



Mattingley
Parish Council

IT POLICY 2026

INTRODUCTION

1. The 2025 Practitioners' Guide introduces a requirement for an IT Policy to strengthen governance and compliance. Paragraph 1.54 of the Practitioners' Guide 2025 states:
'All smaller authorities (excluding parish meetings) must... have an IT policy. This explains how everyone – clerks, members and other staff – should conduct authority business in a secure and legal way when using IT equipment and software. This relates to the use of authority-owned and personal equipment.'
2. As per NALC Guidance:
'An IT policy helps parish and town councils set clear expectations for the appropriate use of IT equipment and systems, raise awareness of potential risks associated with IT use, safeguard the council's data and digital assets... Having a robust IT policy isn't just about compliance. It's about good governance and digital resilience.'

SCOPE

- 3 The Parish Council recognises the importance of effective and secure information technology (IT) and email usage in supporting its business, operations and communications.
- 4 This policy applies to council members and the clerk. By adhering to this Policy, the Parish Council aims to create a secure and efficient IT environment that supports its mission and goals.

ACCEPTABLE USE OF IT RESOURCES AND EMAIL

- 5 IT and email resources are for council related activities. Users must follow ethical standards, respect copyright and Intellectual Property rights and avoid offensive or inappropriate content.

DEVICE MANAGEMENT AND SECURITY

- 6 All devices used for council business should run the latest version of operating systems available to them where this is practicable, with updates applied; and ensure necessary security and anti-virus protection is up to date.

DATA MANAGEMENT AND SECURITY

- 7 Confidential data must be stored and transmitted securely using encrypted or approved systems. Data should be regularly backed up and secure disposal procedures must be followed.

NETWORK AND INTERNET USAGE

- 8 Internet usage should be responsible and efficient for official purposes. Downloading and sharing copyrighted material without proper authorisation is prohibited.

EMAIL COMMUNICATION

- 9 Email accounts provided by the Parish Council are for official communication only. Emails should be professional and respectful in tone. Confidential or sensitive information must not be sent via email unless it is encrypted.
- 10 Attachments and links must be treated with caution to avoid phishing and malware. Verify the source before opening any attachments or clicking on links.

PASSWORD ACCOUNT SECURITY

- 11 Parish Council IT users are responsible for maintaining the security of their accounts and passwords. Enable multi-factor authentication (MFA) wherever possible.

MOBILE DEVICES AND REMOTE WORK

- 12 Mobile devices should be secured with passcodes and/or biometric authentication. When working remotely, users should follow the same security practices as if they were in the office.

RETENTION AND ARCHIVING

- 13 Emails must be retained in line with the Council's [Data and Document Retention Policy](#) and legal requirements. Non-essential emails should be deleted regularly in line with Data Protection.

REPORTING SECURING INCIDENTS

- 14 All suspected security breaches or incidents should be communicated immediately to all relevant parties; the clerk being the designated point of IT contact to further investigation and resolution.

TRAINING AND AWARENESS

- 15 The Parish Council promote awareness of IT and email security best practices, and will provide training and resources as required.

POLICY REVIEW

- 16 This policy will be reviewed as necessary to ensure its relevance and effectiveness.



DOCUMENT RETENTION POLICY 2026

INTRODUCTION

The Parish Council recognises that the efficient management of its records is necessary to comply with its legal and regulatory obligations and to contribute to the effective overall management of the Council.

This policy applies to all records created, received, or maintained by the Parish Council while carrying out its functions. Records are defined as all those documents which facilitate the business carried out by the Council and which thereafter retained (for a set period) to provide evidence of its transactions or activities. These records may be created, received, or maintained in hard copy and/or electronically.

A small percentage of Parish Council's records will be selected for permanent preservation as part of the Council's archives and for historical research.

RESPONSIBILITIES

The Parish Council has a corporate responsibility to maintain its records and record management systems in accordance with the regulatory environment. The person with overall responsibility for the implementation of this policy is the Town Clerk, and they are required to manage the Council's records in such a way as to promote compliance.

RETENTION SCHEDULE

Under the Freedom of Information Act 2000, the Council is required to maintain a retention schedule outlining how long they hold different types of records and what actions are taken when they are no longer needed. The retention schedule lays down the length of time which the record or document needs to be retained and the action which should be taken when it is of further administrative use ensuring full compliance with the Data Protection Act 2018, which came into force on 25 May 2018 which gives effect to UK law to the UK General Data Protection Regulations (UK GDPR).

The Parish Clerk is expected to manage the current record keeping systems using the retention schedule and to take account of the different retention periods when creating new record keeping systems. The retention schedule refers to record series regardless of the media in which they are stored.

[See Document Retention Schedule \(overleaf\)](#)

PARISH COUNCIL DOCUMENT RETENTION SCHEDULE

Records/Documents	Minimum Retention Period	Reason
Administration		
Minute books	Indefinite	Archive
Meeting documents	Until no administrative requirement	Operational Common Practice
Councillor documents e.g Declarations of Acceptance of Office Code of Conduct, Register Interests	1 year after vacating office	Operational
Trusts, Title Deeds, Conveyances	Indefinite	Archive / audit management
Leases, agreements, contracts wayleaves	Indefinite	Archive / audit management
Scale of fees and charges	6 years	Management
Correspondence - general	Until no administrative requirement	Operational
Complaints, FOI requests	6 years after resolution	Operational
Financial		
Annual Returns /Accounts	Indefinite	Audit
Bank Statements	Last completed audit year	Audit
Paid invoices	6 years	VAT
VAT claims/records	6 years	VAT / audit / legal
Quotations and Tenders	6 years	Limitation Act 1980 (as amended)
Asset Register	Indefinite	Audit / management
Insurance policies	Whilst valid	Audit / management
Certificates for insurance against liability for employees/employers	Indefinitely	Future claims
Members allowance register (if applicable)	6 years	Tax, Limitation Act 1980
PAYE/NI records	6 years	Audit / legal
Historical /Local Information		
Village Plans/Projects	Until no administrative requirement	Operational
Maps or historical documents including Rights of Way	Indefinitely	Archive / historical
Local and other publications	Until no administrative requirement	Operational
Any historical documents pre-dating the parish council or not council related	Indefinitely	Archive / historical
Council owned publications press cuttings, photographs	Indefinitely	Archive / historical



FREEDOM OF INFORMATION PUBLICATION SCHEME 2026

Ref the ICO Information Commissioner's Office) Model Publication Scheme.

BACKGROUND

Under the Freedom of Information Act, it is the duty of every public authority to adopt and maintain a publication scheme. Publication schemes facilitate the proactive release of information and play a crucial role in supporting and providing greater openness and transparency across the public sector.

The Parish Council's publication scheme defines information that the Council holds which is accessible to members of the public. The Parish Council strives make local government information more easily accessible and to promote the work it does.

POTENTIAL CHARGES

Where a member of the public is seeking to obtain a hard copy of information included in this Council's publication scheme, the Council may set reasonable charges for this.

CONFIDENTIALITY NOTICE

The Parish Council's policy is to be as open as possible and supply the information requested but the Council may withhold any information if it considers its release not to be in the public interest. All information relating to private individuals is excluded from the scheme by virtue of it being personal data under the Data Protection Act 2018.

REQUESTS FOR INFORMATION

Anyone can request information in writing. The request must include details of the applicant and the information sought. The applicant has two rights – to be told whether the information is held by a local council – and to receive the information as a copy or summary, if considered to be in the public interest. The Council must respond within 20 days of the request. If a fee is required, the Council can extend this period up to three months until the fee is paid.

[See Publication Schedule \(overleaf\)](#)

FREEDOM OF INFORMATION PUBLICATION SCHEDULE

Information available from the Parish Council under the model publication scheme
<https://ico.org.uk/media/for-organisations/documents/1153/model-publication-scheme.pdf>

INFORMATION TO BE PUBLISHED

HOW THE INFORMATION CAN BE OBTAINED

Class 1 - Who we are and what we do

(Organisational information, structures and contacts)

Contact details for Parish Clerk

Parish Council website

Parish Councillors

Parish Council website

Class 2 – What we spend and how we spend it

(Financial information relating to budgets, income and expenditure, and financial audit)

Accounts to date – see Appendices attached to minutes *Parish Council website*

Year End Accounts

Parish Council website

Annual Governance and Accountability Returns (AGAR) *Parish Council website*

Class 3 – What our priorities are and how we are doing

(Strategies and plans, performance indicators, audits, inspections and reviews)

Budget, Precept setting and audit

Parish Council website

Parish Assembly minutes, Parish Council meeting minutes *Parish Council website*

Class 4 – How we make decisions

(Decision making processes and records of decisions)

Minutes of meetings

Parish Council website

Meeting notice and agendas

Parish Council website

Responses to planning applications

hart.gov.uk/planning
also referenced in minutes

Responses to consultations

consultation website and referenced in minutes.

Class 5 – Our policies and procedures

(Written protocols, policies and procedures for delivering our services and responsibilities)

Standing orders

Parish Council website

Code of conduct

Parish Council website

Financial Regulations and Risk Management Register *Parish Council website*

IT, data protection, retention and FOI policies *Parish Council website*

General procedural policies

Parish Council website

Model biodiversity policy

Parish Council website

Class 6 – Lists and Registers

(Any publicly available register or list (if any are held this should be publicised; in most circumstances existing access provisions will suffice)

Assets Register

Parish Council website

Register of members' interests <https://hart.moderngov.co.uk/mgParishCouncilDetailsList.aspx>

Class 7 – The services we provide *Parish Council website*

- Parish maintenance and Highways upkeep including public footpaths
This includes support from the Parish Lengthsman Scheme funded via Hampshire County Council @ c 30 hours per year
- Maintenance and upkeep of Hound Green
- Maintenance and upkeep of Parish Council-owned street furniture
- Maintenance and upkeep of the bus shelter war memorial
- Defibrillators
- Joint working with partner organisations eg, borough and county councils.



DATA AND INFORMATION PROTECTION POLICY 2026

1. INTRODUCTION

To conduct its business, services and duties, the Parish Council processes a range of data, relating to its own operations and some which it handles on behalf of partners. In broad terms, this data can be classified as:

- Data shared in the public arena about the services it offers, its mode of operations and other information it is required to make available to the public.
- Confidential information and data not yet in the public arena such as ideas or policies that are being worked up.
- Confidential information about other organisations because of commercial sensitivity.
- Personal data concerning its current, past and potential councillors, employees and volunteers.
- Personal data concerning individuals who contact it for information, to access its services or facilities or to make a complaint.

The Parish Council will manage responsibly, and adopt procedures to manage, all data which it handles and will respect the confidentiality of both its own data and that belonging to partner organisations and members of the public. In some cases, it will have contractual obligations towards confidential data, but in addition will have specific legal responsibilities for personal and sensitive information under data protection legislation.

The Parish Council will periodically review and revise this policy in the light of experience, comments from data subjects and guidance from the Information Commissioner's Office.

The Parish Council will be as transparent as possible about its operations and will work closely with the public and with community and voluntary organisations. Therefore, in the case of all information which is not personal or confidential, it will be prepared to make it available to partners and members of the community. Details of information which is routinely available is contained in the Parish Council's Publication Scheme which is based on the statutory model publication scheme for local councils.

2. PROTECTING CONFIDENTIAL OR SENSITIVE INFORMATION

The Council recognises it must at times, keep and process sensitive and personal information about both employees and the public, it has therefore adopted this policy not only to meet its legal obligations but to ensure high standards.

The General Data Protection Regulation (GDPR) which became law on 25th May 2018 seeks to strike a balance between the rights of individuals and the sometimes, competing interests of those such as the Parish Council with legitimate reasons for using personal information.

The policy is based on the premise that personal data must be:

- Processed fairly, lawfully and in a transparent manner in relation to the data subject.
- Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.
- Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
- Accurate and, where necessary, kept up to date.
- Kept in a form that permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed.
- Processed in a manner that ensures appropriate security of the personal data including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

3. DATA PROTECTION TERMINOLOGY

Data subject - means the person whose personal data is being processed.

That may be an employee, prospective employee, associate or prospective associate of the Council or someone transacting with it in some way, or an employee, Member or volunteer with one of our clients, or persons transacting or contracting with one of our clients when we process data for them.

Personal data - means any information relating to a natural person or data subject that can be used directly or indirectly to identify the person

It can be anything from a name, a photo, and an address, date of birth, an email address, bank details, and posts on social networking sites or a computer IP address.

Sensitive personal data - includes information about racial or ethnic origin, political opinions, and religious or other beliefs, trade union membership, medical information, sexual orientation, genetic and biometric data or information related to offences or alleged offences where it is used to uniquely identify an individual.

Data controller - means a person who (either alone or jointly or in common with other persons) (e.g. the Council, employer, council) determines the purposes for which and the manner in which any personal data is to be processed.

Data processor - in relation to personal data, means any person (other than an employee of the data controller) who processes the data on behalf of the data controller.

Processing information or data - means obtaining, recording or holding the information or data or carrying out any operation or set of operations on the information or data, including:

- organising, adapting or altering it
- retrieving, consulting or using the information or data
- disclosing the information or data by transmission, dissemination or otherwise making it available
- aligning, combining, blocking, erasing or destroying the information or data. regardless of the technology used.

4. THE COUNCIL PROCESSES PERSONAL DATA IN ORDER TO:

- fulfil its duties as an employer by complying with the terms of contracts of employment, safeguarding the employee and maintaining information required by law.
- pursue the legitimate interests of its business and its duties as a public body, by fulfilling contractual terms with other organisations, and maintaining information required by law.
- monitor its activities including the equality and diversity of its activities
- fulfil its duties in operating the business premises including security
- assist regulatory and law enforcement agencies
- process information including the recording and updating details about its Councillors, employees, partners and volunteers.
- process information including the recording and updating details about individuals who contact it for information, or to access a service, or make a complaint.
- undertake surveys, censuses and questionnaires to fulfil the objectives and purposes of the Council.
- undertake research, audit and quality improvement work to fulfil its objects and purposes.
- carry out council administration.

Where appropriate and governed by necessary safeguards the Parish Council will carry out the above processing jointly with other appropriate bodies from time to time.

The Parish Council will ensure that at least one of the following conditions is met for personal information to be considered fairly processed:

- The individual has consented to the processing
- Processing is necessary for the performance of a contract or agreement with the individual
- Processing is required under a legal obligation
- Processing is necessary to protect the vital interests of the individual
- Processing is necessary to carry out public functions
- Processing is necessary to pursue the legitimate interests of the data controller or third parties.

Attention is paid to the processing of any sensitive personal information and the Council will ensure that at least one of the following conditions is met:

- Explicit consent of the individual
- Required by law to process the data for employment purposes
- A requirement to protect the vital interests of the individual or another person

5. WHO IS RESPONSIBLE FOR PROTECTING A PERSON'S PERSONAL DATA?

The Parish Council as a corporate body has ultimate responsibility for ensuring compliance with the Data Protection legislation. The Council has delegated this responsibility day-to-day to the Parish Clerk.

Public authorities are required to appoint a Data Protection Officer. However, as per Information Commissioner's Office advice Parish and community councils are not considered public authorities for this requirement.

<https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/accountability-and-governance/guide-to-accountability-and-governance/data-protection-officers/>

6. PERSONAL DATA PROVIDED TO US

The information provided (personal information such as name, address, email address, phone number) will be processed and stored so that it is possible for us to contact, respond to or conduct the transaction requested by the individual. By transacting with the Parish Council, individuals are deemed to be giving consent for their personal data provided to be used and transferred in accordance with this policy, however where ever possible specific written consent will be sought. It is the responsibility of those individuals to ensure that the Parish Council can keep their personal data accurate and up-to-date. The personal information will be not shared or provided to any other third party or be used for any purpose other than that for which it was provided.

7. THE COUNCIL'S RIGHT TO PROCESS INFORMATION

General Data Protection Regs (and Data Protection Act) Article 6 (1) (a) (b) and (e)

- Processing is with consent of the data subject, or
- Processing is necessary for compliance with a legal obligation.
- Processing is necessary for the legitimate interests of the Parish Council.

8. INFORMATION SECURITY

The Council takes care to ensure the security of personal data and will make sure that information is protected from unauthorised access, loss, manipulation, falsification, destruction or unauthorised disclosure. This is done through appropriate technical measures and appropriate policies.

The Council will only keep personal data for the purpose it was collected for and only for as long as is necessary, after which it will be deleted.

9. CHILDREN

We will not process any data relating to a child (under 13) without expressed parental/ guardian consent.

10. RIGHTS OF A DATA SUBJECT

- Access to Information: an individual has the right to request access to the information the Parish Council has in relation to them. They can do this by contacting the Parish Clerk.
- Information Correction: If they believe that the information the Parish Council has about them is incorrect, they may contact us so that we can update it and keep their data accurate.
- Information Deletion: If the individual wishes the Parish Council to delete the information about them, they can do so by contacting the Parish Clerk.
- Right to Object: If an individual believes their data is not being processed for the purpose it has been collected for, they may object by contacting the Parish Clerk.
- The Parish Council does not use automated decision making or profiling of individual personal data.
- Complaints: If an individual has a complaint regarding the way their personal data has been processed, they may make a complaint to the Parish Clerk or the Information Commissioner's Office casework@ico.org.uk Tel 0303 123 1113.
- The Parish Council will ensure that individuals on whom personal information is held are aware of their rights and have easy access to that information on request.

11. DATA TRANSPARENCY – PUBLIC DATA

The Council will act in accordance with the Code of Recommended Practice for local Authorities on Data Transparency (September 2011). This sets out the key principles for local authorities in creating greater transparency through the publication of public data and is intended to help them meet obligations of the legislative framework concerning information.

Public data means the objective, factual data on which policy decisions are based and on, on which public services are assessed, or which is collected or generated in the course of public service delivery. The Code will therefore underpin the Council's decisions on the release of public data and ensure it is proactive in pursuing best practice as it develops.

The principles of the Code are

- Demand led – publication of data should support transparency and accountability
- open – the provision of public data will be integral to the Parish Council's engagement with residents
- Timely – data will be published as soon as possible following production.