

HELPSTON PARISH COUNCIL

Digital & Data Governance Policy 2026

UK GDPR, Data Protection Act 2018 & AGAR Assertion 10 Compliance Policy

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ACCESSIBILITY NOTE: When publishing this document on the Council website, it should be exported as a tagged PDF where practicable. Use structured headings and ensure accessibility checks are completed in accordance with Public Sector Bodies (Websites and Mobile Applications) Accessibility Regulations 2018.

1. Purpose

This policy establishes the framework by which Helpston Parish Council governs digital systems, information management and personal data. The Council recognises that it holds and processes information in both digital and paper form and must ensure that such information is handled lawfully, securely and transparently.

This policy supports compliance with:

- UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- Freedom of Information Act 2000
- Environmental Information Regulations 2004
- Public Sector Bodies (Websites and Mobile Applications) Accessibility Regulations 2018
- AGAR Assertion 10 – Information Governance

This policy also serves as the Council's IT Policy for the purposes of AGAR Assertion 10 and the SAPPP 2025 Practitioners' Guide.

2. Scope

This policy applies to all councillors, the Clerk and any staff, contractors or volunteers handling Council information. It covers all personal data, corporate information, digital systems, devices, storage platforms and paper records.

3. Governance Principles

- Personal data will be processed lawfully, fairly and transparently.
- Data will be collected only for specified and legitimate purposes.
- Information will be adequate, relevant and limited to what is necessary.
- Data will be accurate and kept up to date where required.
- Information will be retained only as long as necessary.
- Appropriate technical and organisational security measures will be maintained.

4. Council Domain, Email and Digital Systems

The Council will conduct official business using Council-owned systems and accounts. Councillors and staff must use Council domain email accounts for Council business. Personal email accounts must not be used for Council business where Council systems are available. Where use is genuinely unavoidable in exceptional circumstances, records must be copied promptly to the Council's official systems to ensure proper retention and auditability

Digital systems used by the Council (such as cloud platforms, document storage, and email services) must be owned, controlled and administered by the Council to ensure continuity and security.

5. Website and Accessibility

The Council will maintain a website which complies with WCAG 2.2 AA in accordance with the Public Sector Bodies (Websites and Mobile Applications) Accessibility Regulations 2018, and will maintain an up-to-date Accessibility Statement on the website. The website will publish agendas, minutes, policies, financial information and statutory transparency data.

6. Data Protection and UK GDPR Compliance

The Council processes personal data in accordance with the principles of UK GDPR and the Data Protection Act 2018. Personal data will only be processed where there is a lawful basis such as a public task, legal obligation, consent or contractual requirement. The Council maintains a public-facing Privacy Notice setting out how personal data is processed, which is published on the Council website. The Council also maintains a Record of Processing Activities (ROPA) as part of its data governance records.

Individuals have the following rights:

- The right to be informed about how their data is used.
- The right of access to their personal data.
- The right to request correction or deletion where appropriate.
- The right to object to or restrict certain processing.

7. Data Security

The Council will implement appropriate technical and organisational measures to protect information including secure passwords, access controls, backups and device security. Two-factor authentication should be used where available.

8. Data Breaches

Any actual or suspected personal data breach must be reported immediately to the Clerk. The Clerk will assess the risk and determine whether the breach must be reported to the Information Commissioner's Office within 72 hours in accordance with UK GDPR requirements.

9. Records Management and Retention

The Council maintains and periodically reviews a Document Retention Schedule, which is formally adopted by Council and supports this policy. The schedule sets out how long categories of records should be retained. Personal data and other information will be securely deleted or destroyed when no longer required.

10. Roles and Responsibilities

The Parish Council is the Data Controller. The Clerk acts as the Council's lead officer for information governance and is responsible for the administration of systems, monitoring compliance and reporting risks or breaches.

Councillors must protect any information they access in the course of Council duties and must use Council systems for Council business. The Council is not required to appoint a Data Protection Officer. The Clerk fulfils the Council's information governance responsibilities as set out in this policy.

11. AGAR Assertion 10 Compliance

The Council will maintain appropriate evidence demonstrating compliance with AGAR Assertion 10, including:

- Council-owned domain and email accounts
- Website accessibility statement and compliance checks
- Records of processing activities or data inventory

- Backup and security arrangements
- Removal of access when councillors or staff leave office
- Annual review of this policy
- Adopted Privacy Notice published on the Council website
- Document Retention Schedule formally adopted by Council
- This policy adopted as the Council's IT Policy for Assertion 10 purposes
- The Council maintains a current registration with the Information Commissioner's Office (ICO).

12. Review

This policy will be reviewed annually or sooner if legislation or guidance changes.