MINUTES

Of a meeting of the General Policy Working Group held on 15th January 2018 at 6pm in the Town Hall

Present: Cllr Callinan, Cllr Swain, Cllr Kambites, Town Clerk (Cllr Watt gave apologies)

1. GDPR

- Confirm the types of data held by the Council and the length of time it should be kept

The Group considered a draft Data Protection Process and agreed the content.

- Draw up a list of service providers who will need a contract with the Council

Jireh, Coconut, PATA, Young Gloucestershire, Scott Security will all need contracts. HMRC, Glos Pension Scheme and NEST also hold data but likely to have their own privacy statements and implied contract.

- Consider adopting an interim policy (whilst other guidance is awaited)

GAPTC had advised shredding old documentation but without a policy in place the staff could not act. The Working Group agreed that there should be an interim policy. The ICO state on their website that May 2018 is the date from which enforcement takes place but that organisations must be putting DP into practice before then. There will be some leniency in the learning curve. NALC have requested specialist support to parish councils. The Working Group considered a draft policy and would recommend that this is adopted.

- Consider data protection – is data secure?

Jireh confirmed (2/1/18) the integrity of the data systems but had suggested a Cyber Essential Audit which they can assist with.

- CCTV – set up an annual review of the necessity and security of the system

The Working Group agreed to review CCTV usage in February of each year. CCTV had been discussed with Young Gloucestershire. They will be having their own DP training and will come back with suggestions. They are data processors for the Council alongside Scott Security and Council staff in handling data for crime prevention purposes. Policy would be explained to all concerned so that data is not stored for longer than necessary and is only used in the correct way.

- Other matters which require clarification/advice

The Clerk advised that at a training seminar she was advised that councillors should be using Council laptops to correspond with data subjects. Councillors were reluctant to give up the opportunity of using their own equipment and one way round this might be to have a generic email address. This would be explored with GAPTC. Advice is still awaited regarding cost and appointment of a DPO.

2. Other Policies

Cllr Callinan will draw up a list for review. There is a need to standardise formatting. The Clerk requested that the group looks at the Health & Safety Policy first.

3. Date of Next Meeting

26th January 2018 2pm

**Stonehouse Town Council**

**DATA PROTECTION POLICY**

The Town Council holds and processes information about employees, Councillors and other data subjects for administrative purposes.
When handling such information, staff, Town Councillors and service providers who process or use any personal information, must comply with the Data Protection Principles which are set out in the General Data Protection Regulation.

**PRIVACY NOTICE**

**Data Subjects should note that any information given will be held securely and processed in accordance with the rules on data protection. We will not disclose your personal details to anyone unconnected to the Council unless:**

- **You have consented to their release, or**
- **We are legally obliged to disclose them or**
- **We regard disclosure as either (a) necessary so that we can properly carry out our statutory functions or (b) necessary in the public interest**

**We may share and disclose information about you with relevant public authorities, regulatory bodies and agencies, outside the Council but only if:**

- **We can lawfully do so**
- **We decide that disclosure is necessary for national security, crime detection, prevention, and law enforcement, or other issues in the public interest**

**Information we collect about you will be used:**

- **To enable us to carry out our statutory functions and duties which may include updating our records, assisting third parties to investigate or prevent crime and carry out law enforcement, data analysis, statistical and survey purposes**

**Information from our sources will be used:**

**In combination with the information above for the given purposes. We will ensure that any such disclosure and use is proportionate, considers your rights to respect for your private life, and is done fairly and lawfully in accordance with the GDPR**

**Data Controller RESPONSIBILITIES**

The Town Council (The Data Controller) will ensure that there is a process in place to ensure that personal and sensitive data will :

- be processed fairly and lawfully,
- be obtained for a specified and lawful purpose and shall not be processed in any manner incompatible with the purpose,
- be adequate, relevant and not excessive for the purpose
- be accurate and up-to-date,
- not be kept for longer than necessary for the purpose,
- be processed in accordance with the data subject's rights,
- be kept safe from unauthorised processing, and accidental loss, damage or destruction,
- not be transferred to a country outside the European Economic Area, unless that country has equivalent levels of protection for personal data, except in

specified circumstances.

The Town Council shall notify all staff, Town Councillors and other relevant data subjects of the types of data held and processed by the Town Council concerning them, and the reasons for which it is processed (Appendix 1). When processing for a new or different purpose is introduced the individuals affected by that change will be informed and the Appendix 1 will be amended.

The Town Council will carry out a risk assessment of its data processing every 12 months.

**Data Processor RESPONSIBILITIES**

All staff members shall:
ensure that all personal information which they provide to the Town Council in connection with their employment is accurate and up-to-date;
inform the Town Council of any changes to information, for example, changes of address;
check the information which the Town Council shall make available from time to time, in written or automated form, and inform the Town Council of any errors or, where appropriate, follow procedures for up-dating entries on computer forms. The Town Council shall not be held responsible for errors of which it has not been informed.

**All staff members and councillors and service providers** will comply with the GDPR in relation to data subjects:

- ensure that all data subject personal & sensitive information is kept securely;
- ensure that all personal & sensitive information is not disclosed either orally or in writing, accidentally or otherwise to any unauthorised third party.

**SUBJECT ACCESS REQUESTS**

Staff and other data subjects of the Town Council have the right to access any personal data that is being kept about them either on computer or in structured and accessible manual files. Any person may exercise this right by submitting a request in writing to the Town Clerk.
The Town Council aims to comply with requests for access to personal information as quickly as possible, but will ensure that it is provided within 40 days unless there is good reason for delay. In such cases, the Town Clerk will write to the subject making the request for data explaining the reason for the delay.
**(Freedom of Information requests are dealt with separately within a 20 working day time limit)**

**SUBJECT CONSENT**

In some cases, such as the handling of sensitive information, the Town Council is entitled to process personal data only with the consent of the individual. In this case the Town Council will request a written consent.

**COMPLIANCE**

Compliance with the GDPR is the responsibility of the Data Controller and Data Processors. Any individual, who considers that the policy has not been followed in respect of personal data about him, or herself, should raise the matter with the Clerk initially. If the matter is not resolved it should be referred to the **Data Protection Officer** who is

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**Any breach of compliance will be recorded and reported to the Data Subject and the Data Protection Officer. A risk assessment will be carried out to assess the consequences of any breach.**

**APPENDIX 1**

Council Information Processing

The Council has notified the Information Commissioner that personal information may need to be processed for the provision of council services.

The types of information that may be processed include:

personal details including images
family details
lifestyle and social circumstances
education and employment details
financial details
goods and services

We process personal information about:
Employees and applicants
suppliers
customers
complainants, enquirers
business contacts
professional advisers and consultants
residents of the parish
elected representatives and holders of public office
members of the council

The Public Register of Data Controllers on the Information Commissioner's web site contains full details of the Council's current registration.

The register entry provides:

-a fuller explanation of the purposes for which personal information may be used
-details of the types of data subjects about whom personal information may be held
-details of the types of personal information that may be processed
-details of the individuals and organisations that may be recipients of personal information collected by the Council
-information about transfers of personal information.

Data is held for the following periods:

| | |
|---|---|
| General Enquiries | During & Up to 3 months after enquiry resolved |
| Complaints | During & Up to 6 months after complaint resolved |
| Job Applications | During process/appointment – personnel record until employment ends/non-appointment deleted within 1 month |
| Supplier Invoices | 7 years |
| Supplier Bank details | Until supply ceases |
| Sales Invoices | 7 years |
| Personnel records | Until employment/pension obligations end |
| CCTV footage | 3 months/purpose reviewed every 12 months |
| Electoral Roll | Destroyed when out of date |
| Contact details/images Published on the website with consent | Deleted with written consent |
| Legal Documents | In perpetuity |
| Contract/Tenders | Until project ends & Up to 7 years |

| 17-18 | Draft Budget | 18-19 Standstill | Proposed |
|---|---|---|---|
| 130250 | F&S | 136120 | 143620 |
| 124100 | A&R | 118150 | 129000 |
| 17900 | Regen | 17900 | 21000 |
| -2700 | | -2920 | -2920 |
| -15550 | | -15250 | -15250 |
| 254000 | | 254000 | 275450 |
| | | | |
| 2361.73 | Tax Base | | 2399.85 |
| | | | |
| 107.5483 | Band D Payment | | 114.778 |

£7.23 increase per annum

6.72%

| Finance Committee | Budget | | Draft | Adjusted | |
|---|---|---|---|---|---|
| Expenditure | 17-18 | Predicted | 18-19 | by F & S | Explanations |
| Administration | **63000** | 59000 | 64000 | 67000 | allow for sick pay/temp cover/increases/DPO |
| GDPO | | | | 300 | |
| Chair Allowance | **100** | 55 | 100 | 100 | |
| Councillor Travel Expenses | | | | 200 | for meetings/training attendance |
| Training/Health&Safety | **2000** | 2000 | 2000 | 2000 | |
| Travel | **100** | 100 | 120 | 120 | |
| Town Hall Utilities & Telephone | **10000** | 15000 | 12500 | 12000 | GCC costs proposal would only remove rates cost |
| Admin Expenses | **4000** | 4000 | 4200 | 4200 | |
| Subscriptions | **2700** | 2300 | 2700 | 2700 | |
| Insurance | **4000** | 3600 | 4000 | 4000 | |
| Professional Fees | **6000** | 6000 | 6000 | 6000 | |
| Newsletter | **2900** | 2900 | 3000 | 3000 | |
| Grants | **5000** | 5000 | 5000 | 5000 | |
| Youth Bought Out Costs | **19300** | 17000 | 19500 | £25,000 | change in provider anticipated |
| Youth Building | **5500** | 4900 | 5500 | 5500 | |
| Neighbourhood Warden | **250** | 250 | 250 | 250 | |
| IT Software Hardware | **1500** | 1800 | 2500 | 2500 | allow for new laptop clerk |
| Website | **900** | 600 | 750 | 750 | change in provider |
| Election/Referendum Costs | **3000** | 0 | 2000 | 1000 | keep in reserve/add £1000 |
| Events Costs | | | 2000 | 2000 | new budget heading |
| | **130250** | 124505 | 136120 | 143620 | |
| | | | | | |
| **Income** | | | | | |
| General Income | **300** | 300 | 120.00 | | |
| Interest | **800** | 800 | 800.00 | | |
| Newsletter Advertising | **1200** | 1200 | 1200.00 | | |
| Feed in Tarriff | **400** | 700 | 800.00 | (if payable to Town Council?) | |
| Allow for Rent? | | | | ? | not known |
| | **2700** | 3000 | 2920.00 | | |

| ART Committee | 17-18 | | 18-19 | Adjusted | |
|---|---|---|---|---|---|
| **Expenditure** | **Budget** | **Predicted** | **Budget** | **by A&R** | **Explanations** |
| Groundstaff | **22700** | 16500 | 23500 | 24000 | |
| Groundstaff Prt-time | **9000** | 9000 | 9500 | 9700 | |
| Training | **800** | 500 | 500 | 800 | |
| Protective Clothing (H & S) | **600** | 600 | 600 | 600 | |
| Insurance | **8000** | 5000 | 6000 | 6000 | reduced as Stagholt pavilion and allotment sheds no longer on cover |
| Vehicle/Machinery Costs | **5500** | 4000 | 4500 | 4700 | |
| Mobile Phones | **400** | 400 | 450 | 450 | |
| Materials Costs | **2000** | 2000 | 2000 | 2000 | |
| Pavilion Utilities | **5000** | 4000 | 4000 | 5000 | electricity costs still a problem |
| Pavilion Mnt & Repairs | **5500** | 4000 | 3000 | 5000 | |
| Drainage Contract | **1500** | 800 | 1500 | 1500 | |
| General Maint (incl skip) | **3500** | 2000 | 3500 | 3500 | |
| Grasscutting | **20000** | 20000 | 20000 | 20000 | |
| Hedging/Trees/Fencing | **5000** | 4000 | 3500 | 4150 | some funding available Doverow Trust |
| Stagholt Brook | **0** | 0 | 0 | 0 | |
| Equipment Hire/Repairs | **1200** | 1200 | 1200 | 1200 | |
| Stonehouse in Bloom | **4000** | 4000 | 4300 | 4300 | |
| Bins/Street Furniture | **3000** | 3000 | 3000 | 3000 | |
| Christmas Lights | **4200** | 5000 | 5000 | 5000 | |
| Verges/Footpaths & Greens | **2000** | 1000 | 1200 | 1200 | |
| Play Equipment Maintenance | **3000** | 2000 | 500 | 2500 | |
| New Play Equipment | **0** | | 3000 | **7000** | increased to allow for match funding |
| Allotments | **0** | 590 | 0 | 0 | |
| Waste Contract | **5200** | 5200 | 5400 | 5400 | |
| Project Plans | **12000** | 35000 | 12000 | 12000 | |
| | **124100** | 129790 | 118150 | 129000 | |
| **Income** | | | | | |
| Pitch Hire | **2000** | 3200 | 3200 | | |
| Orange Rent | **5200** | 5200 | 5200 | | |
| Magpies Rent | **3100** | 3100 | 3100 | | |
| Misc Hire | **1000** | 800 | 500 | | meeting room may be inaccessible part of year |
| In Bloom | **3000** | 1700 | 1700 | | |
| Allotment Rents | **0** | 10 | 0 | | |
| Agency Income | **850** | 850 | 850 | | |
| Misc Income | **400** | 700 | 700 | | |
| | **15550** | 15560 | 15250 | | |

| **Regen Committee** | 17-18 | Predicted Spend | **18-19 Draft** | **Adjusted by Regen** | **Explanations** | RFO Comment |
|---|---|---|---|---|---|---|
| **Expenditure** | | | | | | |
| Staff | 14000 | 14000 | 14700 | 14700 | | |
| Training | 600 | 600 | 200 | 300 | | a |
| Feasibility Studies | Reserve | 0 | | | Bristol Rd study | |
| Neighbourhood Plan Review | 800 | 0 | | | not spent/carry forward to reserves | |
| Bus Shelter Maintenance | 1500 | 0 | 0 | 1000 | not spent/carry forward to reserves | |
| Traffic Calming | 1000 | 1000 | 1000 | 4000 | contribution to zebra crossing Oldends Lane | b |
| Other | | | 2000 | 1000 | tourist signs | c |
| | 17900 | 15600 | 17900 | 21000 | | |

a. CILCA already paid for - this budget not needed?

b. this should come from UBB fund or CIL

c. SDC town centre strategy allows for signage, they also have surplus carpark revenues