



Andover Town Council

Item
No.

To **review** the attached draft Data Protection Policy and Procedure and annexed Privacy and Cookie Policy; and **recommend** the drafts to Full Council for approval.

To: Policy and Resources Committee

From: Town Clerk and Policies Working Group

Date of Report: 17 December 2025

Recommendations:

It is recommended that Policy and Resources Committee:

- I. review the attached draft [Data Protection Policy and Procedure](#) and annexed Privacy and Cookie Policy; and
- II. recommend the drafts to Full Council for approval.

Background:

In October 2025, Full Council noted that the Policies Working Group would be concentrating on revising the most complex policies in the light of changing legislation. As advised, the Policies Working Group has now reviewed the Council's current Data Protection Policy, Privacy and Cookie Policy and Privacy Statement.

Advice

The current data protection laws in the UK are primarily governed by the Data Protection Act 2018 and the UK General Data Protection Regulation. While the Council's current policies and procedures meet general requirements and our use of personal data has not significantly changed, the Information Commissioner's Office (ICO) has published a great deal of guidance and advice the Council should consider.

The Policies Working Group has drafted the revised Data Protection Policy and Procedure in the light of latest guidance. The draft sets out the framework for ensuring the Council not only meets its statutory duties under data protection law but also gives our residents, service users and officers the highest assurance that the personal data is safe with the Council.

The draft also includes, for ease of reference, the revised Privacy and Cookie Policy, which once approved, will be added to the Council's website separately to replace the existing version.

As the ICO's advice is now that records of processing activities (ROPA) should be both detailed and electronically available, the draft framework will include reference to a ROPA for all Council's business functions, for example, allotment services and employment. Once these are completed, there will be no need for a separate privacy notice, as at present.

The draft framework includes a commitment to ensuring officers undertake annual, mandatory training on information governance and security. This meets the Council's commitments in the Andover Town Council Business Plan 2025-27 and is especially important as the ICO updates guidance and advice following introduction of the Data (Use and Access) Act 2025.

Risks

There are both financial and reputational risks to the Council should a personal data breach occur as a result of not having an approved and up-to-date data protection policy and procedure in place.

Financial implications

There is a budget implication for ensuing annual training in information governance and security.

Next steps

If approved, the next steps will be for officers to complete ROPAs and data protection impact assessments for data processing that is considered higher risk data.