



Appropriate Policy Document (APD) For Compliance with the UK GDPR and Data Protection Act 2018

1. Introduction

This Appropriate Policy Document explains how Buckhorn Weston & Kington Magna Parish Council ensures compliance with the UK GDPR and the Data Protection Act 2018 (DPA 2018) when processing special category data. It outlines the Parish Council's procedures for handling such data lawfully, fairly, and transparently, and describes the safeguards applied to protect individuals' rights.

This Policy and the **Data Retention Schedule** should be used as the basis for the management of personal data and more widely all data processed by Buckhorn Weston & Kington Magna Parish Council. Establishing effective Information Governance systems requires the purpose, legality and period of processing to be identified prior to undertaking the handling of any data. For clarification processing refers to the capture, storage, use, transfer and disposal of data.

2. Our Lawful Bases for Processing

The Parish Council processes special category data only where strictly necessary and where one of the following lawful bases applies:

2.1 UK GDPR Article 6 lawful bases

Examples include:

- Legitimate interests
- Performance of a contract
- Legal obligation
- Vital interests
- Public task

2.2 UK GDPR Article 9 conditions for special category data

Depending on the processing activity, we rely on one or more of the following:

- Explicit consent
- Employment, social security, and social protection
- Vital interests
- Not-for-profit bodies
- Data made public by the data subject
- Legal claims
- Substantial public interest (as defined in Schedule 1 DPA 2018)

3. Schedule 1 Conditions Relied Upon

Where applicable, the Parish Council rely on one or more of the following Schedule 1 conditions:

- Employment, social security, and social protection
- Preventing or detecting unlawful acts

- Protecting the public
- Regulatory requirements
- Safeguarding of children and individuals at risk
- Equality of opportunity or treatment
- Support for individuals with a disability
- Legal claims
- Archiving, research, or statistical purposes

4. Data Minimisation

The Parish Council only collect and process the minimum amount of special category necessary for the specific purpose. Access is restricted to staff who require it to perform their duties.

5. Retention and Deletion

The Parish Council retain such data only for as long as necessary for the purpose for which it was collected. Retention periods are defined in our **Data Retention Schedule**. When data is no longer required, it is securely deleted or anonymised.

6. Security Measures

The Parish Council applies appropriate technical and organisational measures, including:

- Access controls and role-based permissions
- Encryption of data at rest and in transit
- Secure storage systems
- Multi-factor authentication
- Staff training on data protection
- Regular audits and monitoring
- Incident response and breach reporting procedures

7. Accountability and Governance

The Parish Council maintain detailed records of processing activities (ROPA) in accordance with Article 30 UK GDPR and conduct Data Protection Impact Assessments (DPIAs) where required. All staff handling sensitive data receive regular training.

8. Data Subject Rights

Individuals have the following rights:

- Access
- Rectification
- Erasure
- Restriction
- Objection
- Data portability
- Rights related to automated decision-making

Requests are handled in accordance with our **Data Subject Rights Procedure**.

9. Review and Updates

This APD is reviewed if:

- Processing activities change
- Legislation or regulatory guidance changes
- New risks are identified