



MANNINGTREE TOWN COUNCIL

Data Protection Road Map

(GDPR & UK Data Protection Act 2018)

This Data Protection Road Map sets out how Manningtree Council meets its data protection duties under:

- UK GDPR
- Data Protection Act 2018
- NALC General Data Protection Regulation Toolkit & guidance
- Information Commissioner's Office

Roles & Responsibilities

Data Protection Lead

- Role: Clerk/RFO
- Responsibility: Day-to-day compliance, advice to councillors, record-keeping
Councillors
- Act as data handlers
- Follow council policies
- Raise any data protection concerns immediately with the Clerk
Full Council
- Ultimately accountable
- Approves policies
- Receives annual data protection report

ICO Registration

- Manningtree Town Council is registered with the ICO under the Data Protection Regulations 2018
- Registration is reviewed and renewed annually at a formal meeting.
- ICO registration certificate retained by the clerk.

Data Audit & Record of Processing

The Parish Clerk maintains a Record of Processing Activities and the following policies are adopted by the council:

- Retention of Documents and Records Management Policy
- Data Protection Audits (annual)
- Litter Pick activities

| Data Category | Data Subjects | Purpose | Lawful Basis | Retention |
|-------------------------|----------------------|------------------------|---------------------|------------------|
| Clerk payroll | Clerk | Employment & payroll | Legal obligation | 6 years |
| Councillor details | Councillors | Council administration | Public task | Term + 6 yrs |
| Resident correspondence | Residents | Council business | Public task | 2–6 years |
| Meeting minutes | Public | Democratic record | Legal obligation | Permanent |

| Data Category | Data Subjects | Purpose | Lawful Basis | Retention |
|----------------------|----------------------|---------------------|---------------------|------------------|
| Contractor details | Suppliers | Contract management | Contract | 6 years |

Lawful Basis

The Council relies mainly on:

- Public Task – core council business
- Legal Obligation – audit, employment, governance
- Contract – Clerk and contractors (grass cutting, beach and Town maintenance)

Privacy Notices

The Council adopts NALC-model Privacy Notices, tailored locally:

- General Privacy Notice (public & residents)
- Clerk/Staff Privacy Notice
- Website Privacy Statement

Publication

- Council website/email footers
- Available on request

Data Security (Proportionate Controls)

Clerk

- Council data stored separately from personal data
- Password-protected laptop/email
- Secure cloud storage

Councillors

- Use council email
- Avoid storing personal data long-term
- Delete council data when no longer required

Training & Awareness

| Who | Training |
|-------------|--------------------------------------|
| Clerk | GDPR refresher annually |
| Councillors | GDPR awareness on election/co-option |

Training includes:

- SLCC/NALC resources
- Short internal/external briefings
- Documented self-learning

Subject Access Requests (SARs)

Process

1. Requests received by Clerk
2. Identity verified
3. Information collated
4. Response issued within 1 month
5. A log **SAR Log** is maintained by the parish clerk.

Data Breaches

What Counts

- Lost paperwork
- Email sent to wrong recipient
- Unauthorised access to data

Response

1. Clerk assesses risk
2. Breach logged
3. ICO notified within 72 hours if required
4. Individuals informed where appropriate

Third Parties & Contractors

The Council uses a small number of trusted suppliers:

- Payroll provider
- Website host
- Internal auditor
- Grass Cutting contractor
- Handy Man
- Play equipment (repairs and inspections)

Controls

- Written contracts in place
- GDPR clauses included
- Review of suppliers as necessary

Retention & Disposal

- Records retained in line with NALC retention guidance
- Secure disposal:
 - Shredding (paper)
 - Permanent deletion (digital)
- Disposal recorded where appropriate

Review & Assurance

| Area | Frequency |
|------------------|------------------------------|
| ICO registration | Annual |
| Policies | Annual |
| Data audit | Annual |
| Training | On appointment and refresher |

The Clerk provides a brief annual data protection report to Full Council.

Manningtree Town Council applies data protection controls that are appropriate to its size, activities, and risk profile, in line with ICO guidance and NALC best practice.

Date of policy: 16/04/2026

Approving committee: MTC

Date of committee meeting:

Policy version reference: 1

Supersedes: N/A

Policy effective from: 16/04/2026

Date for next review: 16/04/2027