HORNDEAN PARISH COUNCIL
SPECIAL CATEGORY DATA POLICY

1. Purpose

This policy sets out how the Parish Council handles *special category data* in compliance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. Special category data includes information relating to:

- Racial or ethnic origin
- Political opinions
- Religious or philosophical beliefs
- Trade union membership
- Genetic or biometric data
- Health data
- Sex life or sexual orientation

The Council recognises that this data requires additional protection due to its sensitive nature.

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2. Lawful Basis and Conditions for Processing

The Parish Council will only process special category data when:

- A lawful basis under Article 6 UK GDPR applies **and**
- A specific condition under Article 9 UK GDPR is met (e.g. explicit consent, employment obligations, safeguarding interests, or substantial public interest).

Where processing relies on **explicit consent**, consent must be freely given, specific, informed, and recorded.

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3. How Special Category Data Is Used

Special category data may be processed for limited purposes, including:

- Managing employment, payroll, health and safety, or equality monitoring
- Handling safeguarding concerns
- Delivering community services where health or vulnerability information is relevant
- Responding to statutory obligations (e.g., electoral matters, legal claims)

The Council will not collect more data than necessary for the specific purpose.

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4. Storage, Security and Access

- Special category data is held securely (password protection, restricted access, encrypted storage where appropriate).
- Only authorised councillors, employees or processors may access this data.
- Paper records are kept in locked storage.
- Digital files are stored on secure, access-controlled systems.

5. Sharing and Retention

Special category data will only be shared when legally required or with the individual's explicit consent.
Retention periods are kept as short as necessary and follow the Council's adopted retention schedule. Data is securely destroyed when no longer required.

6. Rights of Individuals

Individuals have rights to:

- Access their data
- Request correction or deletion
- Restrict or object to processing
- Withdraw consent (where applicable)

Requests will be handled in line with statutory timescales.

7. Data Breaches

Any suspected breach involving special category data must be reported immediately to the Clerk or Data Protection Officer. Serious breaches will be reported to the ICO within 72 hours as required.

8. Review

This policy will be reviewed annually or sooner if legislation or Council practices change.

Adopted: 09/03/2026

Review Date: March 2027