



Hurstpierpoint & Sayers Common Parish Council
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Data Protection Policy

For Council 21 May 2026

The Parish Council recognises its responsibility to comply with the Data Protection Act 2018 and the General Data Protection Regulation (UK GDPR). The act and regulation regulate the use of personal data, this does not have to be sensitive data, it can be as little as a name and address.

THE DATA PROTECTION ACT:

The Data Protection Act 2018 replaces the 1998 Act and sets out high standards for the handling of personal information and protecting individuals' rights for privacy. It also regulates how information can be collected, handled and used. The Data Protection Act applies to anyone holding information about people electronically or on paper.

THE GENERAL DATA PROTECTION REGULATION:

The General Data Protection Regulation 2018 says that the information provided to people about how we process their personal data must be concise, transparent, intelligible and easily accessible, written in clear and plain language, particularly if addressed to a child, and free of charge.

The Parish Council has a number of procedures in place to ensure that it complies with The Data Protection Act 2018 and the General Data Protection Regulation 2018 when holding personal information. The Parish Council has appointed the Clerk as the designated Data Protection Officer. The clerk will receive training for this role, as required.

When dealing with personal data, The Parish Council staff and Councillors must ensure that:

- **IT IS PROCESSED FAIRLY AND LAWFULLY:** This means that information should only be collected from individuals if staff and Councillors have been open and honest about why they want the information.
- **IT IS PROCESSED FOR SPECIFIED PURPOSES ONLY**
- **IT IS RELEVANT TO WHAT IT IS NEEDED FOR:** Data will be monitored so that too much or too little is not kept; only data that is needed should be held.
- **IT IS ACCURATE AND KEPT UP TO DATE:** Personal data should be accurate, if it is not it should be corrected.
- **IT IS NOT KEPT LONGER THAN IT IS NEEDED**
- **IT IS PROCESSED IN ACCORDANCE WITH THE RIGHTS OF INDIVIDUALS:** This means that individuals must be informed, upon request, of all the information held about them.
- **IT IS KEPT SECURELY:** This means that only staff and Councillors can access the data, it should be stored securely so it cannot be accessed by members of the public.

COLLECTING DATA:

The Parish Council recognises its responsibility to be open with people when taking personal details from them. This means that staff must be honest about why they want a particular piece of information. If, for example, a member of the public gives their phone number to staff or a member of the Parish Council, this

will only be used for the purpose it has been given and will not be disclosed to anyone else. Data may be collected via the Parish Council's website – the 'Contact Us' form or 'Emailing Lists' form. The webpages for both forms contain policy statements about how the data will be stored and used.

STORING AND ACCESSING DATA:

The Parish Council may hold information about individuals such as their addresses and telephone numbers. These are kept in a secure location at the Parish Office and are not available for the public to access. All data stored on a computer is password protected. Once data is not needed anymore, if it is out of date or has served its use, it will be shredded or deleted from the computer. The Parish Council is aware that people have the right to access any information that is held about them. If a person requests to see any data that is being held about them,

- They must be sent all of the information that is being held about them
- There must be explanation for why it has been stored
- There must be a list of who has seen it
- It must be sent within one month.

Requests that are manifestly unfounded or excessive may be refused or a charge made. If a request is refused, a reason must be given. If an individual requests that their data is rectified or erased, this will be carried out.

DATA AUDIT

The Parish Council maintains an audit of the types of data collated and this is set out in Annex A. This data audit sets out how Hurstpierpoint & Sayers Common Parish Council processes personal data in the course of its duties and functions. It is designed to ensure compliance with the UK GDPR and Data Protection Act 2018, promote transparency, and support accountability.

DISCLOSURE OF INFORMATION:

If an elected member of the Council, for example a Councillor needs to access information to help carry out their duties, this is acceptable. They are only able to access as much information as necessary and it should only be used for that specific purpose. If for instance someone has made a complaint about over hanging bushes in a garden, a Councillor may access an address and telephone number of the person who has made the complaint so they can help with the enquiry. They can only do this providing they represent the area that the subject lives in. However, before they access any sensitive information about a person, they would need consent to do this from the Parish Clerk. Data should never be used for political reasons unless the data subjects have consented.

CONFIDENTIALITY & BREACH:

Parish Council staff must be aware that when complaints or queries are made, they must remain confidential unless the subject gives permission otherwise. When handling personal data, this must also remain confidential. If a data breach is identified the Information Commissioners Office must be informed and an investigation will be conducted.

TRAINING:

Parish Councillors and staff will be trained in data protection practices and training will be refreshed annually.

REVIEW:

This policy will be reviewed annually, as well as an annual review of the compliance and effectiveness of the policy.

Annex A

Data Protection Policy

Data Audit 2026/27



Hurstpierpoint & Sayers Common Parish Council – Data Audit Report

Date Completed: 12/05/2026
Clerk/Responsible Officer: Sarah Groom
Reviewed By: Assistant Clerk 2

1. Overview

This data audit sets out how Hurstpierpoint & Sayers Common Parish Council processes personal data in the course of its duties and functions. It is designed to ensure compliance with the UK GDPR and Data Protection Act 2018, promote transparency, and support accountability.

2. Data Inventory Table

This table identifies the categories of personal data collected and held by Hurstpierpoint & Sayers Common Parish Council, the purposes for which it is used, the lawful basis for processing, how and where it is stored, how long it is kept, and with whom it may be shared.

Data Category	Data Collected	Data Subject	Purpose	Lawful Basis	How Collected	Data Storage	Retention Period	Data Shared With (where necessary)
Council Minutes & Agendas	Names; roles; public comments	Councillors; public; external representatives	Governance; public record	Legal Obligation	Direct	Website; Secure cloud storage; Hard Copy	Indefinite (archival)	Public; Councillors; Staff
Hall Hire	Name; contact details; payment information	Hirees	Booking Administration; Financial Administration	Contract	Direct	Secure cloud storage; secure email	6 years (financial)	Staff; Councillors
Staff Records	Name; contact details; bank details; payroll data; HR information	Employees	Employment	Legal Obligation; Contract	Direct; DBS; HMRC; Previous Employer	Secure cloud storage; secure email storage; secure hard copy	6 years post-employment	Payroll provider; HMRC; Auditors; Bank; Councillors
Volunteer Records	Name; contact details	People who volunteer for the council	Coordinating volunteer activities	Legitimate interest	Direct	Secure cloud storage; secure email server	Duration of volunteering + 1 year	Staff; Councillors
Public Enquiries	Name; contact details	General public	Responding to queries	Legitimate interest	Direct	Secure cloud storage; secure email server	1 year	Staff; Councillors
Mailing Lists	Name; email address	Residents; Community Group representatives	Community engagement; Allotment Administration;	Consent	Direct	Secure cloud storage; secure email server	Until unsubscribed	No
CCTV	Video footage	Visitors to council property	Security;	Legitimate interest	CCTV system	DVR; Secure Cloud	Max 30 days unless incident	Police (if required)
Contractors/ Suppliers	Name; Company Name; Contact Details; bank Account Details; Invoice Numbers; Quotes/Tenders	Individuals and businesses providing goods or services to the Parish Council	Procurement and Tendering; Financial Administration	Legal Obligation; Contract	Direct	Mailbox; secure cloud storage; secure email server	6 years (financial)	Staff; Councillors; Banks; Auditors
Allotment Tenancy and Waiting List Records	Name; contact details; payment info	Existing Tenants; Prospective Tenants	Financial Administration; Allotment Maintenance; Allotment Administration	Contract; Legal Obligation; Legitimate interest	Direct	secure cloud storage; secure email server; Hard copy	6 years after tenancy ends	Hurstpierpoint Allotment Association; Councillors
Cemetery & Burial Records	Name; contact details; Plot number	Next of Kin; Burial Applicants; Exclusive Right of Burial owners;	Financial Administration; Public Records; Cemetery Management; Cemetery Administration	Contract; Legal Obligation; Public Task	Direct; Funeral Directors; Memorial Masons;	Secure cloud storage; secure email server; Hard Copy	Indefinite	Funeral Directors; Memorial masons; next of kin; Exclusive Right of Burial owners; Councillors; Banks

Hurstpierpoint & Sayers Common Parish Council recognises and facilitates individuals' rights under UK GDPR, including: right to access, right to rectification, right to erasure (where applicable), right to restrict processing, right to data portability (where applicable), right to object and right to lodge a complaint with the ICO

Data subject requests should be made in writing to the Clerk and will be responded to within one month.

3. Data Processors (External Parties)

This table sets out the external organisations that process personal data on behalf of the Parish Council, or with whom data is routinely shared, together with the purpose of sharing and the agreements in place.

Processor	Purpose	Data Shared	DPA in Place? (Data Processing Agreement)	Data Protection Policy for external processor	Comments
Payroll Provider - WSCC	Monthly payroll	Employee details	Yes and in place until terminated	https://www.westsussex.gov.uk/about-the-council/information-and-data/data-protection/	
HMRC	Statutory reporting	Employee pay/tax	N/A	https://www.gov.uk/government/publications/data-protection-act-dpa-information-hm-revenue-and-customs/about-dpa	The Council shares employee data with HMRC for payroll, tax and pension purposes. HMRC acts as a data controller under relevant UK tax legislation, Article 6(1)(c) – Legal obligation
Website Host - Google LLC	Council website	Names; Contact details; Photographs; Published documents; IP addresses; Technical data	Yes and in place until terminated	https://cloud.google.com/terms/data-processing/terms	(Check DPA)
Wasabi Design	Council Website Administration	Names; Contact details; Photographs; Published documents; IP addresses; Technical data	Yes and in place until terminated	https://www.wasabi.design.co.uk/privacy-policy/	Access to CMS for updating council website (Check DPA)
IT Provider (JB Computers)	IT support; Device Maintenance;	Name; Contact details; HR Information; Payroll Information; Supplier Information; Email data; Technical usage data	Yes and in place until terminated	Not found on website (https://www.jbcomputers.co.uk/)	(Check DPA/privacy policy/Data Protection Policy)
Email Provider (e.g. Outlook/Microsoft)	Communication	Name; Contact details; Supplier Information; HR Information; Financial records; Email content; Attachments	Yes and in place until terminated	https://learn.microsoft.com/legal/gdpr	
External Auditors - Moore West Sussex	Financial audit	Accounting Records	N/A	https://www.moore.co.uk/privacy-policy-2/	Data shared with the appointed external auditor as part of statutory audit requirements under the Local Audit and Accountability Act 2014. Moore acts as an independent data controller with their own privacy notice
Internal Auditor - Mulberry LAS	Internal audit	Accounting Records	N/A	https://mulberrylas.co.uk/wp-content/uploads/2024/03/Privacy-Notice.pdf	(Check DPA)
Unity Bank, Nationwide, Cambridge & Counties, United Trust, Hampshire Trust, CCLA, CAF for Charity	Council and Village Centre banking	Account names, numbers, councillors and staff identity documents and personal identification details	N/A		Banks act as data controllers, deciding how and why they process personal data (e.g., identity checks, account management). The Council provides necessary personal data (e.g., signatory details) for the bank's lawful purposes, not under the Council's instruction. Therefore, under UK GDPR, no Data Processing Agreement is required. The council will share only necessary data, keep a record of what is shared and why and use banks with appropriate data protection measures.
Hurstpierpoint Allotment Association	Allotment Administration; Allotment Management	Names; contact information; plot number	No		(Check DPA)

4. Security Measures

- Password-protected cloud storage and email accounts
- Daily backups
- Paper files stored in locked safe and/or locked and alarmed room
- Anti-virus and firewall protection
- Limited access to personal data internally
- Annual review of IT and data handling procedures

5. Next Steps & Recommendations

- ☐ Review consent procedures (mailing lists/data sharing)
- ☐ Annual data protection training for staff and councillors
- ☐ Ensure all third party processors have up-to-date agreements
- ☐ Discuss digital document retention with IT provider (auto deletion etc?)
- ☐ Maintain an incident log for data breaches (best practice)