
DATA PROTECTION POLICY

Introduction

The Data Protection Act 1998 was updated in 2018 to cover the General Data Protection Regulation. The Act is concerned with personal data, that is information about living, identifiable individuals. This need not have to be sensitive data; it can be as little as a name and address. The Act gives individuals (data subjects) certain rights. It also requires those who record and use personal information (data controllers) to be open about their use of that information and to follow sound and proper practices (the Data Protection Principles). Data controllers are those who control the purpose and manner in which personal data is processed. Data subjects are the individuals to whom the personal data relate.

The Information Commissioner is responsible for administering and enforcing the Data Protection Act. They maintain a record of data controllers. As the Town Council holds personal information about living individuals on paper and computer eg details of planning applications, grant applications etc we have notified our registration with the ICO under the Data Protection Act.

Cleobury Mortimer Town Council, as Data Controller, recognises its responsibility to comply with the Data Protection Act. The Town Council will follow procedures that aim to ensure that all employees, elected members and working partners who have access to any personal data held by or on behalf of the Council are fully aware of and abide by their duties under the Act following the Data Protection Principles. Please see Appendix 1 – Privacy Policy. The Town Council has to collect and use information about people with whom it works. This may include members of the public, current, past and prospective employees, councillors, suppliers and working partners. This information must be handled and dealt with properly, however it is collected, recorded and used.

Privacy Notices

Being transparent and providing accessible information to individuals about how the Town Council uses personal data is a key element of the Data Protection Act and GDPR. The most common way to provide this information is in privacy notices, which inform individuals about what a local council does with their personal information. The Town Council has produced appropriate privacy notices and these contain the details of the Data Controller and Data Processor/Compliance Officer, the purpose for which the information is used and the length of time for its use. The privacy notices advise individuals of their rights relating to data. Please see Appendix 2 – General Privacy Notice, Appendix 3 - Privacy Consent Form, Appendix 4 - Email Contact Privacy Notice, Appendix 5 – Councillor Privacy Notice, Appendix 6 – Neighbourhood Plan Privacy Notice, Appendix 7 – Hirers Privacy Notice.

Data Protection Principles

The Town Council regards the lawful and correct treatment of personal information as very important to its successful operations and to maintaining confidence between the council and those with whom it carries out business. The Town Council will ensure that it treats personal information lawfully and correctly and to this end fully endorses and adheres to the Principles of Data Protection as set out in the General Data Protection Regulations which regulates how personal information can be collected, handled and used:

1. Data shall be processed fairly and lawfully - this means that personal information should only be collected from individuals if employees and Councillors have been open and honest about why they want the personal information. Processing covers retaining, recording or holding information.
2. Data shall be obtained and held only for specific and lawful purposes and not processed in any matter incompatible with those purposes.

3. Data shall be relevant, adequate and not excessive for those purposes. Data will be monitored so that too much or too little is not kept; only data that is needed should be held.
4. Data shall be accurate and kept up to date - personal data should be accurate, if it is not it should be corrected.
5. Data shall not be kept longer than it is needed – only in exceptional circumstances would data be kept indefinitely. In order to comply with this principle, we have a system for the removal of different categories of data after certain periods - See Appendix 8 - Data Retention and Disposal Policy.
6. Data shall be processed in a manner that ensures appropriate security and protection - this means that only employees and Councillors can access data. Only data that is relevant will be provided to external sources such as our auditor. Council will take adequate security measures to prevent unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data. See Appendix 9 – Security Incident Response Policy.

Rights of Data Subjects

GDPR gives individuals rights with some enhancements to those rights already in place:

- The right to access personal data the parish council holds on you (Appendix 10 – Subject Access Request Policy)
- The right to correct and update the personal data the parish council holds on you
- The right to have your personal data erased
- The right to object to the processing of your personal data or to restrict it to certain purposes only
- The right to request that the parish council transfers some of your data to another data controller
- The right to withdraw your consent to the processing at any time for any processing of data to which consent was obtained
- The right to lodge a complaint with the Information Commissioner’s Office.

Town Council Compliance

The Town Council recognises its responsibility to be open with people when taking personal details from them. This means that councillors and employees will be clear about why they want a particular piece of personal information and confirm it will only be used for the purpose it has been given and will not be disclosed to anyone else. Personal information is obtained directly from individuals ie when booking the Playing Field or through third parties ie Shropshire Council planning department or funeral directors. The Town Council has undertaken to manage personal data according to the Personal Data Management and Audit Policy – see Appendix 11.

Cleobury Mortimer Town Council has a legal obligation to publish documents as directed by legislation ie Accounts and Audit Regulations and the Transparency Code. Whilst it is common practice for Council documents to show signatures to prove authenticity, the signatures will be obliterated if the signatory so requests in writing, prior to publication. The Model Publication Scheme commits the Town Council to make information available to the public as part of its normal business activities. This scheme is approved by the Information Commissioner and covers classes of information and where this information is held - see Appendix 12 – Model Publication Scheme.

REVIEW

The effectiveness of this Policy and all associated arrangements are implemented and monitored through compliance checks as noted in these documents and subject to review every four years and more often if a change in legislation dictates. Next review June 2025

Further information about the Data Protection Act can be obtained from the Information Commissioner’s Office at Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF. Tel: 0303 123 1113. Website: www.ico.org.uk

Contact Details

Matthew Sheehan, Town Clerk

Cleobury Country Centre, Love Lane, Cleobury Mortimer, Worcestershire. DY14 8PE

Tel: 01299 271154. Email: matthew.sheehan@cleobury.org.uk

PRIVACY POLICY

This policy had been created in order to comply with the new General Data Protection Regulations (GDPR) which came into force on 25th May 2018 and supersedes the existing Data Protection Act 1998.

Your personal data – what is it?

“Personal data” is any information about a living individual, which allows them to be identified from that data (for example a name, photographs, videos, email address, or address). Identification can be by the personal data alone or in conjunction with any other personal data. The processing of personal data is governed by legislation relating to personal data, which applies in the United Kingdom including the General Data Protection Regulation (the “GDPR”) and other local legislation relating to personal data and rights such as the Human Rights Act.

Council information

This Privacy Policy is provided to you by Cleobury Mortimer Town Council, which is the data controller for your data. The Council’s address is: Cleobury Mortimer Town Council, Cleobury Country Centre, Love Lane, Cleobury Mortimer, DY14 8PE.

Other data controllers

- There are no joint controller arrangements.
- Other data controllers, such as Shropshire Council.
- Community groups
- Charities
- Other not for profit entities
- Contractors

The Council will process some or all of the following personal data where necessary to perform its tasks:

- Names, titles, and aliases, photographs;
- Contact details such as telephone numbers, addresses, and email addresses;
- Where they are relevant to the services provided by a council, or where you provide them to us, we may process demographic information such as gender, age, marital status, nationality, education/work histories, academic/professional qualifications, hobbies, family composition, and dependants;
- Where you pay for activities such as use of the Playing Fields, financial identifiers such as bank account numbers, payment card numbers, payment/transaction identifiers, policy numbers, and claim numbers;
- The data we process may include sensitive personal data or other special categories of data such as racial or ethnic origin, mental and physical health, details of injuries, medication/treatment received, political beliefs, trade union affiliation, genetic data, biometric data, data concerning and sex life or sexual orientation.

The Council will comply with data protection law. This says that the personal data we hold about you must be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about.
- Kept and destroyed securely including ensuring that appropriate technical and security measures are in place to protect your personal data to protect personal data from loss, misuse, unauthorised access and disclosure.

We use your personal data for some or all of the following purposes:

- To deliver public services including to understand your needs to provide the services that you request and to understand what we can do for you and inform you of other relevant services;
- To confirm your identity to provide some services;
- To contact you by post, email, telephone or using social media (e.g., Facebook or WhatsApp);
- To help us to build up a picture of how we are performing;
- To prevent and detect fraud and corruption in the use of public funds and where necessary for the law enforcement functions;
- To enable us to meet all legal and statutory obligations and powers including any delegated functions;
- To carry out comprehensive safeguarding procedures (including due diligence and complaints handling) in accordance with best safeguarding practice from time to time with the aim of ensuring that all children and adults-at-risk are provided with safe environments and generally as necessary to protect individuals from harm or injury;
- To promote the interests of the council;
- To maintain our own accounts and records;
- To seek your views, opinions or comments;
- To notify you of changes to our facilities, services, events and staff, councillors and role holders;
- To send you communications which you have requested and that may be of interest to you. These may include information about campaigns, appeals, other new projects or initiatives;
- To process relevant financial transactions including grants and payments for goods and services supplied to the council
- To allow the statistical analysis of data so we can plan the provision of services.

Our processing may also include the use of CCTV systems for the prevention and prosecution of crime.

What is the legal basis for processing your personal data?

The council is a public authority and has certain powers and duties. Most of your personal data is processed for compliance with a legal obligation which includes the discharge of the council's statutory functions and powers. Sometime when exercising these powers or duties it is necessary to process personal data of residents or people using the council's services. We will always take into account your interests and rights. This Privacy Policy sets out your rights and the council's obligations to you in detail.

We may also process personal data if it is necessary for the performance of a contract with you, or to take steps to enter into a contract. An example of this would be processing your data in connection with hiring the Playing Field. Sometimes the use of your personal data requires your consent. We will first obtain your consent to that use.

Sharing your personal data

The council will implement appropriate security measures to protect your personal data. This section of the Privacy Policy provides information about the third parties with whom the council will share your personal data. These third parties also have an obligation to put in place appropriate security measures and will be responsible to you directly for the manner in which they process and protect your personal data. It is likely that we will need to share your data with some or all of the following (but only where necessary):

Our agents, suppliers and contractors. For example, we may ask a commercial provider to publish or distribute newsletters on our behalf, or to maintain our database software;

On occasion, other local authorities or not for profit bodies with which we are carrying out joint ventures e.g. in relation to facilities or events for the community.

How long do we keep your personal data?

We will keep some records permanently if we are legally required to do so. We may keep some other records for an extended period of time. For example, it is current best practice to keep financial records for a minimum period of 8

years to support HMRC audits or provide tax information. We may have legal obligations to retain some data in connection with our statutory obligations as a public authority. The council is permitted to retain data in order to defend or pursue claims. In some cases, the law imposes a time limit for such claims (for example 3 years for personal injury claims or 6 years for contract claims). We will retain some personal data for this purpose as long as we believe it is necessary to be able to defend or pursue a claim. In general, we will endeavour to keep data only for as long as we need it. This means that we will delete it when it is no longer needed.

Your rights and your personal data

You have the following rights with respect to your personal data:

When exercising any of the rights listed below, in order to process your request, we may need to verify your identity for your security. In such cases we will need you to respond with proof of your identity before you can exercise these rights.

The right to access personal data we hold on you

The right to correct and update the personal data we hold on you

The right to have your personal data erased

The right to object to processing of your personal data or to restrict it to certain purposes only

The right to data portability

The right to withdraw your consent to the processing at any time for any processing of data to which consent was obtained

The right to lodge a complaint with the Information Commissioner's Office.

You can contact the Information Commissioners Office on 0303 123 1113 or via email

<https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF.

Transfer of Data Abroad

Any personal data transferred to countries or territories outside the European Economic Area ("EEA") will only be placed on systems complying with measures giving equivalent protection of personal rights either through international agreements or contracts approved by the European Union. Our website is also accessible from overseas so on occasion some personal data (for example in a newsletter) may be accessed from overseas.

Further processing

If we wish to use your personal data for a new purpose, not covered by this Privacy Policy, then we will provide you with a Privacy Notice explaining this new use prior to commencing the processing; setting out the relevant purposes and processing conditions. Where and whenever necessary, we will seek your prior consent to the new processing.

REVIEW

The effectiveness of this policy and associated arrangements will be reviewed every four years. Next review June 2025.

Contact Details

Please contact us if you have any questions about this Privacy Policy or the personal data we hold about you or to exercise all relevant rights, queries or complaints at: The Data Controller, Cleobury Mortimer Town Council, Cleobury Country Centre, Love Lane, Cleobury Mortimer, DY14 8PE.

Email: matthew.sheehan@cleobury.org.uk

Telephone: 01299 271154.

GENERAL PRIVACY NOTICE

Your personal data – what is it?

“Personal data” is any information about a living individual, which allows them to be identified from that data (for example a name, photographs, videos, email address, or address). Identification can be by directly using the data itself or by combining it with other information, which helps to identify a living individual. The processing of personal data is governed by legislation relating to personal data, which applies in the United Kingdom including the General Data Protection Regulation (the “GDPR”) and other legislation relating to personal data and rights such as the Human Rights Act.

Who are we?

This Privacy Notice is provided to you by Cleobury Mortimer Town Council which is the data controller for your data.

Other data controllers the Town Council may work with:

- Shropshire Council
- Other Town and Parish Councils
- Insurance Companies
- Police and Emergency services
- Community groups
- Housing Associations
- Charities
- Other not for profit entities
- Contractors
- Credit reference agencies

We may need to share your personal data we hold with them so that they can carry out their responsibilities to the council. If we and the other data controllers listed above are processing your data jointly for the same purposes, then the council and the other data controllers may be “joint data controllers” which mean we are all collectively responsible to you for your data. Where each of the parties listed above are processing your data for their own independent purposes then each of us will be independently responsible to you and if you have any questions, wish to exercise any of your rights (see below) or wish to raise a complaint, you should do so directly to the relevant data controller.

A description of what personal data the council processes and for what purposes is set out in this Privacy Notice.

The council will process some or all of the following personal data where necessary to perform its tasks:

- Names, titles, and aliases, photographs;
- Contact details such as telephone numbers, addresses, and email addresses;
- Where they are relevant to the services provided by a council, or where you provide them to us, we may process information such as gender, age, marital status, nationality, education/work history, academic/professional qualifications, hobbies, family composition, and dependants;
- Where you pay for activities such as use of a council hall, financial identifiers such as bank account numbers, payment card numbers, payment/transaction identifiers, policy numbers, and claim numbers;
- The personal data we process may include sensitive or other special categories of personal data such as criminal convictions, racial or ethnic origin, mental and physical health, details of injuries, medication/treatment received, political beliefs, trade union affiliation, genetic data, biometric data, data concerning and sexual life or orientation.

How we use sensitive personal data

- We may process sensitive personal data including, as appropriate:



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- your racial or ethnic origin or religious or similar information in order to monitor compliance with equal opportunities legislation;
 - in order to comply with legal requirements and obligations to third parties.
 - These types of data are described in the GDPR as “Special categories of data” and require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal data.
 - We may process special categories of personal data in the following circumstances:
 - In limited circumstances, with your explicit written consent.
 - Where we need to carry out our legal obligations.
 - Where it is needed in the public interest.
 - Less commonly, we may process this type of personal data where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else’s interests) and you are not capable of giving your consent, or where you have already made the information public.

Do we need your consent to process your sensitive personal data?

- In limited circumstances, we may approach you for your written consent to allow us to process certain sensitive personal data. If we do so, we will provide you with full details of the personal data that we would like and the reason we need it, so that you can carefully consider whether you wish to consent.

The Council will comply with data protection law. This says that the personal data we hold about you must be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about.
- Kept and destroyed securely including ensuring that appropriate technical and security measures are in place to protect your personal data to protect personal data from loss, misuse, unauthorised access and disclosure.

We use your personal data for some or all of the following purposes:

- To deliver public services including to understand your needs to provide the services that you request and to understand what we can do for you and inform you of other relevant services;
- To confirm your identity to provide some services;
- To contact you by post, email, telephone or using social media (e.g., Facebook, Twitter, WhatsApp);
- To help us to build up a picture of how we are performing;
- To prevent and detect fraud and corruption in the use of public funds and where necessary for the law enforcement functions;
- To enable us to meet all legal and statutory obligations and powers including any delegated functions;
- To carry out comprehensive safeguarding procedures (including due diligence and complaints handling) in accordance with best safeguarding practice from time to time with the aim of ensuring that all children and adults-at-risk are provided with safe environments and generally as necessary to protect individuals from harm or injury;
- To promote the interests of the council;
- To maintain our own accounts and records;
- To seek your views, opinions or comments;
- To notify you of changes to our facilities, services, events and staff, councillors and other role holders;
- To send you communications which you have requested and that may be of interest to you. These may include information about campaigns, appeals, other new projects or initiatives;

- To process relevant financial transactions including grants and payments for goods and services supplied to the council
- To allow the statistical analysis of data so we can plan the provision of services.

Our processing may also include the use of CCTV systems for the prevention and prosecution of crime.

What is the legal basis for processing your personal data?

The council is a public authority and has certain powers and obligations. Most of your personal data is processed for compliance with a legal obligation which includes the discharge of the council's statutory functions and powers. Sometimes when exercising these powers or duties it is necessary to process personal data of residents or people using the council's services. We will always take into account your interests and rights. This Privacy Notice sets out your rights and the council's obligations to you.

We may process personal data if it is necessary for the performance of a contract with you, or to take steps to enter into a contract. An example of this would be processing your data in connection with the use of sports facilities, or the acceptance of an allotment garden tenancy

Sometimes the use of your personal data requires your consent. We will first obtain your consent to that use.

Sharing your personal data

This section provides information about the third parties with whom the council may share your personal data. These third parties have an obligation to put in place appropriate security measures and will be responsible to you directly for the manner in which they process and protect your personal data. It is likely that we will need to share your data with some or all of the following (but only where necessary):

- The data controllers listed above under the heading "Other data controllers the council works with";
- Our agents, suppliers and contractors. For example, we may ask a commercial provider to publish or distribute newsletters on our behalf, or to maintain our database software;
- On occasion, other local authorities or not for profit bodies with which we are carrying out joint ventures e.g. in relation to facilities or events for the community.

How long do we keep your personal data?

We will keep some records permanently if we are legally required to do so. We may keep some other records for an extended period of time. For example, it is currently best practice to keep financial records for a minimum period of 8 years to support HMRC audits or provide tax information. We may have legal obligations to retain some data in connection with our statutory obligations as a public authority. The council is permitted to retain data in order to defend or pursue claims. In some cases, the law imposes a time limit for such claims (for example 3 years for personal injury claims or 6 years for contract claims). We will retain some personal data for this purpose as long as we believe it is necessary to be able to defend or pursue a claim. In general, we will endeavour to keep data only for as long as we need it. This means that we will delete it when it is no longer needed.

Your rights and your personal data

You have the following rights with respect to your personal data:

When exercising any of the rights listed below, in order to process your request, we may need to verify your identity for your security. In such cases we will need you to respond with proof of your identity before you can exercise these rights.

1) *The right to access personal data we hold on you*

- At any point you can contact us to request the personal data we hold on you as well as why we have that personal data, who has access to the personal data and where we obtained the personal data from. Once we have received your request we will respond within one month.
- There are no fees or charges for the first request but additional requests for the same personal data or requests which are manifestly unfounded or excessive may be subject to an administrative fee.



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- 2) ***The right to correct and update the personal data we hold on you***
- If the data we hold on you is out of date, incomplete or incorrect, you can inform us and your data will be updated.
- 3) ***The right to have your personal data erased***
- If you feel that we should no longer be using your personal data or that we are unlawfully using your personal data, you can request that we erase the personal data we hold.
 - When we receive your request we will confirm whether the personal data has been deleted or the reason why it cannot be deleted (for example because we need it for to comply with a legal obligation).
- 4) ***The right to object to processing of your personal data or to restrict it to certain purposes only***
- You have the right to request that we stop processing your personal data or ask us to restrict processing. Upon receiving the request we will contact you and let you know if we are able to comply or if we have a legal obligation to continue to process your data.
- 5) ***The right to data portability***
- You have the right to request that we transfer some of your data to another controller. We will comply with your request, where it is feasible to do so, within one month of receiving your request.
- 6) ***The right to withdraw your consent to the processing at any time for any processing of data to which consent was obtained***
- You can withdraw your consent easily by telephone, email, or by post (see Contact Details below).
- 7) ***The right to lodge a complaint with the Information Commissioner's Office.***
- You can contact the Information Commissioners Office on 0303 123 1113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF.

Transfer of Data Abroad

Any personal data transferred to countries or territories outside the European Economic Area ("EEA") will only be placed on systems complying with measures giving equivalent protection of personal rights either through international agreements or contracts approved by the European Union. Our website is also accessible from overseas so on occasion some personal data (for example in a newsletter) may be accessed from overseas.

Further processing

If we wish to use your personal data for a new purpose, not covered by this Privacy Notice, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions. Where and whenever necessary, we will seek your prior consent to the new processing.

REVIEW

The effectiveness of this Privacy Notice and associated arrangements will be reviewed every four years. Next review June 2025.

Contact Details

Please contact us if you have any questions about this Privacy Notice or the personal data we hold about you or to exercise all relevant rights, queries or complaints at:

The Data Controller, Cleobury Mortimer Town Council

Cleobury Country Centre

Love Lane

Cleobury Mortimer

DY14 8PE

Email: matthew.sheehan@cleobury.org.uk

Telephone: 01299 271154



PRIVACY CONSENT FORM

“Your privacy is important to us and we would like to communicate with you about the Council and its activities. To do so we need your consent. Please fill in your name and address and other contact information below and confirm your consent by ticking the boxes below.”

If you are aged 13 or under your parent or guardian should fill in their details below to confirm their consent

Name
Address

Signature
Date

Please confirm your consent below. You can grant consent to any or all of the purposes listed. You can find out more about how we use your data from our “Privacy Notice” which is available from our website www.cleobury.org.uk or from the Council Office at Cleobury Country Centre, Love Lane, Cleobury Mortimer, DY14 8PE

You can withdraw or change your consent at any time by contacting the Council Office.

- We may contact you to keep you informed about what is going on in the Council’s area or other local authority areas including news, events, meetings, clubs, groups and activities. These communications may also sometimes appear on our website, or in printed or electronic form (including social media).
- We may contact you about groups and activities you may be interested in participating in.
- We may use your name and photo in our newsletters, bulletins or on our website, or our social media accounts (for example our Facebook page).
- Used in any published, promotional material.

Keeping in touch:

- Yes please, I would like to receive communications by email
- Yes please, I would like to receive communications by telephone
- Yes please, I would like to receive communications by mobile phone including text message
- Yes please, I would like to receive communications by social media (for example Facebook, Twitter, Instagram, WhatsApp)
- Yes please, I would like to receive communications by post

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)

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 Data Protection Compliance Officer.

Information Security

Cleobury Mortimer Town 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 Cleobury Mortimer Town 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 our Data Information Officer: Matthew Sheehan matthew.sheehan@cleobury.org.uk or 01299 271154.

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 Matthew Sheehan matthew.sheehan@cleobury.org.uk or 01299 271154 to request this.

Information Deletion

If you wish Cleobury Mortimer Town Council to delete the information about you please contact Matthew Sheehan matthew.sheehan@cleobury.org.uk or 01299 271154 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 Matthew Sheehan matthew.sheehan@cleobury.org.uk or 01299 271154 to object.

Rights Related to Automated Decision Making and Profiling

Cleobury Mortimer Town 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 Cleobury Mortimer Town Council Data Information Officer:

Matthew Sheehan matthew.sheehan@cleobury.org.uk or 01299 271154

and the Information Commissioners Office casework@ico.org.uk Tel: 0303 123 1113

Summary

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

REVIEW

The effectiveness of this policy and associated arrangements will be reviewed every four years. Next review June 2025.

Contact Details:

M Sheehan, Clerk to CLEOBURY MORTIMER TOWN COUNCIL

Cleobury Country Centre, Love Lane, Cleobury Mortimer, DY14 8PE

Email Address: matthew.sheehan@cleobury.org.uk

Telephone: 01299 271154

COUNCILLOR PRIVACY NOTICE

When you sign your acceptance of office and take your seat on CLEOBURY MORTIMER TOWN 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 Councils Right to Process Information

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 Data Protection Compliance Officer.

Information Security

Cleobury Mortimer Town 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 Cleobury Mortimer Town 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 Data Information Officer Matthew Sheehan matthew.sheehan@cleobury.org.uk or 01299 271154.

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 Matthew Sheehan matthew.sheehan@cleobury.org.uk or 01299 271154 to request this.

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Right to Object

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Rights Related to Automated Decision Making and Profiling

Cleobury Mortimer Town 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 Cleobury Mortimer Town Council Data Information Officer:

Matthew Sheehan matthew.sheehan@cleobury.org.uk or 01299 271154

and the Information Commissioners Office casework@ico.org.uk Tel: 0303 123 1113

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

REVIEW

The effectiveness of this policy and associated arrangements will be reviewed every four years. Next review June 2025.

Contact Details:

M Sheehan, Clerk to CLEOBURY MORTIMER TOWN COUNCIL

Cleobury Country Centre, Love Lane, Cleobury Mortimer, DY14 8PE

Email Address: matthew.sheehan@cleobury.org.uk

Telephone: 01299 271154

NEIGHBOURHOOD PLAN PRIVACY NOTICE

When you attend a consultation event or return a survey or consultation document, 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 respond to your correspondence and provide information relating to the Neighbourhood Plan.

Your personal information will not be shared with any third party.

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)

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

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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

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REVIEW

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Contact Details:

M Sheehan, Clerk to CLEOBURY MORTIMER TOWN COUNCIL
Cleobury Country Centre, Love Lane, Cleobury Mortimer, DY14 8PE
Email Address: matthew.sheehan@cleobury.org.uk
Telephone: 01299 271154

HIRERS PRIVACY NOTICE

When you contact us

When you hire or hold an event on the Playing Field, 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 respond to your correspondence, provide information, send invoices and receipts relating to your hire agreement. Your personal information will not be shared with any third party without your prior consent.

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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.

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DATA RETENTION AND DISPOSAL POLICY

Introduction

Cleobury Mortimer Town Council accumulates a vast amount of 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.

Records created and maintained by the Council are an important asset and as such measures need to be undertaken to safeguard this information. Effectively managed records provide authentic and reliable evidence of the Council's transactions and are necessary to ensure it can demonstrate accountability.

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.

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.

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.

Scope and Objectives of the Policy

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.

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' slips.
- Catalogues and trade journals.
- 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.

Duplicated and superseded material such as stationery, manuals, drafts, forms, address books and reference copies of annual reports may be destroyed.

Records should not be destroyed if the information can be used as evidence to prove that something has happened.

Roles and Responsibilities for Document Retention and Disposal

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.

Councils should ensure that all employees are aware of the retention/disposal schedule.

Document Retention Protocol

Councils should have in place an adequate system for documenting the activities of their service. This system should take into account the legislative and regulatory environments to which they work.

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.

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 records office.

The retention schedule in this document provides guidance on the recommended minimum retention periods for specific classes of documents and records. These schedules have been compiled from recommended best practice from the Public Records Office, the Records Management Society of Great Britain and in accordance with relevant legislation.

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.

Document Disposal Protocol

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?

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 complying with the General Data Protection Regulations.

Documents can be disposed of by any of the following methods:

- Non-confidential records: place in wastepaper bin for disposal.
- Confidential records or records giving personal information: shred documents.
- Deletion of computer records.
- Transmission of records to an external body such as the County Records Office.

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).

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.

Data Protection Act 2018 – Obligation to Dispose of Certain Data

The Data Protection Act 2018 ('Fifth Principle') requires that personal information must not be retained longer than is necessary for the purpose for which it was originally obtained. Section 1 of the Data Protection Act defines personal information 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.

The Data Protection Act provides an exemption for information about identifiable living individuals that is held for research, statistical or historical purposes to be held indefinitely provided that the specific requirements are met.

Councils are responsible for ensuring that they comply with the principles of the under 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.

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

Scanning of Documents

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.

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

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.

List of Documents

The full list of the Council's documents and the procedures for retention or disposal can be found in the table below:

Document	Min Retention Period	Reason	Disposal
COUNCIL MANAGEMENT			
Minutes of Council Meetings /committee meetings and working party meetings	Indefinite	Legal record / Archive	Minutes must be kept in safe storage at regular intervals or not more than 10 years they must be deposited with Shropshire Archives.
Draft minutes	Until the date of confirmation of the minutes	operational	Bin / shred confidential items
Agendas Reports and other documents circulated with agendas	12 years	Statute of limitations	Bin / shred confidential items
Council Standing Orders, Policies & Procedures	Whilst the documents remain in force	Management	Bin
Attendance Register	Throughout the 4-year term of office	Management	Shred
Declarations of acceptance of office	Indefinitely	archive	
Register of electors	Until there is no longer an administrative requirement.	Copies already in existence	shred
Members Register of Interests	6 years or until they vacate office. (whichever is the greater)	Audit, Tax, VAT	Shred
FINANCE			
Paid Invoices	6 years	VAT	Shred
Cheques book stubs	Last completed audit year	Audit	Shred
Bank Paying-in Books	Last completed audit year	Audit	Shred
Bank Statements (including deposit/ savings / investment accounts)	Last completed audit year	Audit	Shred
Receipt Books	6 years	VAT	bin
Cash Book accounts,	Indefinite	Archive	n/a

Scales of Fees charges	6 years	Management	bin
VAT records	6 years – 20 years for VAT on rents	VAT inspections	Shred
Petty Cash / postage records	6 years	VAT, Tax Statute of Limitations	Shred
Payroll	12 years	Superannuation	Shred
Pension records	Two years after the former employee dies	Recommendation from SLCC	Shred
Quotation and Tenders	6 years	Limitation Act 1980	Shred – a list will be kept of those documents disposed of to meet requirements of GDPR
Title Deeds, leases agreements and contracts	Indefinite	Audit Management	n/a
Investments	Indefinite	Audit, management	n/a
Annual Return including audited accounts	Indefinite	Audit Management	n/a
Precept requests	Indefinitely	Audit, Management	n/a
Insurance Cert of Employers Liability	40 years from date in which insurance commenced or was renewed	Should a claim arise	Bin
Insurance Company names a policy number	Indefinite	Management	n/a
Insurance Policies	While Valid	Management	Bin
Insurance Claim Records	7 Years after all obligations are concluded	Employers Liability Act 1969 Employers liability regulations 1998	Shred a list will be kept of those documents disposed of to meet the requirements of the GDPR.
Grant applications	6 years	Management	Shred



Timesheets	3 years	Personal injury best practice	bin
Members allowances	6 years	Tax, Limitation Act 1980	Shred a list will be kept of those documents disposed of to meet the requirements of the GDPR.
Payroll	12 years	Superannuation	Shred a list will be kept of those documents disposed of to meet the requirements of the GDPR.
BURIAL			
Register of fees collected Register of burials Register of purchased graves Register/ plan of grave spaces Register of memorials Applications for interment Application for right to erect memorials Disposal certificates Copy of Exclusive right of Burial Certificates	Indefinite	Archives, Local Authorities Cemeteries Order 1977 (SI.204)	n/a
HEALTH AND SAFETY			
Accident / incident reports	20 years	Potential claims	Shred – a list will be kept of those documents disposed of to comply with GDPR regulations

Premises Inspection Records	12 Years	Statute of Limitations	Bin
Risk Assessments	Once superseded by a new risk assessment or once inactive		Bin
Asset Equipment records	21years	Statute of Limitations	Bin
LEGAL MATTERS, NEGLIGENCE and TORTS			
Negligence	6 years	Statute of Limitations Act 1980 (as amended)	Shred – a list will be kept of those documents disposed of to comply with GDPR regulations
Defamation	1 year		Shred – a list will be kept of those documents disposed of to comply with GDPR regulations
Contract	6 years		Shred – a list will be kept of those documents disposed of to comply with GDPR regulations
Leases	12 years		Shred
Sums recoverable by statute	6 years		Shred
Personal injury	3 years		Shred
To recover land	12 years		Shred
Rent	6 years		Shred
Breach of Trust	None		Shred
Trust Deeds	Indefinite		N/A
PERSONNEL RECORDS			
Recruitment Application forms (interviewed - unsuccessful)	1 year after recruitment finalised	Equality Act	Shred

Personnel files (not payroll information)	6 years after ceasing employment	Statute of Limitations	Shred
PLANNING			
Planning Applications	1 year	Management	bin
Planning Appeals	1 year unless development is significant	Management	bin
Trees	1 year	Management	bin
Planning Policy/ Local Development Reviews	Whilst document remains in force	reference	bin
Correspondence relating to planning applications	5 years after development completed	Management	
Local connection Applications and evidence	Until after Town Council has considered applications maximum 3 months	To verify applications for local connection	Shred
CCTV			
Review requests	3 years	Data Protection	Shred
Discs	For as long as required	Data protection	Shred
Photographs/ digital prints	31 days	Data protection	Shred
GENERAL			
Routine correspondence, papers & emails	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	Bin (shred confidential items)
Correspondence relating to staff	If related to Audit, see relevant sections above.	After an employment relationship has ended, a council may need to retain and access staff records for	Shred – a list will be kept of those documents disposed

	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	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.	of to comply with GDPR regulations
General Information of historic importance	Indefinite -to be securely kept for the town or offered to Shropshire Archives if no longer of use or value	Management	
Press Releases	2 years	Management	Bin
Surveys & returns	Until project completed	Management	Bin, if contains contact details Shred – a list will be kept of those documents disposed of to comply with GDPR regulations
Information. from other bodies e.g. circulars, newsletters, magazines etc	Retain as long as useful		Bin
Town Council newsletters/ Annual Reports	Indefinitely -The Legal Deposit Libraries Act 2003 (the 2003 Act) requires a local council which after 1 st 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	Archive	

	works as defined by the 2003 Act published by a local council therefore constitute materials which the British Library holds		
Byelaws and orders	Preserve one of each and transfer for records office once they become inactive	Common practice	

Contact Details:

Cleobury Mortimer Town Council

Cleobury Country Centre, Love Lane, Cleobury Mortimer, DY14 8PE

Tel: Office - 01299 271154

REVIEW

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SECURITY INCIDENT RESPONSE POLICY

Cleobury Mortimer Town Council understands that planning for a breach is essential to ensure that it has a process in place to deal with a breach at short notice should it occur.

1. **The Breach Response Plan below sets out the key issues, which the council has considered in preparing for a data breach.**
 - (a) The Clerk should be notified immediately of a suspected breach and in the absence of the Clerk, the Chairman should be notified.
 - (b) The Clerk in consultation with the Chairman will take responsibility with delegated authority to manage the breach. An extraordinary meeting of the Council may be called if required.
The Clerk will consult other data controllers or contractors as a matter of urgency for any external assistance as necessary and this is covered in the Council's Privacy Policy and Subject Access Request Policy.
 - (c) The Clerk will consult other data controllers or contractors as a matter of urgency for any external assistance as necessary and this is covered in the Council's Privacy Policy and Subject Access Request Policy.
 - (d) The Clerk may, depending upon the nature of the breach, need to contact others to identify any actual breach and activate a breach response team if the extent of the breach requires.
 - (e) The Council will review its response plan each year, testing the process with others if required.

2. **Legal issues**
 - (a) The Council will maintain legal privilege and confidentiality where required.
 - (b) Should a pause of document destruction processes be required, the Clerk will instruct, as necessary.
 - (c) The Clerk will lead on gathering appropriate evidence and information about the breach.
 - (d) The Council if required will contact its lawyers to manage the investigation and give legal advice.
 - (e) The Clerk will ensure that steps to manage the investigation are recorded.
 - (f) Contractual rights and obligations with third parties are set out in the Council's Privacy Policy.
 - (g) The Council may need to notify third parties as set out in the Council's Personal Data Management and Audit Policy.
 - (h) The Council sets out its contractual rights within its policies and contracts with others.
 - (i) The Council will contact the Information Commissioners Office ("ICO") and its local law enforcement officer where necessary.
 - (j) The Council may take advice from its legal advisers on the legal options available to gather evidence from third parties.
 - (k) The Clerk will consult with its legal advisers and/or insurers on potential liabilities to third parties.

3. **IT**
 - (a) The Clerk will consult with its IT consultant where required in managing potential risk and responding to a data breach.
 - (b) The Council's asset register will identify devices where a potential breach may occur.
 - (c) The flow of data is set out in the Council's Communications Statement.



- (d) The Clerk will consult with its IT consultant to quickly secure and isolate potentially compromised devices and data, without destroying evidence should this be necessary.
- (e) The Clerk will ensure the quick physical security of premises should this be necessary.

4. Cyber breach insurance

- (a) The Council takes advice from its insurers on cyber breach insurance and actions on notifying and obtaining consents should a breach occur.
- (b) The Clerk holds emergency contact details.

5. Data

- (a) Data held by the Council is set out in the Personal Data Management and Audit Policy, which includes its classification, destruction time and risk assessments, which includes protections for any sensitive data.
- (b) The Clerk liaises with its IT consultant, should encryption be necessary
- (c) The Clerk will ensure that data is held no longer than required.

6. Data subjects

- (a) The Council has in place Subject Access Request and Privacy Policies with appropriate notices which are published on its websites: These include notifying data subjects and contractual and legal rights of data subjects.
- (b) The Council will provide appropriately worded notifications to data subjects.
- (c) The Council has in place its policies and notices in compliance with GDPR, recognising the potential harm to data subjects should loss of data held by the Council occur.
- (d) The Council is committed to arranging appropriate training for councillors and staff with includes action in the event of a breach.

7. Public Relations

- (a) The Council will consult its legal advisers in dealing with data breaches particularly with pro-active and re-active press statements.
- (b) The Council will put in place arrangements to monitor media reaction as required after any breach.

REVIEW

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Contact Details

Please contact us if you have any questions about this Policy or the personal data we hold about you or to exercise all relevant rights, queries or complaints at: The Data Controller, Cleobury Mortimer Town Council, Cleobury Country Centre, Love Lane, Cleobury Mortimer, DY14 8PE.

Email: matthew.sheehan@cleobury.org.uk

Telephone: 01299 271154.

SUBJECT ACCESS REQUEST POLICY

Data subjects have the right to access personal data held on them by the Council. Details are set out in the Privacy Notice on the Council's website.

This policy is in place to ensure that internal procedures on handling of SARs are accurate and complied with and includes:

- (1) Responsibilities (who, what)
- (2) Timing
- (3) Changes to data
- (4) Handling requests for rectification, erasure or restriction of processing.

The Council will ensure that personal data is easily accessible at all times in order to ensure a timely response to SARs and that personal data on specific data subjects can be easily filtered.

The Council has implemented standards on responding to SARs.

1. Upon receipt of a SAR

- (a) The data subject will be informed who at the Council to contact, the Data Protection Compliance Officer.
- (b) The identity of the data subject will be verified and if needed, any further evidence on the identity of the data subject may be requested.
- (c) The access request will be verified; is it sufficiently substantiated? Is it clear to the data controller what personal data is requested? If not, additional information will be requested.
- (d) Requests will be verified as to them being unfounded or excessive (in particular because of their repetitive character); if so, the Council may refuse to act on the request or charge a reasonable fee.
- (e) Receipt of the SAR will be promptly acknowledged and the data subject will be informed of any costs involved in the processing of the SAR.
- (f) Whether the Council processes the data requested will be verified. If the Council does not process any data, the data subject will be informed accordingly. At all times the internal SAR policy will be followed and progress may be monitored.
- (g) Data will not be changed as a result of the SAR. Routine changes as part of the processing activities concerned may be permitted.
- (h) The data requested will be verified to establish if it involves data on other data subjects. This data will be filtered before the requested data is supplied to the data subject; if data cannot be filtered, other data subjects will be contacted to give consent to the supply of their data as part of the SAR.

2. Responding to a SAR

- (a) The Council will respond to a SAR within one month after receipt of the request:
 - (i) If more time is needed to respond to complex requests, an extension of another two months is permissible, and this will be communicated to the data subject in a timely manner within the first month;
 - (ii) if the council cannot provide the information requested, it will inform the data subject on this decision without delay and at the latest within one month of receipt of the request.



- (b) If a SAR is submitted in electronic form, any personal data will be preferably provided by electronic means as well.
- (c) If data on the data subject is processed, the Council will ensure as a minimum the following information in the SAR response:
 - (i) the purposes of the processing;
 - (ii) the categories of personal data concerned;
 - (iii) the recipients or categories of recipients to whom personal data has been or will be disclosed, in particular in third countries or international organisations, including any appropriate safeguards for transfer of data, such as Binding Corporate Rules or EU model clauses
 - (iv) where possible, the envisaged period for which personal data will be stored, or, if not possible, the criteria used to determine that period;
 - (v) the existence of the right to request rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing;
 - (vi) the right to lodge a complaint with the Information Commissioners Office (“ICO”);
 - (vii) if the data has not been collected from the data subject: the source of such data;
 - (viii) the existence of any automated decision-making, including profiling and any meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.
- (d) Provide a copy of the personal data undergoing processing.

Implementing the Subject Access Requests Policy – Council Checklist on what **MUST** be done

On receipt of a subject access request it must be **forwarded** immediately to the DPCO who will **identify** whether a request has been made under the Data Protection legislation

1. A member of staff, and as appropriate, councillor, who receives a request to locate and supply personal data relating to a SAR **must** make a full exhaustive **search** of the records to which they have access.
2. All the personal data that has been requested **must be provided** unless an exemption applies. (This will involve a search of emails/recoverable emails, word documents, spreadsheets, databases, systems, removable media (for example, memory sticks, floppy disks, CDs), tape recordings, paper records in relevant filing systems.)
3. A **response must** be provided within one calendar month after accepting the request as valid.
4. Subject Access Requests **must** be undertaken **free of charge** to the requestor unless the legislation permits reasonable fees to be charged.
5. Councillors and Clerks/managers **must** ensure that the staff they manage are **aware** of and follow this guidance.
6. The Council **must** provide where necessary an explanation with the personal data in an “intelligible form”, which will include giving an explanation of any codes, acronyms and complex terms. The personal data will be supplied in a permanent form except where the requestor agrees or where it is impossible or would involve undue effort. Agreement may be sought with the requestor that they will view the personal data on screen or inspect files on Council premises. Any exempt personal data will be redacted from the released documents with explanation why that personal data is being withheld.
7. The Council **must** ensure a request has been received in writing where a data subject is asking for sufficiently well-defined personal data held by the council relating to the data subject. What personal data is needed will be clarified with the requestor, who must supply their address and valid evidence to prove their identity. The council accepts the following forms of identification (* These documents must be dated in the past 12 months, +These documents must be dated in the past 3 months):



- Current UK/EEA Passport
- UK Photocard Driving Licence (Full or Provisional)
- Firearms Licence / Shotgun Certificate
- EEA National Identity Card
- Full UK Paper Driving Licence
- State Benefits Entitlement Document*
- State Pension Entitlement Document*
- HMRC Tax Credit Document*
- Local Authority Benefit Document*
- State/Local Authority Educational Grant Document*
- HMRC Tax Notification Document
- Disabled Driver's Pass
- Financial Statement issued by bank, building society or credit card company+
- Judiciary Document such as a Notice of Hearing, Summons or Court Order
- Utility bill for supply of gas, electric, water or telephone landline+
- Most recent Mortgage Statement
- Most recent council Tax Bill/Demand or Statement
- Tenancy Agreement
- Building Society Passbook which shows a transaction in the last 3 months and your address

8. Where a requestor is not satisfied with a response to a SAR, the council **must** manage this as a **complaint** under the Council's Complaints Policy.

REVIEW

The effectiveness of this policy and associated arrangements will be reviewed every four years. Next review June 2025.

Contact Details:

M Sheehan, Clerk to CLEOBURY MORTIMER TOWN COUNCIL
Cleobury Country Centre, Love Lane, Cleobury Mortimer, DY14 8PE
Email Address: matthew.sheehan@cleobury.org.uk
Telephone: 01299 271154

PERSONAL DATA MANAGEMENT AND AUDIT POLICY

Data Management

The GDPR places a much greater emphasis on transparency, openness and fairness than previous legislation required. The Town Council as Data Controller will ensure the Principles of Data Protection legislation will be followed in the management of personal data and that employees and councillors understand the requirements of the new legislation.

The Clerk (as Data Processor) will follow the underlying principles that personal data:

- (a) Must be processed lawfully, fairly and transparently.
- (b) Is only used for a *specific processing purpose* that the data subject has been made aware of and no other, without further consent.
- (c) Should be *adequate, relevant and limited* i.e. only the minimum amount of data should be kept for specific processing.
- (d) Must be *accurate* and where necessary *kept up to date*.
- (e) Should *not be stored for longer than is necessary*, and that storage is safe and secure.
- (f) Should be processed in a manner that ensures *appropriate security and protection*.

The Clerk will manage subject access requests allowing data subjects to exercise their rights under the GDPR:

The right to access personal data we hold on you

The right to correct and update the personal data we hold on you

The right to have your personal data erased

The right to object to processing of your personal data or to restrict it to certain purposes only

The right to data portability

The right to withdraw your consent to the processing at any time for any processing of data to which consent was obtained

The right to lodge a complaint with the Information Commissioner's Office.

The Council, as Data Controller has adopted a Privacy Policy and Subject Access Request Policy. These, together with the Privacy Notice, are available to view on the Council website or via the Clerk.

The Clerk, as Data Compliance Officer will

- Ensure that data is held securely, password controlled on a need to know basis and back-up systems are in place
- Maintain a processing log of data
- Ensure that data is held no longer than is necessary and follows guidelines for its deletion
- Ensure that Consent Forms are obtained where necessary, recorded and reviewed as necessary
- Undertake data protection impact assessments where required for new projects as directed by the Council as Data Controller and advice of the DPO.
- Ensure the notification of personal data breaches in consultation with the DPO and the Council's Security Incident Response Policy
- In consultation with the DPO, report to Council on progress in compliance with GDPR to include any required monitoring identified.

Data Audit

SUBJECT	Nature/purpose of processing	Type of data/where is it from	Who is the data subject?	Lawful basis/bases for processing	Data Controls
Planning Applications	Consultations and decisions published by the Planning Authority, and shared with Town Council. Clerk emails details of each application and decision to Town councillors. Also published with agenda and minutes, and discussed in open forum. Town council comments on application provided by Planning Authority	Name and contact information; Principal authority; residents/public	Planning applicant/resident; other members of the public speaking in open public session at council meetings	Compliance with legal obligation	<ul style="list-style-type: none"> • Clerk to check all information before sharing with town councillors, and ensure sensitive personal data is redacted wherever possible before sharing or publishing. • Information in agenda and minutes to include only what is necessary to identify and discuss the application or decision. • Any correspondence between Town Council and applicant to be in accordance with data protection principles, and to be deleted within two years.
Electoral roll	Provided to Clerk annually and at election time for election purposes only	Provided by Principal Authority contains names, addresses, marital status.	Parish residents	Compliance with legal obligation	Clerk to retain in a secure place, not to be shared; members of the public to be directed to Principal Authority for any electoral roll queries.

Parish Newsletter/Resident Surveys	Inform residents and gain views of residents	Resident Names and Contact details- from residents	Residents	Consent	Clerk to retain in a secure place and obtain consent form. Not to be used for other purpose unless consent is given.
Website	Information relating to the Parish is published on the website	Residents names and photographs	Members of public	Consent; compliance with legal obligation	Photographs of individuals are not be published on the website without the express permission of the individual and deleted after a maximum of two years. No copy of the photograph shall be retained by the Town Council
Councillor details	Clerk retains contact details/gathered for election purposes/published in accordance with Transparency Code and Code of Conduct	Name, address, contact details, and disclosable pecuniary interests	Town Councillors	Compliance with legal obligation	Details published on website in accordance with statutory requirements. Data held by Clerk, on the Town Council computer, and deleted when a councillor retires from office. Requests for this data from third parties shall be referred to the website.
Correspondence from members of the public/residents/other parties relating to parish matters which may contain personal data.	May relate to Council services, Council performance, request for service, reporting issues or making complaints	Name, address, contact details, with possible sensitive personal data, depending on the nature of the matter; provided by residents	Members of the Public/Residents	Public interest; compliance with legal obligation	<ul style="list-style-type: none"> • Any email letter or other form of query received by the TC which contains personal data will be retained for a maximum of two years • Such data may be stored on the TC computer, held by the Clerk in a secure place. • The agreed privacy notice shall be provided to any person who contacts the TC. • In accordance with the agreed privacy notice, such data shall not be shared with any third party without the express permission of the data subject.
Minutes containing Council Public Forum	Matters raised by members of the public at Council meetings; Minutes include a record of discussion as required	Names and possibly other information	Residents/members of the public	Compliance with legal obligation; public interest	<ul style="list-style-type: none"> • Clerk should try to avoid inclusion of personal data in agenda or minutes. Where personal data or potential identifiers cannot be avoided, these should be kept to a minimum.



	by Local Government legislation				<ul style="list-style-type: none"> Members of the public who attend the public forum or the annual meeting should be informed by the Chair that the issue may be included in public minutes, and should give their consent to this before the discussion (consent to be implied as Chair gives the members of the public the chance to withdraw from the meeting if they wish).
Contact with public in response to requests made at TC meetings	Letter/email to residents asking them to perform actions (eg trim trees or hedges)	Names, addresses and possibly other personal data provided by Cllrs/residents	Residents/members of the public	Compliance with legal obligation; public interest	<ul style="list-style-type: none"> Copy to be retained on TC computer, held by Clerk in a secure place, for a maximum of two years. Information shall not be shared with any third party without express permission of the data subject.
Council Contracts and Services	Correspondence with contractors/public to carrying out contracting work and services required by the Council;	Names, contact details, qualifications, financial details, details of certificates and diplomas, education and skills; provided in contract applications etc	Contractors/Trades persons surveyors, architects, builders, suppliers, advisers, payroll processors;	Contractual necessity	Copy to be retained on TC computer, held by Clerk in a secure place, for life of contract
Employment Applications	Application forms and CVs for Job Vacancies	Applicants provide personal details which may be sensitive	Applicants	Contractual Necessity	Clerk to keep paper applications secure and collect any copies from councillors provided for interview; Held for 6 months and then destroyed.
Employee and former employee records	Contracts of employment, CVs, provided on recruitment and held on file	Personal data provided by employees	Employees and Former employees	Contractual necessity and compliance	Held secure by the Clerk with restricted access and shredded 6 years after employment ends; may contain sensitive personal data

				with legal obligation	
CCTV	Reviewing video data for police matters, insurance or anti-social behaviour purposes.	Video footage from CCTV cameras.	Members of public	Public safety	Clerk to ensure data processed according to data protection principles and CCTV Policy.
Consider any other Subject where personal data may be held	Personal data which comes under the control of the TC which does not fit into any of the categories above	Names, addresses and possible other personal data.			<ul style="list-style-type: none"> • Clerk to process the data in accordance with the data protection principles, always ensuring that personal data is stored securely and not shared with any third party without the express permission of the data subject. • Clerk may need to bring report to Council to determine the way in which the data should be controlled, taking advice from the DPO and if necessary, provide a Personal Data Impact Assessment

Contact Details:

Cleobury Mortimer Town Council

Cleobury Country Centre, Love Lane, Cleobury Mortimer, DY14 8PE

Tel: Office - 01299 271154

REVIEW

The effectiveness of this policy and associated arrangements will be reviewed every four years. Next review June 2025.

MODEL PUBLICATION SCHEME

This Model Publication Scheme has been prepared and approved by the Information Commissioner. It may be adopted without modification by any public authority without further approval and will be valid until further notice. This Publication Scheme commits an authority to make information available to the public as part of its normal business activities. The information covered is included in the classes of information mentioned below, where this information is held by the authority. Additional assistance is provided to the definition of these classes in sector specific guidance manuals issued by the Information Commissioner.

The Scheme commits an authority:

- To proactively publish or otherwise make available as a matter of routine, information, including environmental information, which is held by the authority and falls within the classifications below.
- To specify the information which is held by the authority and falls within the classifications below.
- To proactively publish or otherwise make available as a matter of routine, information in line with the statements contained within this scheme.
- To produce and publish the methods by which the specific information is made routinely available so that it can be easily identified and accessed by members of the public.
- To review and update on a regular basis the information the authority makes available under this Scheme.
- To produce a schedule of any fees charged for access to information which is made proactively available.
- To make this Publication Scheme available to the public.

Classes of Information

CLASS 1 - Who we are and what we do.

Organisational information, locations and contacts, constitutional and legal governance.

CLASS 2 - What we spend and how we spend it.

Financial information relating to projected and actual income and expenditure, tendering, procurement and contracts.

CLASS 3 - What our priorities are and how we are doing.

Strategy and performance information, plans, assessments, inspections and reviews.

CLASS 4 - How we make decisions.

Policy proposals and decisions, decision making processes, internal criteria and procedures, consultations.

CLASS 5 - Our policies and procedures.

Current written protocols for delivering our functions and responsibilities.

CLASS 6 - Lists and Registers.

Information held in registers required by law and other lists and registers relating to the functions of the authority.

CLASS 7 - The Services we offer.

Advice and guidance, booklets and leaflets, transactions, media releases and a description of the services offered.

The classes of information will not generally include:

Information, the disclosure of which is prevented by law, or exempt under the Freedom of Information Act, or is otherwise properly considered to be protected from disclosure.

Information in draft form.

Information that is no longer readily available as it is contained in files that have been placed in archive storage or is difficult to access for similar reasons.

The method by which information published under this Scheme will be made available.

The authority will indicate clearly to the public what information is covered by this Scheme and how it can be obtained. Where it is within the capability of a public authority, information will be provided on a website. Where it is impracticable to make information available on a website or when an individual does not wish to access the information by the website, a public authority will indicate how information can be obtained by other means and provide it by those means.

In exceptional circumstances, some information may be available only by viewing in person. Where this manner is specified, contact details will be provided. An appointment to view the information will be arranged within a reasonable timescale.

Information will be provided in the language in which it is held or in such other language that is legally required. Where an authority is legally required to translate any information, it will do so.

Obligations under disability and discrimination legislation and any other legislation to provide information in other forms and formats will be adhered to when providing information accordance with the Scheme.

Charges which may be made for information published under this Scheme.

The purpose of this Scheme is to make the maximum amount of information readily available at minimum inconvenience and cost to the public. Charges made by the authority for routinely published material will be justified and transparent and kept to a minimum.

Material which is published and accessed on a website will be provided free of charge.

Charges may be made for information subject to a charging regime specified by Parliament.

Charges may be made for actual disbursements incurred such as:

- Photocopying
- Postage and packaging
- The costs directly incurred as a result of viewing information.

Charges may also be made for information provided under this Scheme where they are legally authorised; they are in all circumstances, including the general principles of the right of access to information held by public authorities, justified and are in accordance with a published schedule or schedules of fees which is readily available to the public. If a charge is to be made, confirmation of the payment due will be given before the information is provided. Payment may be requested prior to provision of the information.

Written Requests

Information held by a public authority that is not published under this Scheme can be requested in writing, when its provision will be considered in accordance with the provisions of the Freedom of Information Act and the General Data Protection Regulation.

Schedule of Information available from Cleobury Mortimer Town Council under the Freedom of Information Model Publication Scheme

Information to be published	How the information can be obtained	Cost
CLASS 1 - Who we are and what do we do (organisational information, structures locations and contacts)		
Who's who on the Council and its committees	Website Hard copy	Free 10p/sheet
Contact details for Town Clerk and Council Members (named contacts where possible with telephone number and email address)	Website Newsletter Hard copy	Free Free 10p/sheet
CLASS 2 – What we spend and how we spend it (financial information relating to projected and actual income and expenditure, procurement contracts and financial audit)		
Annual return form and report by auditor	Website Hard Copy	Free 10p/sheet
Finalised budget	Website Hard Copy	Free 10p/sheet
Precept	Website Hard Copy	Free 10p/sheet
Borrowing Approval Letter	n/a	
Financial Regulations	Hard Copy	10p/sheet
Grants given and received	Hard Copy	10p/sheet
List of current contracts awarded and value of contract	Hard copy	10p/sheet
Members allowances and expenses	Hard Copy	10p/sheet
CLASS 3 What our priorities are and how we are doing (strategies and plans, performance indicators, audits, inspections and reviews)		
3-Year Business Plan	Website Hard copy	Free 10p/sheet
Annual Report to Parish Meeting (current and previous year as a minimum)	Website Hard copy	Free 10p/sheet
Quality Status	Hard Copy	10p/sheet
Local Charters drawn up in accordance with DCLG guidelines	n/a	
CLASS 4 How we make decisions		



(decision making processes and records of decisions)		
Timetable of meetings (Council, any committee, subcommittee meetings and parish meetings)	Website Hard copy	Free 10p/sheet
Agendas of meetings (as above)	Website Hard copy, notice boards	Free 10p/sheet
Minutes of meetings (as above) – nb this will exclude information that is properly provided as private to the meeting	Website Hard copy	Free 10p/sheet
Reports presented to council meetings nb this will exclude information that is properly provided as private to the meeting	Hard Copy	10p/sheet
Responses to consultation papers	Hard Copy	10p/sheet
Responses to planning applications	Hard Copy	10p/sheet
Byelaws	n/a	
Class 5 – Our policies and procedures (Current written protocols, policies and procedures for delivering our services and responsibilities)		
Policies and procedures for the conduct of council business Procedural Standing Orders Committee and Subcommittee terms of reference Delegated authority in respect of officers Code of Conduct Policy Statements	Website Hard Copy	Free 10p/sheet
Policies and Procedures for the provision of services and about employment of staff Internal policies relating to the delivery of services Equality and Diversity Policy Health and Safety Policy Policies and procedures for handling requests for information	Website Hard Copy	Free 10p/sheet
Complaints procedures (including those covering requests for information and operating the publication scheme)	Website Hard copy	Free 10p/sheet
Records management policy (records retention, destruction and archive)	Website Hard copy	Free 10p/sheet
Data Protection policies	Website Hard Copy	Free 10p/sheet
Schedule of charges (for the publication of information)	Website Hard copy	Free 10p/sheet
CLASS 6 - Lists and Registers (Currently maintained lists and registers only)		
Asset Register	Hard copy	10p/sheet
Disclosure Log (indicating information that has been provided in response to requests)	Hard Copy	10p/sheet

recommended as good practice but may not be held by councils)		
Register of members interests	Website Hard copy	Free 10p/sheet
Register of gifts and hospitality	Hard copy	10p/sheet
Class 7 - The Services we offer (Information about the services we offer, including leaflets, guidance and newsletters produced for the public and businesses)		
Allotments	n/a	
Burial Grounds and Closed Churchyard	Inspection	Free (by appointment)
Community centres and village halls	Website	Free
Parks, playing fields and recreational facilities	Inspection	Free (by appointment)
Seating, litter bins, memorials and lighting	Inspection	Free (by appointment)
Bus shelters	Inspection	Free (by appointment)
Markets	n/a	
Public Conveniences	Inspection	Free (by appointment)
Agency agreements	n/a	
A summary of services for which the council is entitled to recover a fee, together with those fees (e.g. burial fees)	Website Hard copy	Free 10p/sheet

Contact Details

Matthew Sheehan, Town Clerk
Cleobury Country Centre
Love Lane
Cleobury Mortimer
Worcestershire
DY14 8PE
Tel 01299 271154

Schedule of Charges

Information can be inspected, by appointment at the Council Offices free of charge.

A detailed search of records (for example the Burials Register or the Council Minutes) is subject to a charge of £10 per search.

Type of charge	Description	Basis of charge
Disbursement cost	Photocopying @ 10p per sheet black and white	Actual cost
	Photocopying @25p per sheet colour	
	Postage	Actual cost of Royal Mail standard 2 nd class

REVIEW

The effectiveness of this Model Publication Scheme and associated arrangements will be reviewed every four years.

Next review June 2025.