

Tasley Parish Council

Data Protection & Information Governance – Good Practice Action Plan (12 Months)

Prepared as part of Internal Audit Follow-Up

In line with UK GDPR, Data Protection Act 2018, ICO guidance for Town and Parish Councils, and NALC / SLCC Practitioners' Guide 2025

1. Purpose of This Document

This document is provided as a supportive internal audit note to assist Tasley Parish Council in maintaining and strengthening good practice in relation to data protection and information governance over the next 12 months.

It is intended as proportionate guidance for a small parish council, rather than a compliance directive, and recognises that arrangements should be appropriate to the size and resources of the Council.

2. General Observations (High-Level Review)

A review of publicly available website information suggests that the Council is actively engaged in its governance responsibilities, including the publication of agendas and minutes.

However, as is common in many smaller councils, information relating to data protection and privacy is not always clearly signposted or brought together in a single, easily identifiable location.

This does not necessarily indicate any deficiency in practice, but rather an opportunity to improve clarity and accessibility of information.

3. Data Protection – Good Practice Framework

Parish councils are recognised as data controllers under UK data protection legislation. In practice, this means the Council should be able to demonstrate that personal data is handled responsibly, proportionately, and transparently.

For smaller authorities, the Information Commissioner's Office recognises that a simplified and proportionate approach is appropriate, provided the core principles of good data handling are met.

4. Key Areas of Good Practice

4.1 Core Policies and Procedures

The Council may wish to ensure that the following documents are in place and accessible:

- Privacy Notice (explaining how personal data is used)
- Data Protection Policy (or equivalent statement)

- Records Retention Guidance or Schedule
- Data Breach Procedure (including reporting steps)
- Subject Access Request (SAR) process guidance

These do not need to be complex, but should be clear and fit for purpose.

4.2 Website Transparency Pages

It is generally helpful for councils to have a small number of clearly identifiable pages covering:

- Privacy information
- Cookies information (if applicable)
- Accessibility statement

Where these are already in place, ensuring they are easy to locate from the main website menu can improve transparency.

4.3 Handling of Personal Data in Publications

Meeting agendas, minutes, and supporting papers may occasionally contain personal data.

Good practice would suggest that the Council continues to:

- Consider appropriate redaction where necessary
- Avoid unnecessary publication of personal data
- Apply a consistent approach to document publication and retention

This helps ensure that transparency is balanced with appropriate data protection principles.

5. Governance Structure and Accessibility

It may be helpful for the Council to consider whether information relating to data protection could be brought together in a single location, for example:

- A “Privacy & Data Protection” page within the website

This would assist residents in easily locating relevant information and support a clearer audit trail of policies and procedures.

6. Proportionate Approach for Smaller Councils

It is acknowledged that smaller parish councils operate with limited resources. The ICO and sector guidance both recognise that compliance arrangements should be proportionate.

In practice, this usually means:

- Keeping documentation simple and practical
- Ensuring key policies exist and are followed
- Maintaining awareness of how personal data is used
- Reviewing arrangements periodically rather than frequently overhauling them

In most cases, a designated data protection lead (often the Clerk) is sufficient, rather than more formal arrangements.

7. Suggested 12-Month Improvement Approach

A gradual approach may be helpful, such as:

- Confirming core policies are in place and up to date
 - Creating a single location for privacy and data protection information
 - Reviewing how personal data appears in published documents
 - Ensuring retention practices are understood and consistently applied
-

8. Closing Comment

The Council appears to be carrying out its responsibilities appropriately for a small authority.

The suggestions in this document are intended simply to support clarity, consistency, and good practice over time, rather than to indicate any significant concern.