

# **COTHERSTONE PARISH COUNCIL**

## **GDPR documentation**

As at 3 May 2018

The following suite of documents has been drafted to demonstrate compliance with the General Data Protection Regulation which comes into force on 25 May 2018.

- Data Audit Schedule
  
- Councillor Privacy Notice
- Email contact Privacy Notice
- General Privacy Notice
  
- Data Breach Reporting form
- Subject Access Request form
  
- General Consent form
- Purchase of Exclusive Rights of Burial Consent Form
- Allotment tenant Consent Form
  
- Draft Document Retention and Disposal Policy
- Draft Information Data Protection Policy
- Draft Social Media policy

The documents will be kept under review and developed as necessary.

# Data Audit Schedule

## Inventory of Personal Data Captured, Stored and Processed by Cotherstone Parish Council

Inventory assembled on 30/4/18 and Last updated on 30/4/18

1. What Personal Data Do We Hold?			2. Lawful basis for holding personal data				3. Consent	4. Sharing Personal Data	5. Our internal processes				
To whom does it relate?	What data is it?	includes sensitive data?	What is it for?	Why do we have it?	Are we legally obliged to hold this data? NOTE: If we are legally obliged to hold it, no consent is needed.	Have we got a contract or privacy notice relating to the data subject?	If we have a contract with the data subject, does it demonstrate all necessary consents?	With whom do we share this data? LIST THEM ALL	Who is responsible for keeping this data?	How often is it checked?	How long do we keep it?	Where is it held? (Clerk = on Clerk's laptop and/or paper files at the Clerk's home office, then archived in locked cupboard at Cotherstone Village hall	Protection?
<b>Staff</b>													
	Contract of employment	Yes	HR	Contract of employment	Yes	Yes	Yes		Clerk	On appointment and on annual performance review	Duration of Employment plus 6 years	Clerk	Password/Lock & key
	PAYE	No		Legal requirement	Yes	Not required	Not applicable	External Professional Advisers; HMRC		Monthly			
	Bank details	No		To pay staff salaries	No	Contract	Yes	Barclays Bank		As necessary			
	Pension details	Yes		Legal requirement	Yes	Not required	Not applicable	External Professional Advisers; The Pension Regulator; HMRC		Duration of Employment			
	Leave Form	No		Employment Purposes	No	Yes	Yes	External Professional Advisers		Yearly			
	Staff Appraisals	Yes		Employment Purposes	No	Yes	Yes			As required			
<b>Councillors</b>													
	Declarations of Interest	Yes	Democracy	Legal requirement	Yes	Not required	Not applicable	This is public knowledge	Clerk	At election and annually	Term of Office plus 4 years	Clerk	Password/Lock & key
	Personal Contact Details	No											
<b>Contractors /Suppliers where we hold personal data of a natural person (not the data of a limited company or of another council)</b>													
	Contact details	No	Business	Contact	No	Contract	Yes	External Professional Advisers	RFO	When Appointed	See document Retention Policy	Clerk	Password/ Lock & key
	Invoices			Payment				Public inspection on audit					
	Purchase orders			Purchasing				Public inspection on audit					
	Quotations			Purchasing				Public inspection on audit					
	Bank Account details			Payment				Our bank					
	Insurance			Contract				External professional advisers					
	References			Contact				External professional advisers					
<b>Residents</b>													
	Electoral Register	No	Democracy	Democracy	No	Not applicable		Public document required by law, which we choose to hold.	Clerk	On receipt	1 year	Clerk	None required
	Complaints	Sometimes			No	Privacy Notice	Not applicable	no contract		External Professional Advisers, MPs, principal councils.	1 year		
	Freedom of Information requests	No			Yes	Privacy Notice				External Professional Advisers	2 years		
	General Correspondence from members of pub	Perhaps			No	Privacy Notice				External Professional Advisers, MPs, principal councils.	1 year		
<b>Community Organisations</b>													
	Email Addresses	No	Democracy	Contact	No	Privacy Notice	No contract	Nobody without consent	Clerk	On receipt	See document Retention Policy	Clerk	Password/ Lock & key
	Grant application forms	Perhaps		Service to community	No	Privacy Notice	No contract	External Professional Advisers		On receipt			
	Nominations of external committee members	No		Contact	No	Privacy Notice	No contract	Names become Public Knowledge, other data is confidential		Annually			
<b>Planning</b>													
	Objections	No	Democracy	We are consulted on applicatio	Yes	Public document	No contract	Our objection or approval is a public document	Clerk	On receipt	1 year	Clerk	None required
<b>Allotments</b>													
	Tenancy Agreements	No	Property Record	Service to community	No	Tenancy Agreement	Yes		Clerk	Annually	See document Retention Policy	Clerk	Password/ Lock & key
	Tenant Contact Details	No	Property Record	Tenant/landlord contact	No	Tenancy Agreement	Yes						
<b>Property / Land</b>													
	Hearse House Tenancy Agreement	No	Property Record	Tenant/landlord contact	No	Tenancy Agreement	Yes		Clerk	Annually	See document Retention Policy	Clerk	Password/ Lock & key
<b>Cemetery</b>													
	Record of Burials	No	legal	Legal requirement	Yes	Not applicable	Not applicable	Public document required by law	Clerk	On raising	Indefinitely	Clerk	Password/ Lock & key
	Purchased graves	Sometimes	legal	Contract	No	Contract	Yes	Any reasonable request					
	Contact details of known undertakers	No	Cemetery functio	Contact	No	Privacy Notice	Not applicable	Bereaved families					
<b>General Contacts</b>													
	Email Addresses	Yes	Democracy	Contact	Yes	Privacy Notice	Not applicable	Any reasonable request	Clerk	On raising	See document Retention Policy	Clerk	Password/ Lock & key

## Councillor Privacy Notice

### COTHERSTONE PARISH COUNCIL

#### Councillor Privacy Notice

##### *On signing an Acceptance of Office and taking your seat on Cotherstone Parish Council*

The information you provide (personal information such as name, address, email address, phone number, register of interests and other relevant information) will be processed and stored so that it is possible to contact you, respond to your correspondence and retain information relating to your time in office with the Council. (The Council ask that you provide a dedicated email address for conducting Council business). Your personal information will not be shared with any third party other than those related to a statutory or lawful requirement or with your consent.

#### **When you contact us**

The information you provide (personal information such as name, address, email address, phone number, organisation) will be processed and stored to enable us to contact you and respond to your correspondence, provide information and/or access our facilities and services. Your personal information will be not shared or provided to any other third party.

#### **The Council's Right to Process Information**

Under General Data Protection Regulations 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; or
- Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller

#### **Information Security**

Cotherstone Parish Council has a duty to ensure the security of personal data. We make sure that your information is protected from unauthorised access, loss, manipulation, falsification, destruction or unauthorised disclosure. This is done through appropriate technical measures and appropriate policies. Copies of these policies can be requested.

We will keep your data only for the purpose it was collected for and only for as long as is necessary, after which it will be deleted. (You may request the deletion of your data held by Cotherstone Parish Council at any time).

#### **Access to Information**

You have the right to request access to the information we have on you. You can do this by contacting our Parish Clerk by email: [cotherstoneparishcouncil@hotmail.com](mailto:cotherstoneparishcouncil@hotmail.com) or by post: Moor Edge, Snaisgill, Middleton-in-Teesdale, Co. Durham DL12 0RP.

#### **Information Correction**

If you believe that the information we have about you is incorrect, you may contact us so that we can update it and keep your data accurate. Please contact the Parish Clerk by email: [cotherstoneparishcouncil@hotmail.com](mailto:cotherstoneparishcouncil@hotmail.com) or by post: Moor Edge, Snaisgill, Middleton-in-Teesdale, Co. Durham DL12 0RP to request this.

#### **Information Deletion**

If you wish Cotherstone Parish Council to delete the information it has about you please contact the Parish Clerk by email: [cotherstoneparishcouncil@hotmail.com](mailto:cotherstoneparishcouncil@hotmail.com) or by post: Moor Edge, Snaisgill, Middleton-in-Teesdale, Co. Durham DL12 0RP to request this.

#### **Right to Object**

If you believe that your data is not being processed for the purpose it has been collected for, you may object: Please contact the Parish Clerk by email: [cotherstoneparishcouncil@hotmail.com](mailto:cotherstoneparishcouncil@hotmail.com) or by post: Moor Edge, Snaisgill, Middleton-in-Teesdale, Co. Durham DL12 0RP to object.

### **Rights Related to Automated Decision Making and Profiling**

Cotherstone Parish Council does not use any form of automated decision making or the profiling of individual personal data.

### **Complaints**

If you have a complaint regarding the way your personal data has been processed, you may make a complaint to Cotherstone Parish Council's Clerk: (by email: [cotherstoneparishcouncil@hotmail.com](mailto:cotherstoneparishcouncil@hotmail.com) or by post: Moor Edge, Snaisgill, Middleton-in-Teesdale, Co. Durham DL12 0RP) and the Information Commissioners Office [casework@ico.org.uk](mailto:casework@ico.org.uk) Tel: 0303 123 1113

**Summary:** In accordance with the law, Cotherstone Parish Council only collects a limited amount of information about you that is necessary for correspondence, information and service provision. Cotherstone Parish Council does not use profiling, and does not sell or pass your data to third parties. Cotherstone Parish Council does not use your data for purposes other than those specified. Cotherstone Parish Council makes sure your data is stored securely. Cotherstone Parish Council deletes all information deemed to be no longer necessary. Cotherstone Parish Council constantly reviews its Privacy Policies to keep them up to date in protecting your data (you can request a copy of the policies at any time).

## Data breach reporting form

### Data Security Breach Reporting Form

A data security breach can happen for a number of reasons: loss or theft of data or equipment on which data is stored, inappropriate access controls allowing unauthorised use, equipment failure, human error, unforeseen circumstances such as a fire or flood, hacking attack and 'blagging' offences where information is obtained by deceiving the organisation who holds it.

Examples:

- Reportable theft or loss of an unencrypted laptop computer or other unencrypted portable electronic/digital media holding names, addresses, dates of birth and National Insurance Numbers of individuals.
- Unsecured access to a manual paper-based filing system (or unencrypted digital media) holding the personal data relating to named individuals and their financial records etc.

#### Breach containment and recovery

##### Article 2(2) of the Notification Regulation states:

The provider shall notify the personal data breach to the competent national authority no later than 24 hours after the detection of the personal data breach, where feasible. The provider shall include in its notification to the competent national authority the information set out below. The Privacy and Electronic Communications (EC Directive) Regulations 2003 (PECR) provide rules about sending marketing and advertising by electronic means, such as by telephone, fax, email, text and picture or video message, or by using an automated calling system. PECR also include other rules relating to cookies, telephone directories, traffic data, location data and security breaches. Detection of a personal data breach shall be deemed to have taken place when the provider has acquired sufficient awareness that a security incident has occurred that led to personal data being compromised, in order to make a meaningful notification as required under this Regulation.

Date and time of Notification of Breach	
Notification of breach to whom Name Contact details	
Details of breach	
Nature and content of data involved	
Number of individuals affected:	
Name of person investigating breach Name Job title Contact details Email Phone number Address	
Information Commissioner informed Time and method of contact	

<a href="https://report.ico.org.uk/security-breach/">https://report.ico.org.uk/security-breach/</a>	
<p>Police informed if relevant</p> <p>Time and method of contact</p> <p>Name of person contacted</p> <p>Contact details</p>	
<p><b>Individuals contacted</b></p> <p>Number of individuals contacted</p> <p>Method of contact</p> <p>Does the breach affect individuals in other EU member states?</p> <p>What are the potential consequences and adverse effects on those individuals?</p> <p>Confirm that details of the nature of the risk to the individuals affected, any measures they can take to safeguard against it, and the likely cost to them of taking those measures has been communicated to the individuals involved.</p>	
<p>Councillors and any staff briefed</p>	
<p>Assessment of ongoing risk</p>	
<p>Containment actions: technical and organisational security measures applied (or which are to be applied) to the affected personal data</p>	
<p>Recovery plan</p>	
<p>Evaluation and response</p>	

## Email contact Privacy Notice

# COTHERSTONE PARISH COUNCIL

## Email Contact Privacy Notice

### When you contact us

The information you provide (personal information such as name, address, email address, phone number, organisation) will be processed and stored to enable us to contact you and respond to your correspondence, provide information and/or access our facilities and services. Your personal information will be not shared or provided to any other third party.

### The Councils' right to process information

General Data Protection Regulations Article 6 (1) (a) (b) and (e) provide the Council with a right to process personal information provided that:

- Processing is with consent of the data subject or
- Processing is necessary for compliance with a legal obligation or
- Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.

### Information security

Cotherstone Parish Council has a duty to ensure the security of personal data. We make sure that your information is protected from unauthorised access, loss, manipulation, falsification, destruction or unauthorised disclosure. This is done through appropriate technical measures and appropriate policies. Copies of these policies can be requested.

We will only keep your data for the purpose it was collected for and only for as long as is necessary, after which it will be deleted. You may request the deletion of your data held by Cotherstone Parish Council at any time.

### Children

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

### Access to information

You have the right to request access to the information we have on you. You can do this by contacting the Parish Clerk (cotherstoneparishcouncil@hotmail.com or telephone 01833 640893 or by post to Moor Edge, Snaisgill, Middleton-in-Teesdale, DL12 0RP).

### Information correction

If you believe that the information we have about you is incorrect, you may contact us so that we can update it and keep your data accurate. Please contact the Parish Clerk (cotherstoneparishcouncil@hotmail.com or telephone 01833 640893 or by post to Moor Edge, Snaisgill, Middleton-in-Teesdale, DL12 0RP) to request this.

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### Rights related to automated decision making and profiling

Cotherstone Parish Council does not use any form of automated decision making or profiling of individual personal data.

### Conclusion

In accordance with the law, we collect only a limited amount of information about you that is necessary for correspondence, information and service provision. We do not use profiling, we do not sell or pass your data to third parties. We do not use your data for purposes other than those specified. We make sure your data is stored securely. We delete all information deemed to be no longer necessary. We constantly review our Privacy Policy to keep it up to date in protecting your data. (You can request a copy of any of our policies at any time.)

### Complaints

If you have a complaint regarding the way your personal data has been processed you may make a complaint to Cotherstone Parish Council's Data Protection Officer: [\(Officers Name and contact details\)](#) and the Information Commissioners Office [casework@ico.org.uk](mailto:casework@ico.org.uk) Tel: 0303 123 1113.

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## Subject Access Request form

### COTHERSTONE PARISH COUNCIL Subject Access Request Form

Process to Action	
Name of requester (Method of communication) Email Address Phone number Postal Address	
Date Subject Access Request made	
Is the request made under the Data Protection Legislation	Yes      No
Date Subject Access Request action to be completed by (One month after receipt date is the limit)	
Extension to the date of reply requested (An extension of another two months is permissible provided it is communicated to the subject within the one-month period)	Yes      No
Extension date advised to the Subject Requester and method of contact	
Identification proven from which of the following: <ul style="list-style-type: none"> <li>○ Current UK/EEA Passport</li> <li>○ UK Photo card Driving Licence (Full or Provisional)</li> <li>○ EEA National Identity Card</li> <li>○ Full UK Paper Driving Licence</li> <li>○ State Benefits Entitlement Document</li> <li>○ State Pension Entitlement Document</li> <li>○ HMRC Tax Credit Document</li> <li>○ Local Authority Benefit Document</li> <li>○ State/Local Authority Educational Grant Document</li> <li>○ HMRC Tax Notification Document</li> <li>○ Disabled Driver's Pass</li> <li>○ Financial Statement issued by bank, building society or credit card company</li> <li>○ Utility bill for supply of gas, electric, water or telephone landline</li> <li>○ A recent Mortgage Statement</li> <li>○ A recent council Tax Bill/Demand or Statement</li> <li>○ Tenancy Agreement</li> <li>○ Building Society Passbook which shows a transaction in the last 3 months and their address</li> </ul>	

Verification sought that the Subject Access request is substantiated	Yes	No
Verification received	Yes	No
Verification if the Council cannot provide the information requested	Yes	No
Is the request excessive or unfounded?	Yes	No
Request to be actioned	Yes	No
Fee to be charged (Subject Access requests must be undertaken free of charge to a requester unless the legislation permits a reasonable charge)	Yes	No
If the request is to be refused, action to be taken and by whom		
Changes requested to data/ or removal		
<b>Complaint Process</b> (Where a requestor is not satisfied with a response to a Subject Access Request, the council must manage this as a complaint)		
Completion date of request		
Date complaint received by requester and details of the complaint		
Date complaint completed and outcome		

#### Categories of data to check

Data	Paper files	Laptop	Checked	Corrected/Deleted	Actioned by
HR					
Democracy					
Statutory function					
Legal					
Business					
Legal requirement					
General data					
Consultation data					

## General Consent Form

### COTHERSTONE PARISH COUNCIL

#### General Data Protection Regulations

#### Consent to hold contact information

I agree that I have read and understand Cotherstone Parish Council's Privacy Notice.

I agree by signing below that the Council may process my personal information for providing information and corresponding with me.

I agree that Cotherstone Parish Council can keep my contact information data for an undisclosed time or until I request its removal.

I have the right to request modification on the information that you keep on record.

I have the right to withdraw my consent and request that my details are removed from your database.

Name	
Address	
Telephone No(s).	
Email Address	
Signature	
Date	

#### For office use only:

Date Data received	Date consent received and approved for data to be held	Data received as Phone, email, hard copy or other	Data approved to be shared with the below	Removal of consent received	Date data disposed of and method of disposal actioned

## Purchase of Exclusive Rights of Burial Consent Form

### COTHERSTONE PARISH COUNCIL

Clerk: Judith Mashiter, Moor Edge, Snaisgill, Middleton-in-Teesdale, County Durham DL12 0RP  
Tel. 01833 640893 Email: cotherstoneparishcouncil@hotmail.com

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### Purchase of Exclusive Rights Consent

When you purchase the Exclusive Right to a single or joint cemetery plot, the information you provide (personal information such as name, address, email address, phone number) will be processed and stored so that it is possible to contact you and to respond to your correspondence, provide information and send invoices and receipts relating to your burial plot/s. Your personal information will not be shared with any third party without your prior consent.

- I agree that I have read and understand Cotherstone Parish Council's Privacy Notice. I agree by signing below that the Parish Council may process my personal information for providing information and corresponding with me.
- I agree that Cotherstone Parish Council can keep my contact information data for an undisclosed time or until I request its removal.

I have the right to request modification to the information that you keep on record.

I have the right to withdraw my consent and request that my details are removed from your database.

Name	
Address	
Postcode	
Telephone Number	
Email Address	
Facebook	
Twitter	
Signature	
Date	

## Allotment tenant Consent Form

### COTHERSTONE PARISH COUNCIL

#### General Data Protection Regulations Allotment Tenant's Consent Form

*To be signed and returned with your Allotment Tenancy Agreement*

##### Consent to hold Contact Information

I agree that I have read and understand Cotherstone Parish Council's Privacy Notice.

I agree by signing below that the Council may process my personal information for providing information and corresponding with me.

I agree that Cotherstone Parish Council can keep my contact information data for an undisclosed time or until I request its removal.

I have the right to request modification on the information that you keep on record.

I have the right to withdraw my consent and request that my details are removed from your database.

Name	
Address	
Telephone No(s).	
Email Address	
Signature	
Date	

##### For office use only:

Date Data received	Date consent received and approved for data to be held	Data received as Phone, email, hard copy or other	Data approved to be shared with the below	Removal of consent received	Date data disposed of and method of disposal actioned

**COTHERSTONE PARISH COUNCIL**  
**Document Retention and Disposal Policy**

**1. Introduction**

- 1.1 The Council accumulates certain information and data during the course of its everyday activities. This includes data generated internally in addition to information obtained from individuals and external organisations. This information is recorded in various different types of document.
- 1.2 Records created and maintained by the Council are an important asset and as such measures need to be undertaken to safeguard this information. Properly managed records provide authentic and reliable evidence of the Council's transactions and are necessary to ensure it can demonstrate accountability.
- 1.3 Documents may be retained in either 'hard' paper form or in electronic forms. For the purpose of this policy, 'document' and 'record' refers to both hard copy and electronic records.
- 1.4 It is imperative that documents are retained for an adequate period of time. If documents are destroyed prematurely the Council and individual officers concerned could face prosecution for not complying with legislation and it could cause operational difficulties, reputational damage and difficulty in defending any claim brought against the Council.
- 1.5 In contrast to the above the Council should not retain documents longer than is necessary. Timely disposal should be undertaken to ensure compliance with the General Data Protection Regulations so that personal information is not retained longer than necessary. This will also ensure the most efficient use of limited storage space.

**2. Scope and Objectives of the Policy**

- 2.1 The aim of this document is to provide a working framework to determine which documents are:
  - Retained – and for how long; or
  - Disposed of – and if so by what method.
- 2.2 There are some records that do not need to be kept at all or that are routinely destroyed in the course of business. This usually applies to information that is duplicated, unimportant or only of a short-term value. Unimportant records of information include:
  - 'With compliments' slip
  - Catalogues and trade journals
  - Non-acceptance of invitations
  - Trivial electronic mail messages that are not related to Council business
  - Requests for information such as maps, plans or advertising material
  - Out of date distribution lists.
- 2.3 Duplicated and superseded material such as stationery, manuals, drafts, forms, address books and reference copies of annual reports may be destroyed.

- 2.4 Records should not be destroyed if the information can be used as evidence to prove that something has happened. If destroyed, the document needs to be disposed of under the General Data Protection Regulations.

### **3. Roles and Responsibilities for Document Retention and Disposal**

- 3.1 Councils are responsible for determining whether to retain or dispose of documents and should undertake a review of documentation at least on an annual basis to ensure that any unnecessary documentation being held is disposed of under the General Data Protection Regulations.
- 3.2 Councils should ensure that all employees are aware of the retention/disposal schedule.

### **4. Document Retention Protocol**

- 4.1 Councils should have in place an adequate system for documenting the activities of their services. This system should take into account the legislative and regulatory environments to which they work.
- 4.2 Records of each activity should be complete and accurate enough to allow employees and their successors to undertake appropriate actions in the context of their responsibilities to:
- Facilitate an audit or examination of the business by anyone so authorised.
  - Protect the legal and other rights of the Council, its clients and any other persons affected by its actions.
  - Verify individual consent to record, manage and record disposal of their personal data.
  - Provide authenticity of the records so that the evidence derived from them is shown to be credible and authoritative.
- 4.3 To facilitate this the following principles should be adopted:
- Records created and maintained should be arranged in a record-keeping system that will enable quick and easy retrieval of information under the General Data Protection Regulations
  - Documents that are no longer required for operational purposes but need retaining should be placed at the County Records Office.
- 4.4 Appendix A: List of Documents for Retention or Disposal is based on guidance on the recommended minimum retention periods for specific classes of documents and records and has been compiled from recommended best practice from the Public Records Office, the Records Management Society of Great Britain and in accordance with relevant legislation.
- 4.5 Whenever there is a possibility of litigation, the records and information that are likely to be affected should not be amended or disposed of until the threat of litigation has been removed.

### **5. Document Disposal Protocol**

- 5.1 Documents should only be disposed of if reviewed in accordance with the following:
- Is retention required to fulfil statutory or other regulatory requirements?
  - Is retention required to meet the operational needs of the service?

- Is retention required to evidence events in the case of dispute?
  - Is retention required because the document or record is of historic interest or intrinsic value?
- 5.2 When documents are scheduled for disposal the method of disposal should be appropriate to the nature and sensitivity of the documents concerned. A record of the disposal will be kept in compliance with the General Data Protection Regulations.
- 5.3 Documents can be disposed of by any of the following methods:
- Non-confidential records: place in waste paper bin for recycling.
  - Confidential records or records giving personal information: shred/burn documents.
  - Deletion of computer records.
  - Transmission of records to an external body such as the County Records Office.
- 5.4 The following principles should be followed when disposing of records:
- All records containing personal or confidential information should be destroyed at the end of the retention period. Failure to do so could lead to the Council being prosecuted under the General Data Protection Regulations, the Freedom of Information Act or cause reputational damage.
  - Where computer records are deleted steps should be taken to ensure that data is 'virtually impossible to retrieve' as advised by the Information Commissioner.
  - Where documents are of historical interest it may be appropriate that they are transmitted to the County Records Office.
  - Back-up copies of documents should also be destroyed (including electronic or photographed documents unless specific provisions exist for their disposal).
- 5.5 Records should be maintained of appropriate disposals. These records should contain the following information:
- The name of the document destroyed.
  - The date the document was destroyed.
  - The method of disposal.

## **6. Data Protection Act 1998 – Obligation to Dispose of Certain Data**

- 6.1 Personal information is defined as: data that relates to a living individual who can be identified:
- a) from the data, or
  - b) from those data and other information which is in the possession of or is likely to come into the possession of the data controller.
- It includes any expression of opinion about the individual and any indication of the intentions of the Council or other person in respect of the individual.
- 6.2 Councils are responsible for ensuring that they comply with the principles of the General Data Protection Regulations namely:
- Personal data is processed fairly and lawfully and, in particular, shall not be processed unless specific conditions are met.
  - Personal data shall only be obtained for specific purposes and processed in a compatible manner.
  - Personal data shall be adequate, relevant, but not excessive.

- Personal data shall be accurate and up to date.
- Personal data shall not be kept for longer than is necessary.
- Personal data shall be processed in accordance with the rights of the data subject.
- Personal data shall be kept secure.

6.3 External storage providers or archivists that are holding Council documents must also comply with the above principles of the General Data Protection Regulations.

## **7. Scanning of Documents**

7.1 In general, once a document has been scanned on to a document image system the original becomes redundant. There is no specific legislation covering the format for which local government records are retained following electronic storage, except for those prescribed by HM Revenue and Customs.

7.2 As a general rule hard copies of scanned documents should be retained for three months after scanning.

7.3 Original documents required for VAT and tax purposes should be retained for six years unless a shorter period has been agreed with HM Revenue and Customs.

## **8. Review of Document Retention**

8.1 It is planned to review, update and where appropriate amend this document on a regular basis (at least every three years in accordance with the *Code of Practice on the Management of Records* issued by the Lord Chancellor).

8.2 This document has been compiled from various sources of recommended best practice and with reference to the following documents and publications:

- *Local Council Administration*, Charles Arnold-Baker, 10th edition, Chapter 11
- Local Government Act 1972, sections 225 – 229, section 234
- SLCC Advice Note 316 Retaining Important Documents
- SLCC Clerks' Manual: Storing Books and Documents
- *Lord Chancellor's Code of Practice on the Management of Records* issued under Section 46 of the *Freedom of Information Act 2000*

## **9. List of Documents**

9.1 The full list of the Council's documents and the procedures for retention or disposal can be found in Appendix A: List of Documents for Retention and Disposal. This is updated regularly in accordance with any changes to legal requirements.

9.2 To ensure records are easily accessible:

- A list of files stored in cabinets will be kept
- Electronic files will be saved using relevant file names. The electronic files will be backed up periodically on a portable hard drive and also in a cloud-based server. Documentation no longer required will be disposed of, ensuring any confidential documents are destroyed as confidential waste.

9.3 A list will be kept of those documents disposed of to meet the requirements of the GDPR regulations.

Document	Minimum Retention Period	Reason for retention	Location Retained	Disposal
<b>Administration</b>				
Minutes	Indefinite	Archive	Clerk, DL12 ORP / Durham County Records Office	Original signed paper copies of Council minutes of meetings must be kept indefinitely in safe storage. At regular intervals of not more than 5 years they must be archived and deposited with the Higher Authority
Agendas	5 years	Management	Clerk, DL12 ORP	Bin (shred/burn any confidential waste)
Accident/incident reports	20 years	Potential claims	Clerk, DL12 ORP	Confidential waste. A list will be kept of those documents disposed of to meet the requirements of the GDPR regulations.
Scales of fees and charges	6 years	Management	Clerk, DL12 ORP	Bin
Receipt and payment accounts	Indefinite	Archive	Clerk, DL12 ORP	N/A
Receipt books of all kinds	6 years	VAT	Clerk, DL12 ORP	Bin
Bank statements including deposit/savings accounts	Last completed audit year	Audit	Clerk, DL12 ORP	Shred/burn
Bank paying-in books	Last completed audit year	Audit	Clerk, DL12 ORP	Shred/burn
Cheque book stubs	Last completed audit year	Audit	Clerk, DL12 ORP	Shred/burn
Quotations and tenders	6 years	Limitation Act 1980 (as amended)	Clerk, DL12 ORP	Confidential waste. A list will be kept of those documents disposed of to meet the requirements of the GDPR regulations.
Paid invoices	6 years	VAT	Clerk, DL12 ORP	Shred/burn
Paid cheques	6 years	Limitation Act 1980 (as amended)	Clerk, DL12 ORP	Shred/burn
VAT records	6 years generally but 20 years for VAT on rents	VAT	Clerk, DL12 ORP	Shred/burn
Petty cash, postage and telephone books	6 years	Tax, VAT, Limitation Act 1980 (as amended)	Clerk, DL12 ORP	Shred/burn
Timesheets	Last completed audit year 3 years	Audit (requirement) Personal injury (best practice)	Clerk, DL12 ORP	Bin
Wages books/payroll	12 years	Superannuation	Clerk, DL12 ORP	Shred/burn
Insurance policies	While valid (but see next two items below)	Management	Clerk, DL12 ORP	Bin
Insurance company names and policy numbers	Indefinite	Management	Clerk, DL12 ORP	N/A
Certificates for insurance against liability for employees	40 years from date on which insurance commenced or was renewed	The Employers' Liability (Compulsory Insurance) Regulations 1998 (SI 2753) Management	Clerk, DL12 ORP	Bin
Investments	Indefinite	Audit, Management		N/A
Members' allowances register	6 years	Tax, Limitation Act 1980 (as amended)	Clerk, DL12 ORP	Confidential waste. A list will be kept of those documents disposed of to meet the requirements of the GDPR regulations.
Information from other bodies, e.g. circulars from county associations, NALC, principal authorities	Retained for as long as it is useful and relevant		Clerk, DL12 ORP	Bin
Local/historical information	Indefinite – to be securely kept for benefit of the Parish	Councils may acquire records of local interest and accept gifts or records of general and local interest in order to promote the use for such records (defined as materials in written or other form setting out facts or events or otherwise recording information).	Clerk, DL12 ORP	N/A
Magazines and journals	Council may wish to keep its own publications. For others retain for as long as they are useful and relevant.	The Legal Deposit Libraries Act 2003 (the 2003 Act) requires a local council which after 1st February 2004 has published works in print (this includes a pamphlet, magazine or newspaper, a map, plan, chart or table) to deliver, at its own expense, a copy of them to the British Library Board (which manages and controls the British Library). Printed works as defined by the 2003 Act published by a local council therefore constitute materials which the British Library holds.	Clerk, DL12 ORP	Bin if applicable

General correspondence	Unless it relates to specific categories outlined in the policy, correspondence, both paper and electronic, should be kept. Records should be kept for as long as they are needed for reference or accountability purposes, to comply with regulatory requirements or to protect legal and other rights and interests.	Management	Clerk, DL12 ORP	Bin (shred/burn any confidential waste). A list will be kept of those documents disposed of to meet the requirements of the GDPR regulations.
Correspondence relating to staff	If related to Audit, see relevant sections above. Should be kept securely and personal data in relation to staff should not be kept for longer than is necessary for the purpose it was held. Likely time limits for tribunal claims between 3–6 months. Recommend this period be for 3 years.	After an employment relationship has ended, a council may need to retain and access staff records for former staff for the purpose of giving references, payment of tax, national insurance contributions and pensions, and in respect of any related legal claims made against the council.	Clerk, DL12 ORP	Confidential waste. A list will be kept of those documents disposed of to meet the requirements of the GDPR regulations.
<b>Documents from legal matters, negligence and other torts</b>				
Most legal proceedings are governed by the Limitation Act 1980 (as amended). The 1980 Act provides that legal claims may not be commenced after a specified period. Where the limitation periods are longer than other periods specified the documentation should be				
Negligence	6 years		Clerk, DL12 ORP	Shred/burn. A list will be kept of those documents disposed of to meet the requirements of the GDPR regulations.
Defamation	1 year		Clerk, DL12 ORP	Shred/burn. A list will be kept of those documents disposed of to meet the requirements of the GDPR regulations.
Contract	6 years		Clerk, DL12 ORP	Shred/burn. A list will be kept of those documents disposed of to meet the requirements of the GDPR regulations.
Leases	12 years		Clerk, DL12 ORP	Shred/burn
Sums recoverable by statute	6 years		Clerk, DL12 ORP	Shred/burn
Personal injury	3 years		Clerk, DL12 ORP	Shred/burn
To recover land	12 years		Clerk, DL12 ORP	Shred/burn
Rent	6 years		Clerk, DL12 ORP	Shred/burn
Breach of trust	None		Clerk, DL12 ORP	Shred/burn
Trust deeds	Indefinite		Clerk, DL12 ORP	N/A
<b>Allotments</b>				
Register and plans	Indefinite	Audit, Management	Clerk, DL12 ORP	N/A
Minutes	Indefinite	Audit, Management	Clerk, DL12 ORP	N/A
Legal papers	Indefinite	Audit, Management	Clerk, DL12 ORP	N/A
<b>Burial Grounds</b>				
Register of fees collected	Indefinite	Archives, Local Authorities Cemeteries Order 1977 (SI 204)	Cllr Richard Hunter	N/A
Register of burials				
Register of purchased graves				
Register/plan of grave spaces				
Register of memorials				
Applications for interment				
Applications for right to erect memorials				
Disposal certificates				
Copy certificates of grant of exclusive right of burial				
<b>Planning papers</b>				
Applications	1 year	Management	Cllr Richard Hunter	Bin
Appeals	1 year unless significant development	Management	Cllr Richard Hunter	Bin
Trees	1 year	Management	Cllr Richard Hunter	Bin
Local Development Plans	Retained as long as in force	Reference	Cllr Richard Hunter	Bin
Local Plans	Retained as long as in force	Reference	Cllr Richard Hunter	Bin
Town/Neighbourhood Plans	Indefinite – final adopted plans	Historical purposes	Cllr Richard Hunter	N/A

## Draft Information & Data Protection Policy

# Information & Data Protection Policy

### Introduction

In order to conduct its business, services and duties, Cotherstone 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 developed.
- Confidential information about other organisations because of commercial sensitivity.
- Personal data concerning its current, past and potential employees, Councillors, and volunteers.
- Personal data concerning individuals who contact it for information, to access its services or facilities or to make a complaint.

Cotherstone Parish Council will adopt procedures and manage responsibly, all data which it handles and will respect the confidentiality of both its own data and that belonging to partner organisations it works with 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 Commissioners Office.

The Council will be as transparent as possible about its operations and will work closely with public, 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 local community. Details of information which is routinely available is contained in the Council's Publication Scheme which is based on the statutory model publication scheme for local councils.

### Protecting confidential or sensitive information

Cotherstone Parish 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 becomes law on 25<sup>th</sup> May 2018, like the the Data Protection Act 1998 before it, 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.

### This 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.

### **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 Parish 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) (eg. a Parish Council or employer) 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.

Cotherstone Parish 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
- 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 we 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 in order to pursue the legitimate interests of the data controller or third parties.

Particular attention is paid to the processing of any **sensitive personal information** and the Parish 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 in order to protect the vital interests of the individual or another person.

#### **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.

- Email: cotherstoneparishcouncil@hotmail.com
- Phone: 01833 640893
- Correspondence: The Clerk, Cotherstone Parish Council, Moor Edge, Snaisgill, Middleton-in-Teesdale, Co. Durham DL12 ORP

#### **Diversity Monitoring**

Cotherstone Parish Council may choose to monitor the diversity of its employees, and Councillors, in order to ensure that there is no inappropriate or unlawful discrimination in the way it conducts its activities. It may undertake similar data handling in respect of prospective employees. This data will always be treated as confidential. It will be accessed only by authorised individuals within the Council and will not be disclosed to any other bodies or individuals. Diversity information will never be used as selection criteria and will not be made available to others involved in the recruitment process. Anonymised data derived from diversity monitoring will be used for monitoring purposes and may be published and passed to other bodies.

The Council will always give guidance on personnel data to employees, councillors, partners and volunteers through a Privacy Notice and ensure that individuals on whom personal information is kept are aware of their rights and have easy access to that information on request.

Appropriate technical and organisational measures will be taken against Unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data.

Personal data shall not be transferred to a country or territory outside the European Economic Areas unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.

#### **Information 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 (Your Council Name), 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 Town Council is able to 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.

#### **The Councils Right to Process Information**

General Data Protection Regulations (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 Council.

#### **Information Security**

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

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

#### **Children**

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

#### **Rights of a Data Subject**

**Access to Information:** an individual has the right to request access to the information we have on them. They can do this by contacting our Parish Clerk.

**Information Correction:** If they believe that the information we have about them is incorrect, they may contact us so that we can update it and keep their data accurate. Please contact: Parish Clerk.

**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 Commissioners Office [casework@ico.org.uk](mailto:casework@ico.org.uk) Tel: 0303 123 1113.

The Council will always give guidance on personnel data to employees through the Employee handbook.

The Council will ensure that individuals on whom personal information is kept are aware of their rights and have easy access to that information on request.

### **Making Information Available**

The Publication Scheme is a means by which the Council can make a significant amount of information available routinely, without waiting for someone to specifically request it. The scheme is intended to encourage local people to take an interest in the work of the Council and its role within the community.

In accordance with the provisions of the Freedom of Information Act 2000, this Scheme specifies the classes of information which the Council publishes or intends to publish. It is supplemented with an Information Guide which will give greater detail of what the Council will make available and hopefully make it easier for people to access it.

All formal meetings of Council and its committees are subject to statutory notice being given on notice boards, the Website and sent to the local media. The Council publishes an annual programme in May each year. All formal meetings are open to the public and press and reports to those meetings and relevant background papers are available for the public to see. The Council welcomes public participation and has a public participation session on each Council and committee meeting. Details can be seen in the Council's Standing Orders, which are available on its Website or at its Offices.

Occasionally, Council or committees may need to consider matters in private. Examples of this are matters involving personal details of staff, or a particular member of the public, or where details of commercial/contractual sensitivity are to be discussed. This will only happen after a formal resolution has been passed to exclude the press and public and reasons for the decision are stated. Minutes from all formal meetings, including the confidential parts are public documents.

The Openness of Local Government Bodies Regulations 2014 requires written records to be made of certain decisions taken by officers under delegated powers. These are not routine operational and administrative decisions such as giving instructions to the workforce or paying an invoice approved by Council, but would include urgent action taken after consultation with the Chairman, such as responding to a planning application in advance of Council. In other words, decisions which would have been made by Council or committee had the delegation not been in place.

The 2014 Regulations also amend the Public Bodies (Admission to Meetings) Act 1960 to allow the public or press to film, photograph or make an audio recording of council and committee meetings normally open to the public. The Council will where possible facilitate such recording unless it is being disruptive. It will also take steps to ensure that children, the vulnerable and members of the public who object to being filmed are protected without undermining the broader purpose of the meeting.

The Council will be pleased to make special arrangements on request for persons who do not have English as their first language or those with hearing or sight difficulties.

### **Disclosure Information**

The Council will as necessary undertake checks on both staff and Members with the the Disclosure and Barring Service and will comply with their Code of Conduct relating to the secure storage, handling, use, retention and disposal of Disclosures and Disclosure Information. It will include an appropriate operating procedure in its integrated quality management system.

### **Data Transparency**

The Council has resolved to 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 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 higher standards and responding to best practice as it develops.

The principles of the Code are:

**Demand led:** new technologies and publication of data should support transparency and accountability

**Open:** the provision of public data will be integral to the Council's engagement with residents so that it drives accountability to them.

**Timely:** data will be published as soon as possible following production.

Government has also issued a further Code of Recommended Practice on Transparency, compliance of which is compulsory for parish councils with turnover (gross income or gross expenditure) not exceeding £25,000 per annum. These councils will be exempt from the requirement to have an external audit from April 2017. The following information is published on the Parish Council website for ease of access:

- All transactions above £100.
- End of year accounts
- Annual Governance Statements
- Internal Audit Reports
- List of Councillor or Member responsibilities
- Details of public land and building assets
- Draft minutes of Council and committees within one month
- Agendas and associated papers no later than three clear days before the meeting.

## **COTHERSTONE PARISH COUNCIL**

### **Social Media and Electronic Communication Policy**

The use of digital and social media and electronic communication enables the Parish Council to interact in a way that improves the communications both within the Council and between the Council and the people, businesses and agencies it works with and serves.

The Council has a website ([www.cotherstoneparishcouncil.org.uk](http://www.cotherstoneparishcouncil.org.uk)) and uses email to communicate. Currently the Parish Council does not Facebook, Twitter or any other social media channel. The Council will always try to use the most effective channel for its communications. Over time the Council may add to the channels of communication that it uses as it seeks to improve and expand the services it delivers. When these changes occur, this Policy will be updated to reflect the new arrangements.

**Communications from the Council will meet the following criteria:**

- Be civil, tasteful and relevant;
- Not contain content that is knowingly unlawful, libellous, harassing, defamatory, abusive, threatening, harmful, obscene, profane, sexually oriented or racially offensive;
- Not contain content knowingly copied from elsewhere, for which we do not own the copyright;
- Not contain any personal information;
- If it is official Council business, it will be moderated by either the Chair/Vice Chair of the Council or the Clerk to the Council;
- Social media will not be used for the dissemination of any political advertising.

**Parish Council Website**

Where necessary, the Council may direct those contacting us to our website to see the required information, or we may forward their question to one of our councillors for consideration and response. We may not respond to every comment we receive, particularly if we are experiencing a heavy workload.

The Council may, at its discretion, allow and enable approved local groups to have and maintain a presence on its website for the purpose of presenting information about the group's activities. The local group would be responsible for maintaining the content and ensuring that it meets the Council's 'rules and expectation' for the website. The Council reserves the right to remove any or all of a local group's information from the website if it feels that the content does not meet the Council's 'rules and expectation' for its website. Where content on the website is maintained by a local group it should be clearly marked that such content is not the direct responsibility of the Council.

**Parish Council email**

The Clerk to the council has their own council email address ([cotherstoneparishcouncil@hotmail.com](mailto:cotherstoneparishcouncil@hotmail.com)).

The email account is monitored mainly during office hours, Monday to Friday, and we aim to reply to all questions sent as soon as we can. An 'out of office' message will be used when appropriate.

The Clerk is responsible for dealing with email received and passing on any relevant mail to councillors or external agencies for information and/or action. All communications on behalf of the Council will usually come from the Clerk, and/or otherwise will always be copied to the Clerk. All new emails requiring data to be passed on, will be followed up with a Data Consent Form for completion before action is taken with that correspondence.

Individual councillors are at liberty to communicate directly with parishioners in relation to their own personal views, if appropriate, copied to the Clerk. Note that any emails copied to the Clerk become official and will be subject to The Freedom of Information Act.

These procedures will ensure that a complete and proper record of all correspondence is kept.

Do not forward personal information on to other people or groups outside of the Council —including names, addresses, email addresses, IP addresses and cookie identifiers — even of fellow councillors.

**SMS (texting)**

Councillors and the Clerk may use SMS as a convenient way to communicate at times. All are reminded that this Policy also applies to such messages.

**Video Conferencing eg. Skype or Facetime**

If this medium is used to communicate please note that this Policy also applies to the use of video conferencing.

**Internal communication and access to information within the Council**

The Council is continually looking at ways to improve its working and the use of social media and electronic communications is a major factor in delivering improvement.

**Councillors are expected to abide by the Code of Conduct and the General Data Protection Regulation in all their work on behalf of the Council**

As more and more information becomes available at the press of a button, it is vital that all information is treated sensitively and securely. Councillors are expected to maintain an awareness of the confidentiality of information that they have access to and not to share confidential information with anyone. Failure to properly observe confidentiality may be seen as a breach of the Council's Code of Conduct and will be dealt with through its prescribed procedures (at the extreme it may also involve a criminal investigation). Councillors should also be careful only to 'cc' essential recipients on emails, that is to avoid use of the 'Reply to All' option if at all possible, but of course copying in all who need to know and ensuring that email trails have been removed.