43. The initial owner of a letter covered by this policy shall be nominated by the Parish Clerk from the recipients who notify the Parish Clerk that a letter has been received.
44. If the Parish Clerk assigns the owner, they shall also notify other reporting recipients that they are not the owner.
45. Recipients who are not the owner of a communication shall delete or dispose of it in accordance with the Data Security Policy.

46. The owner may ask the Parish Clerk who else has received the communication, and pass ownership to any other recipient with their consent. If the communication is forwarded by e-mail, the original shall be permanently deleted.

3.7.2 Responsibilities of the owner

47. The owner shall acknowledge receipt of the communication to the sender and provide a reference to the Gressenhall PC Privacy Notice. This may be combined with the provision of advice or obtaining of further consent as described below.
48. The owner shall assess whether the communication contains any information that should be shared on the basis described in Section 5, paragraph (d) of the Gressenhall PC Privacy Notice. If so, the minimum amount of personal information required to achieve the aim of the sharing should be passed on as soon as possible. The originator should be informed, provided this does not conflict with the goals of the notification. The Parish Clerk shall be informed of the authorities notified and the dates.
49. If the communication has, or appears to have, come from a child, the owner shall take care in seeking any necessary consent that the child understands what they are consenting to, and the possible consequences of that consent.
50. The owner shall assess whether the communication contains any [special category information](#) about the sender. If so, the owner may where appropriate suggest that the communication be rephrased to remove this. Otherwise, they shall seek consent to hold that information.
51. The owner shall assess whether the communication contains any personal information about third parties that requires their consent to process in accordance with the Gressenhall PC Privacy Notice. If so, the owner shall notify the sender that consent must be obtained from the third party, and may where appropriate suggest that the communication be rephrased to remove it. If this is done, the original communication shall be deleted or disposed of in accordance with the Data Security Policy.
52. Where the owner must obtain consent from a third party, they shall do so without divulging any personal information about others. If consent cannot be obtained (including cases where the third party cannot be contacted or does not reply) then the communication shall be deleted or disposed of in accordance with the Data Security Policy. The original sender shall be informed that no further action can be taken.
53. The owner may:
 - a. Provide advice and support as an individual councillor. This may include suggesting or making an approach to other people or organisations better able to address the issue than the Parish Council. Any response shall make clear that this is the recommendation of the councillor, not of the Parish Council as a body.
 - b. Raise the issue at the Parish Council for a formal decision, without disclosing personal data. Any actions then taken would be actions of the Parish Council.

- c. Suggest that the issue could be raised at the Parish Council, but that this would necessarily require some specified personal data to be disclosed at the meeting and in the minutes, and seek consent from all the affected parties.
- 54. Where issues are to be raised at the Parish Council, the owner shall prepare a briefing note containing any necessary personal data for which consent has been given, and provide it to the Parish Clerk along with records of any consents required. The Parish Clerk shall then make the briefing note available to the councillors, and the owner shall delete their own copy of the note and consents.
- 55. The owner may seek advice on handling a communication from other councillors, the Parish Clerk, or other organisations provided no personal information is disclosed without a legal basis.
- 56. Where a communication leads to discussion at the Parish Council, the owner shall inform the originator of the date of the meeting where it appears on the agenda.
- 57. The owner shall delete or dispose of the correspondence in accordance with the Data Security Policy when it is no longer required. Unless otherwise determined by the Document Retention Policy, this should be:
 - a. For ¶53.a, once the advice or support has been given.
 - b. For ¶¶53.b and 53.c, once the minutes of the relevant PC meeting have been agreed.
- 58. Briefing notes for agenda items shall be deleted once the minutes of the relevant Parish Council meeting have been agreed, unless the PC has resolved to include them as an annexe to the minutes. In that case, the Parish Clerk shall review the briefing note and consents, and redact any personal information that is not necessary to support the PC decision or not covered by consent.