



## Appropriate Policy Document

### 1. Purpose of this Document

This Appropriate Policy Document explains how Heath Hayes & Wimblebury Parish Council protects and manages special category personal data in line with the UK GDPR and the Data Protection Act 2018. As a Parish Council, we generally process small amounts of personal data but may occasionally handle special category data such as health information, racial or ethnic origin, or trade union membership.

### 2. Lawful Basis and Conditions for Processing

The Council processes special category data only when a valid Article 6 lawful basis applies, and a corresponding Article 9 or Schedule 1 DPA 2018 condition applies. Common conditions include employment law, substantial public interest, explicit consent, or information made public by the individual.

### 3. Data Protection Principles

The Council complies with the UK GDPR principles: lawfulness, fairness and transparency; purpose limitation; data minimisation; accuracy; storage limitation; integrity and confidentiality; accountability.

### 4. Security Measures

The Council uses proportionate safeguards, including password-protected devices, locked storage, restricted access, secure email practices, Councillor/staff training, and breach reporting procedures.

### 5. Retention and Erasure

Special category data is kept only as long as necessary according to the council's retention schedule and statutory requirements. When no longer required, data is securely destroyed, deleted, or anonymised.

**Signed:** L Wilson

**Dated:** 4<sup>th</sup> March 2026

**Minute Reference:** 03/26/192.2