

REMENHAM PARISH COUNCIL (RPC)

DATA PROTECTION POLICY*

The Data Protection Act

The Data Protection Act 1998 sets out high standards for the handling of personal information and protecting individuals' rights for privacy. It also regulates how personal information can be collected, handled and used. The Data Protection Act applies to anyone holding personal information about people electronically or on paper.

As a local authority RPC has a number of procedures in place to ensure that it complies with The Data Protection Act 1998 when holding personal information. Currently, RPC has notified the Information Commissioner that it holds no personal data on individuals other than the following:

Councillors,

The Clerk,

those undertaking for it website management,

those undertaking litter picking and

for a maximum of 1 month of those residents who opt-in in a GDPR context to

comment on RPC-surveys, which produce anonymized summaries for the next

RPC meeting at which point all such data is deleted.

Were this to change then we would inform residents and ICO.

In dealing with such personal data RPC and its Councillors will ensure that data are:

- **processed fairly and lawfully**
- **processed for specified purposes only**
- **relevant to what it is needed for**
- **accurate and kept up to date**
- **not kept longer than it is needed**
- **processed in accordance with the rights of individuals and**
- **kept securely**

Freedom of Information Act (FOI)

The Freedom of Information Act 2000 provides public access to information held by public authorities. It does this in two ways:

- **public authorities are obliged to publish certain information about their activities;**
and
- **members of the public are entitled to request information from public authorities.**

The Act covers any recorded information that is held by a public authority in England, Wales and Northern Ireland, and by UK-wide public authorities based in Scotland. This includes printed documents, computer files, letters, emails, photographs, and sound or video recordings.

The Act does not give people access to their own personal data as this is covered under Data Protection Act 1998.

Environmental Information Regulations (EIR)

The Environmental Information Regulations 2004 provide public access to environmental information held by public authorities. The Regulations do this in two ways:

- **public authorities must make environmental information available proactively;**
- **members of the public are entitled to request environmental information from public authorities.**

The Regulations cover any recorded information held by public authorities in England, Wales and Northern Ireland. Environmental information held by Scottish public authorities is covered by the Environmental Information (Scotland) Regulations 2004.

The Regulations apply only to the environmental information held by public authorities. The Freedom of Information Act gives people access to most other types of information held by public authorities.

The Regulations and the Freedom of Information Act do not give people access to their own personal data (information about themselves), such as their health records or credit reference files. Individuals have a right of access to information held about them under the Data Protection Act 1998.

Storing and accessing data

RPC will recognise its responsibility to be open with Parishioners were it to be taking personal details from them. The Councillors and Clerk would at all times be honest about why they might want a particular piece of personal information. If, for example, a member of the public gives their telephone number to the Clerk or a member of the Parish Council, this will only be used for the purpose it has been given and will not be disclosed to anyone else.

RPC will hold any personal information about an individual (e.g. their addresses and telephone numbers) in a secure location at the home of the Parish Clerk and is not available for public access. All electronic data stored by RPC is password protected. Once data are not needed anymore, if it is out of date or has served its use, it will be deleted or disposed of securely.

RPC is aware that people have the right to access any personal information that is held about them. If a person requests to see any data that is being held about them:

- **they must be sent all the personal information that is being held about them;**
- **there must be an explanation for why it has been stored;**
- **there must be a list of who have seen it;**
- **it must be sent within 40 days.**

A fee to cover photocopying and postage charges will be charged to the person requesting the personal information. This fee will be agreed by the Parish Council and amended in line with inflation from time to time. Currently this fee must not exceed £10.

Disclosure of personal information

If a Councillor needs to access personal information to help carry out their duties, this is acceptable. They are only able to access as much personal information as necessary and it should only be used for that specific purpose. However, before they access any sensitive

personal information about a person, they would need consent to do this from the Parish Clerk. Data should never be used for political reasons unless the data subjects have consented.

Reporting on requests

RPC will maintain a Disclosure Log which will be reported annually. The Log will include how many requests for information have been received under which item of legislation (DPA, FOI or EIR), whether the statutory response timescales have been complied with and the sector the request had come from (business, local MPs, members of the public within the district, or members of the public outside the district).

Confidentiality

RPC Councillors and Clerk are aware that when complaints or queries are made, they must remain confidential unless the subject gives permission otherwise. When handling personal data, this must also remain confidential.

This policy was adopted by RPC on 12th June 2018 and will be reviewed in 2020 or when an update is received from the Information Commissioner, if sooner.

COMMUNICATION POLICY*

Introduction

Each RPC Parish Councillor has a duty to represent without bias the interests of the whole community. They will always try and do their best and are available to help parishioners with regard to matters relating to the Parish of Remenham.

Parish Councillors may be contacted via the Clerk (clerk4REMPC@gmail.com) or using their RPC email addresses that can be found on the RP/RPC website.

If it is felt by the resident that the matter is important, then a letter or email to the Parish Clerk (Paul Sermon) will ensure that it is dealt with in a timely and professional manner (also see the Correspondence section below).

It is RPC's intention to meet the timescales detailed below but there could be occasions when this is not possible. When this happens RPC will review their procedures and where necessary make changes to the policy or procedures.

RPC Aims

- To establish clear, easy to use channels of communication between RPC and Parishioners, and vice versa.
- To provide information on important matters in a timely manner so as to facilitate and encourage informed comment from interested individuals and groups. On occasions this is via a survey into which residents may opt-in in a GDPR context; any anonymized outcome would be presented at the next RPC meeting and all associated personal data would then be deleted within 1 month.

RPC Meetings

RPC meets on the second Tuesday of every month (except August). RPC will normally meet in the Parish Hall, Remenham Lane from 8.00pm, and will advertise any change. Public participation is encouraged on any matter on the Agenda (apart from any reserve business).

Annual Parish Meeting (APM)

The Annual Parish Meeting is convened by the Chairman of RPC and is generally held on the second Tuesday of May each year at 8pm in the Parish hall. It is preceded by the Annual Meeting of the Parish Council. The APM is intended to provide parishioners with a summary of the activities of the Parish Council over the previous year and the opportunity to debate local issues and celebrate local events and activities.

Notice Board

The following items will be displayed on the RPC noticeboard outside the Parish Hall in Remenham Lane:

- Date and Agenda of the next RPC meeting at least 3 working days before that meeting
- Contact details for the Clerk
- Draft RPC minutes within 3 weeks of that meeting and
- Details of any forthcoming elections or invitations to apply for co-opting or notification of the opportunity to view accounts.

This information displayed on the RPC Notice Board is kept up-to-date.

Website

The following items will be displayed on the RP/RPC website (www.remenhamparish.org.uk):

- Dates of all meetings in the next year
- The Agenda, associated papers and PowerPoint (PPT) presentations for the next RPC meeting at least 3 working days before that meeting
- Contact details for the Clerk
- Draft RPC minutes within 1 month of the meeting
- Approved/signed minutes as soon as possible after the next approving meeting
- Special interests of Councillors
- Details of any forthcoming elections or invitations to apply for co-opting.

In order to comply with the Transparency Code for Smaller Authorities, the Clerk for RPC arranges for the annual publication of the following documents no later than 1 July each year:

- All items of expenditure and income
- End of year accounts
- Annual governance statement
- Internal audit report
- List of councillor or member responsibilities
- Minutes, agendas and meeting papers of formal meetings.

The Parish Clerk will ensure that the Parish Council email address (clerk4REMPC@gmail.com) is publicised.

Correspondence

All correspondence relating to the Parish should be addressed to the Parish Clerk in the first instance.

All correspondence to the Parish Clerk will be acknowledged within one week of receipt if at all possible. If email is used then an acknowledgment will be sent via email.

Councillors will be notified of correspondence, but the addressee will not be named on minutes of meetings unless requested. Anonymous correspondence in any form will be recorded as received but not responded to.

Email should be thought of in the same way as a letter. A subject line, the sender's name and the content should be in the main body of the email, not as an attachment. Attachments will not be opened unless the Clerk has prior knowledge of the subject. The Council regrets that, for reasons of computer security and virus protection, anonymous emails and those with no subject in the title will not be opened or actioned.

A parishioner may raise any issue directly with the Parish Clerk or any Councillor. If a satisfactory answer cannot be given immediately, the issue may be placed on the Agenda for the attention of the full Council.

The Clerk will acknowledge all Freedom of Information requests within seven working days and will reply fully within 20 working days of receipt of the request. If this is not possible, a further holding letter/email will be sent with an expected completion date.

Adopted by RPC on 12th June 2018 (and to be reviewed in 2020)

Document Retention and Disposal Policy and Procedure*

Retention of Documents Policy

RPC recognises that the efficient management of its records is necessary to comply with its legal and regulatory obligations and to contribute to the effective overall management of the Parish Council.

This document provides the policy framework through which this effective management can be achieved and audited. It covers:

Scope of the policy

This policy applies to all records created, received or maintained by RPC in the course of carrying out its functions. Records are defined as all those documents which facilitate the business carried out by RPC and which are thereafter retained (for a set period) to provide evidence of its transactions or activities. These records may be created, received or maintained in hard copy or electronically. A small percentage of the RPC's records may in the future be selected for permanent preservation as part of the Council's archives and for historical research.

Responsibilities

RPC has a responsibility to maintain its records and record management systems in accordance with the regulatory environment. The person with overall responsibility for the implementation

of this policy is The Clerk to RPC (Paul Sermon), and he is required to manage RPC's records in such a way as to promote compliance with this policy so that information will be retrieved easily, appropriately and in a timely manner.

Retention Schedule

Introduction

A Retention Schedule is a list of records that need to be kept by RPC for a specific length of time.

This schedule contains recommended periods of retention for records created and maintained by RPC and refers to all information regardless of the media in which it is stored, such as manual files, photographs, electronic files, tapes or microfiche.

The aim of the Retention Schedule is to provide a consistent approach to the way the Council handles its records and provide a clear set of guidelines.

A Retention Schedule serves the purpose of identifying records that may be worth preserving permanently as a part of a local authority archive as well as preventing the premature destruction of records that need to be retained for a specific legal, financial or statutory period.

This Retention Schedule details the function of each record, the type of records that may fall within this function and the length of time RPC should hold the record before taking disposal or archive action.

Many retention periods are determined by statute.

RPC aims to keep accurate and timely records for the appropriate period of time, making sure that obsolete records are securely disposed of in an appropriate manner.

Retention of Documents Procedure

Under the Freedom of Information Act 2000, RPC is required to maintain a retention schedule listing the record series which it creates in the course of its business. The retention schedule lays down the length of time which the record needs to be retained and the action which should be taken when it is of no further administrative use.

The Clerk to RPC will manage the current record keeping systems using the retention schedule and to take account of the different retention periods when creating new record keeping systems. This retention schedule refers to record series regardless of the media in which they are stored.

Document	Minimum	Retention Reason
Minutes	Indefinite	Archive
Annual Accounts	Indefinite	Archive
Annual Return	Indefinite	Archive
Bank statements	7 years	Audit/management
Cheque book stubs	Last completed audit	Management
Paying in books	Last completed audit	Management
Quotations	7 years	Audit

Document	Minimum	Retention Reason
Paid invoices	7 years	Audit/VAT
VAT records	7 years	Audit/VAT
Insurance policies	Whilst valid	Audit
Cert of public liability	40 years	Audit/legal
Assets register	Indefinite	Audit
Members register of interests'	Term of office + 1	Management
Complaints	1 year	Management
General information	6 months	Management
Correspondence & e-mails	6 months	Management

Planning Applications

All planning applications and relevant decision notices are available at the WBC website and office. All RPC comments and recommendations are to be found in meeting minutes and the WBC website.

Disposal procedures

All documents that are no longer required for administrative reasons are shredded if confidential.

This Policy was adopted by RPC at its 12th June 2018 meeting and will be reviewed in 2020 or sooner if legislation dictates.

Freedom of Information (Fol) Scheme*

Freedom of Information Act 2000

This Publication Scheme below was adopted by RPC on 12th June 2018 and is operational from that date.

Introduction

This model publication scheme has been prepared and approved by the Information Commissioner. It has been adopted without modification by RPC and does not require further approval, being valid until further notice.

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 RPC for routinely published material that is requested as a hardcopy (i.e. copying and postage) 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.

Written Requests

Information held by RPC 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.

12th June 2018

Information available from Remenham Parish Council (RPC) under the Model Publication Scheme

Information to be published	How the information can be obtained
Class1 - Who's who on RPC; Contact details for Parish Clerk and Council members (named contacts where possible with telephone number and email address (if used))	Website/hard copy on noticeboard
Class 2 – RPC's financial information relating to projected and actual income and expenditure, procurement, contracts and financial audit) for current and previous years; Annual return form and report by internal-external auditor; Finalised budget; Precept; Standing Orders and Financial Regulations; Grants given and received; List of current contracts awarded and value of contract; Expenses.	Website/hard copy on noticeboard
Class 3 – RPC's priorities; Strategies and plans; Parish Plan; Annual Report to Parish Meeting;	Website/hard copy on noticeboard
Class 4 – Decision making; Records of decisions; Timetable of meetings; Agendas of meetings; Minutes of meetings; Responses to consultation; Responses to planning applications; Bye-laws	Website/hard copy on noticeboard
Class 5 – Our policies and procedures; Current procedures; Conduct of council business; Policies and procedures for the provision of services and about the employment of staff; Equality and diversity policy; Health and safety policy; Policies and procedures for handling requests for information; Records retention, destruction and archiving; Data protection policies	Website/hard copy on noticeboard
Class 6 – Lists and Registers; Assets Register (Bench, Noticeboard and Dog waste bin); Disclosure log (indicating the information that has been provided in response to requests); Register of members' interests.	Website/hard copy on noticeboard
Class 7 – Services RPC and WBC offer	Website/hard copy on noticeboard
Additional Information Emergency Procedures	Website/hard copy on noticeboard

All requests for hard copies should be made by e-mail or in writing to the:
Parish Clerk, Paul Sermon
PO Box 4748, Henley-on-Thames, RG9 9DH
01491412908 or
clerk4REMPC@gmail.com
www.remenhamparish.org.uk

DESCRIPTION	BASIS OF CHARGE
Photocopying @ 10p per sheet (black & white)	Actual cost *
Photocopying @ 20p per sheet (colour)	Actual cost
Postage	Actual cost of Royal Mail standard 2 nd class
Website downloads	free

Approved by RPC on 12th June 2018 (and to be reviewed in 2020).

Privacy Notice *

This sets out the type of information we collect (or are supplied with). It tells you how the information is held, who we share it with and how it is used. There are contact details for queries about your personal information. All personal data collected (or supplied) will be treated in accordance with current data protection laws in the UK.

What information do we collect and what information are we supplied with?

To enable it to function RPC currently keeps personal data on
Councillors,
The Clerk,
those undertaking for it website management,
those undertaking litter picking and
for a maximum of 1 month of those residents who opt-in in a GDPR context to
comment on RPC-surveys, which produce anonymized summaries for the next
RPC meeting at which point all such data is deleted.

Were this to change then we would inform residents and ICO. RPC does not otherwise collect or store any personal information. RPC does not process or sell any personal data.

Please make any comments, requests or complaints to:

The Clerk to RPC (Paul Sermon), PO Box 4748, Henley-on-Thames, RG9 9DH or 01491412908 or clerk4REMPC@gmail.com.

If you are dissatisfied with the handling of your request or complaint, you have a right to appeal to the Information Commissioner. There is no charge for making an appeal. Contact

details are:

The Information Commissioner's Office
Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF
Telephone: 01625 545745 or 0303 123 1113 (local rate) or
email: casework@ico.gov.uk

This Privacy Notice was adopted by RPC at a regular meeting on 12th June 2018 and will be reviewed again in 2020 or earlier if legislation changes.

REMENHAM PARISH COUNCIL (RPC)

DISCLOSURE LOG*

Date Received	Sector Request From	Request	Response	Date of Response	Category of Request		
					Data Protection	Freedom of Information	Environmental Information Regulations

In the **Sector Request From** column one might select from: business, local MP, members of the public within Remenham Parish, or members of the public outside Remenham.

Freedom of Information (Fol) requests will be responded to within 20 working days (unless one or more exemptions apply)

Data Protection Act Requests should be responded to within 40 calendar days (but preferably sooner)

Environmental Information Regulations should be responded to within 20 working days

*possibly to be amended in the light of BALC-DPO advice on 11th Sept 2018