

# Shawbury Parish Council

## INFORMATION & DATA PROTECTION POLICY

This policy was reviewed and approved by the Council at its meeting on **date**

### Introduction

In order to conduct its business, services and duties, Shawbury Parish Council processes a wide range of data, relating to its own operations and some which it handles on behalf of partners. In broad terms, this data can be classified as:

- Data shared in the public arena about the services it offers, its mode of operations and other information it is required to make available to the public.
- Confidential information and data not yet in the public arena such as ideas or policies that are being worked up.
- Confidential information about other organisations because of commercial sensitivity.
- Personal data concerning its current, past and potential employees, Councillors, and volunteers.
- Personal data concerning individuals who contact it for information, to access its services or facilities or to make a complaint.

Shawbury Parish Council will adopt procedures and manage responsibly, all data which it handles and will respect the confidentiality of both its own data and that belonging to partner organisations and members of the public. In some cases, it will have contractual obligations towards confidential data, but will also have specific legal responsibilities for personal and sensitive information under data protection legislation.

### Data Sharing

The Council will periodically review and revise this policy in the light of experience, comments from data subjects and guidance from the Information Commissioners Office. The Council will be as transparent as possible about its operations and will work closely with public, community and voluntary organisations. In the case of all information which is not personal or confidential, it will be prepared to make it available to partners and members of the Parish's communities. Details of information which is routinely available is contained in the Council's Publication Scheme which is based on the statutory model publication scheme for local councils.

### Protecting Confidential or Sensitive Information

The Council recognises it must at times, keep and process sensitive and personal information about both employees and the public, it has therefore adopted this policy not only to meet its legal obligations but to ensure high standards.

The General Data Protection Regulation (GDPR) which became law on 25 May 2018 and will like the Data Protection Act 1998 before them, seek to strike a balance between the rights of individuals and the sometimes, competing interests of those such as the Council with legitimate reasons for using personal information.

### The policy is based on the premise that Personal Data must be:

- Processed fairly, lawfully and in a transparent manner in relation to the data subject.
- Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.
- Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
- Accurate and, where necessary, kept up to date.
- Kept in a form that permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed.

- Processed in a manner that ensures appropriate security of the personal data including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

### Data Protection Terminology

**Data subject** - means the person whose personal data is being processed.

That may be an employee, prospective employee, associate or prospective associate of Shawbury Parish Council or someone transacting with it in some way, or an employee, Member or volunteer with one of our clients, or persons transacting or contracting with one of our clients when we process data for them.

**Personal data** - means any information relating to a natural person or data subject that can be used directly or indirectly to identify the person.

It can be anything from a name, a photo, and an address, date of birth, an email address, bank details, and posts on social networking sites or a computer IP address.

**Sensitive personal data** - includes information about racial or ethnic origin, political opinions, and religious or other beliefs, trade union membership, medical information, sexual orientation, genetic and biometric data or information related to offences or alleged offences where it is used to uniquely identify an individual.

**Data controller** - means a person who (either alone or jointly or in common with other persons) (e.g. Town Council, employer, council) determines the purposes for which and the manner in which any personal data is to be processed.

**Data processor** - in relation to personal data, means any person (other than an employee of the data controller) who processes the data on behalf of the data controller.

**Processing information or data** - means obtaining, recording or holding the information or data or carrying out any operation or set of operations on the information or data, including:

- organising, adapting or altering it
- retrieving, consulting or using the information or data
- disclosing the information or data by transmission, dissemination or otherwise making it available
- aligning, combining, blocking, erasing or destroying the information or data. regardless of the technology used.

### Personal Data

The Council processes **personal data** in order to:

- Fulfil its duties as an employer by complying with the terms of contracts of employment, safeguarding the employee and maintaining information required by law.
- Pursue the legitimate interests of its business and its duties as a public body, by fulfilling contractual terms with other organisations, and maintaining information required by law
- Monitor its activities including the equality and diversity of these activities
- Fulfil its duties in operating the business premises including security
- Assist regulatory and law enforcement agencies

- Process information including the recording and updating details about its Councillors, employees, partners and volunteers.
- Process information including the recording and updating details about individuals who contact it for information, or to access a service, or make a complaint.
- Undertake surveys, censuses and questionnaires to fulfil the objectives and purposes of the Council.
- Undertake research, audit and quality improvement work to fulfil its objects and purposes.
- Carry out Council administration.

Where appropriate and governed by necessary safeguards we may carry out the above processing jointly with other appropriate bodies from time to time.

### Conditions under which personal information is considered to be fairly processed

- The individual has consented to the processing
- Processing is necessary for the performance of a contract or agreement with the individual
- Processing is required under a legal obligation
- Processing is necessary to protect the vital interests of the individual
- Processing is necessary to carry out public functions
- Processing is necessary in order to pursue the legitimate interests of the data controller or third parties.

### Sensitive Information

Particular attention is paid to the processing of any **sensitive personal information** and the Council will ensure that at least one of the following conditions is met:

- Explicit consent of the individual
- Required by law to process the data for employment purposes
- A requirement in order to protect the vital interests of the individual or another person

### Responsibility for protecting personal data

The Council as a corporate body has ultimate responsibility for ensuring compliance with the Data Protection legislation and has delegated this responsibility day to day to the clerk.

Email: [clerk@shawbury-pc.gov.uk](mailto:clerk@shawbury-pc.gov.uk)

Correspondence: The Clerk, Westmead, 2 Tilley Road, Wem, Shropshire, SY4 5HA

### Diversity Monitoring

The Council monitors the diversity of its employees, and Councillors, in order to ensure that there is no inappropriate or unlawful discrimination in the way it conducts its activities. It undertakes similar data handling in respect of prospective employees. This data will always be treated as confidential. It will only be accessed by authorised individuals within the Council and will not be disclosed to any other bodies or individuals.

Diversity information will never be used as selection criteria and will not be made available to others involved in the recruitment process. Anonymised data derived from diversity monitoring will be used for monitoring purposes and may be published and passed to other bodies.

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

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

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

### Information provided to us

The information provided (personal information such as name, address, email address, phone number) will be processed and stored so that it is possible for us to contact, respond to or conduct the transaction requested by the individual. By transacting with the Council, individuals are deemed to be giving consent for their personal data provided to be used and transferred in accordance with this policy, however where ever possible specific written consent will be sought. It is the responsibility of those individuals to ensure that the Council is able to keep their personal data accurate and up-to-date. The personal information will be not shared or provided to any other third party or be used for any purpose other than that for which it was provided.

### The Council's Right to Process Information

General Data Protection Regulations (and Data Protection Act) Article 6 (1) (a) (b) and (e) state that processing may be undertaken if it is with the consent of the data subject, or if processing is necessary for compliance with a legal obligation or necessary for the legitimate interests of the Council.

### Information Security

The Council takes care 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 policies.

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

### Children

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

### Rights of a Data Subject

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

1. **Access to Information:** an individual has the right to request access to the information we have on them. They can do this by contacting our Parish Clerk.
2. **Information Correction:** If they believe that the information we have about them is incorrect, they may contact us so that our data is accurate. Please contact: Parish Clerk.
3. **Information Deletion:** If the individual wishes the Council to delete the information about them, they can do so by contacting the Parish Clerk.
4. **Right to Object:** If an individual believes their data is not being processed for the purpose it has been collected for, they may object by contacting the Parish Clerk.

The Council does not use automated decision making or profiling of individual personal data.

**Complaints:** If an individual has a complaint regarding the way their personal data has been processed, they may make a complaint to the Parish Clerk, or the Information Commissioners Office [casework@ico.org.uk](mailto:casework@ico.org.uk) Tel: 0303 123 1113.

### **Making Information Available**

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

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

All formal meetings of Council and its committees are subject to statutory notice being given on notice boards, the Website and sent to the local media. The Council publishes an annual programme each year. All formal meetings are open to the public and press and reports to those meetings and relevant background papers are available on the website for the public to see.

The Council welcomes public participation and has a public participation session on each Council meeting. Details can be seen in the Council's Standing Orders, which are available on its Website.

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

The Openness of Local Government Bodies Regulations 2014 requires written records to be made of certain decisions taken by officers under delegated powers. These are not routine operational and administrative decisions but would include urgent action taken after consultation with the Chairman, such as responding to a planning application in advance of Council. In other words, decisions which would have been made by Council or committee had the delegation not been in place. The 2014 Regulations also amend the Public Bodies (Admission to Meetings) Act 1960 to allow the public or press to film, photograph or make an audio recording of council and committee meetings normally open to the public. The Council will where possible facilitate such recording unless it is being disruptive. It will also take steps to ensure that children, the vulnerable and members of the public who object to being filmed are protected without undermining the broader purpose of the meeting.

### **Disclosure Information**

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

## Data Transparency

The Council has resolved to act in accordance with the Code of Recommended Practice for Local Authorities on Data Transparency (September 2011). This sets out the key principles for local authorities in creating greater transparency through the publication of public data and is intended to help them meet obligations of the legislative framework concerning information. 'Public data' means the objective, factual data on which policy decisions are based and on which public services are assessed, or which is collected or generated in the course of public service delivery.

The Code will therefore underpin the Council's decisions on the release of public data and ensure it is proactive in pursuing higher standards and responding to best practice as it develops.

The principles of the Code are:

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

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

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

Government has also issued a further Code of Recommended Practice on Transparency, compliance of which is compulsory for parish councils with turnover (gross income or gross expenditure) not exceeding £25,000 per annum. These councils are exempt from the requirement to have an external audit but must publish the following on its website:

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

Shawbury Parish Council does not fall into this category, but has chosen to publish the information listed above.

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|------------------|----------------------------------|
| Adopted          | March 2026                       |
| Review Frequency | Four-Yearly at Annual PC Meeting |
| Next Review due  | May 2030                         |

# Shawbury Parish Council

## GDPR INFORMATION AUDIT

Reviewed March 2026

### This Document is designed to:

1. Identify the data held and/or received by Shawbury Parish Council.
2. Identify potential risks regarding Data breaches.
3. Provide the basis for self-assessment of compliance with GDPR legislation.
4. Identify actions required to be compliant or mitigate risk.

### Lawful Basis for Holding Data

|                               |  |
|-------------------------------|--|
| <b>Consent</b>                | The data subject has given clear consent or their personal data to be processed for a specific purpose.  |
| <b>Contract</b>               | Data processing is necessary for a contract held with the individual or because they have asked you to take specific steps before entering into a contract.  |
| <b>Legal Obligation</b>       | Data processing is necessary for you to comply with the law.   |
| <b>Vital Interest</b>         | Data processing is necessary to protect someone's life.  |
| <b>Public Interest / task</b> | the processing is necessary for you to perform a task in the public interest or for your official functions, and the task or function has a clear basis in law.  |
| <b>Legitimate Interest</b>    | the processing is necessary for your legitimate interests or the legitimate interests of a third party unless there is a good reason to protect the individual's personal data which overrides those legitimate interests. (This cannot apply if you are a public authority processing data to perform your official tasks.) |

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|------------------|----------------------------------|
| Adopted          | March 2026                       |
| Review Frequency | Four-Yearly at Annual PC Meeting |
| Next Review due  | May 2030                         |

| SUBJECT                  | Nature / purpose of processing | Type of Data / where is it from  | Format held and how long data held                    | Who is the Data Subject                                | Lawful Basis for holding data               | Risks and security controls in place   |
|--------------------------|--------------------------------|--|---|--|---|--|
| <b>Staff</b>             |                                |  |   |  |   |  |
| Staff personal details   | Payroll / HR Functions         | Employment contracts<br>Leave/ sickness records<br>Grievance/ discipline Records<br>Accident/ injury record<br>Pension<br>PAYE<br>Bank Details<br>Job applications | Hard Copy.<br>Electronic files                        | Staff anyone who has previously applied for employment | Contract / Public Task/<br>Legal Obligation | <b>Risk</b><br>Emails being forwarded to wrong email address<br><b>Security Controls</b><br>No hard copies. Password protection.<br>Computer records encrypted protected<br>Information retained as per document retention policy<br>Staff Trained in Data Protection<br>Data only shared with HMRC, pension provider submitted using password protected software.<br>Staff consent form distributed May 2018. |
| Ex staff                 | In case of claim               | Contact details  | Hard copy<br>electronic files as per retention policy |  | Contract / Legal Obligation                 | <b>Risk</b> - Staff passing on details to councillors outside bodies for non-staffing related matters.<br><b>Security Controls</b><br>No hard copies held. Laptop password protected.<br>Information retained as per document retention policy<br>Staff Trained in Data Protection   |
| <b>Councillors</b>       |                                |  |   |  |   |  |
| Personal Contact Details | Democracy/ HR                  | Emails, addresses<br>bank details supplied by councillors  | Hard Copy.<br>Electronic files                        | Councillor   | Public Task                                 | Contact info a statutory requirement to publicise.<br><b>Risk</b> - Staff passing on details to people and organisations outside of the council<br><b>Security Controls</b><br>No hard copies held. Laptop password protected. Information retained as per document retention policy<br>Staff Trained in Data Protection   |

| SUBJECT                                     | Nature / purpose of processing                                     | Type of Data / where is it from  | Format held and how long data held                        | Who is the Data Subject | Lawful Basis for holding data    | Risks and security controls in place   |
|---|--|--|---|-------------------------|----------------------------------|--|
|   |  |  |   |                         |                                  | Consent form and privacy policy provided to all councillors May 2018   |
| Declarations of interest                    | Democracy  | Personal Councillor information  | Electronic held by Shropshire Council                     | Councillor              | Public Task                      | No hard copies held. Data managed by Shropshire Council.   |
| Registers of interest                       | Democracy  | Signed form  | Hard copy   | Councillor and partner  | Legislative requirement          | No hard copies held. Laptop password protected.  |
| <b>Contractors / Suppliers</b>              |  |  |   |                         |                                  |  |
| Contractors / Suppliers                     | Dealing with contractors requesting quotes                         | Contact details<br>Invoices<br>Orders<br>Quotes<br>Bank Details<br>Insurance<br>References | Electronic / Paper<br>Removed as per retention policy r   | Contractors / suppliers | Public task                      | <b>Risk</b> Passing on contact details to those outside the organisation or using it for another purpose<br><b>Security</b> Addresses not be passed on containing personal data without first seeking the consent.   |
| <b>Residents</b>                            |  |  |   |                         |                                  |  |
| Electoral Roll                              | In order to identify electors for voting in annual parish meetings | Names of electors and their addresses, marital status<br>From principal authority          | Electronic  | Parish residents        | Legal obligation                 | <b>Risk</b> - Staff passing on details to public, councillors, outside bodies The list should not be photocopied or reproduced in any form. However, anyone can view the list and may write down the data.<br><b>Security</b><br>No hard copies held. Laptop password protected. |
| Previous Subject Access Request information | Democracy  | Name and contact information of requestor  | Hard copy / electronic<br>Removed as per retention policy | Complainant             | Legal Obligation/<br>Public task | <b>Risk</b> - Staff passing on details to public, councillors, outside bodies choose)<br><b>Security</b><br>No hard copies held. Laptop password protected.<br>Council email provides details of privacy notice  |
| Complaints                                  | Democracy  | Name and contact information of complainant  | Hard copy / electronic<br>Removed as per retention        | Complainant             | Legal Obligation/<br>Public task | <b>Risk</b> - Staff passing on details to public, councillors, outside bodies<br><b>Security</b><br>No hard copies held. Laptop password   |

| SUBJECT                      | Nature / purpose of processing                           | Type of Data / where is it from  | Format held and how long data held                                 | Who is the Data Subject | Lawful Basis for holding data   | Risks and security controls in place   |
|------------------------------|--|--|--|-------------------------|---|--|
|                              |  |  | policy   |                         |   | protected. Council email provides details of privacy notice  |
| Emails                       | Dealing with business related matters/ Public enquiries/ | Public Contractors<br>Partner Organisations<br>Other Councils              | electronic   |                         |   | <b>Risk</b> Passing on contact details provided for the sole purpose of addressing a particular issue to those outside the organisation or using it for another purpose.<br><b>Security</b><br>Staff trained in data handling in that Emails should not be passed on containing personal data without first seeking the consent of the sender.<br>No hard copies held. Laptop password protected. Council email provides details of privacy notice |
| Previous FOI requests        | Democracy  | Name and contact information of requestor                                  | Hard copy / electronic<br>Removed as per retention policy          | FOI requestor           | Legal Obligation/<br>Public task                                      | <b>Risk</b> - Staff passing on details to public, councillors, outside bodies<br><b>Security</b><br>No hard copies held. Laptop password protected.  |
| <b>Community Groups</b>      |  |  |  |                         |   |  |
| Grant applicants             | Grant applications                                       | Application forms  | Paper copies, destroyed as per data retention policy               | Applicants for grants   | Public task   | <b>Risk</b> - Staff and councillors passing on details to public, outside bodies<br><b>Security</b><br>No hard copies held. Laptop password protected.   |
| <b>Planning Applications</b> |  |  |  |                         |   |  |
|                              | Consultations on planning applications                   | Name and contact information of applicants received from planning register | On website (direct feed from Shropshire Council's planning portal) | Applicant               | Legal Obligation as consultee on planning applications<br>Public task | No hard copies retained. All information is stored on Shropshire Council Planning Portal.  |
| <b>Property</b>              |  |  |  |                         |   |  |

| SUBJECT                 | Nature / purpose of processing              | Type of Data / where is it from                                     | Format held and how long data held                               | Who is the Data Subject                                    | Lawful Basis for holding data | Risks and security controls in place   |
|-------------------------|---|---|--|--|-------------------------------|--|
|                         | Leases/ Licences Service Level Agreements   | Name and contact information of licensee/ leaseholder               | Hard Copy held indefinitely or as per data retention             | Leaseholder / licensee                                     | contract                      | <b>Risk</b> Passing on contact details to those outside the organisation or using it for another purpose<br><b>Security</b> Addresses not be passed on containing personal data without first seeking the consent.<br>Hard copies held in locked cabinet |
| <b>Local Connection</b> |   |   |  |  |                               |  |
| Applicants              | Verification as per local connection policy | Supplied by Housing Association – details required for verification | Until applicant verified. Destroyed as per data retention policy | Applicant for a property which requires a local connection | Public task                   | <b>Risk</b> Passing on contact details to those outside the organisation or using it for another purpose<br><b>Security</b><br>No hard copies kept. Computer is password protected.  |

Additional Notes:

1. Electronic data is regularly backed up a memory stick to mitigate the risk of a catastrophic failure and the loss of operationally information.
2. The Council does not knowingly collect any overly sensitive data such as children's or vulnerable adults' records, undertake covert surveillance or data that if a breach was to occur is likely to result in serious injury; nor does it seek to use personal data it receives for commercial gain (e.g. to sell another service).

# Shawbury Parish Council

## PRIVACY POLICY

Reviewed March 2026

### Introduction

This Policy was adopted by the Parish Council in order to comply with the requirements of the General Data Protection Regulations (GDPR), in force on 25 May 2018.

### 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 Shawbury Parish Council which is the data controller for your data. The Council’s address is:

c/o Parish Clerk, Shawbury Parish Council (see [https://shawbury-pc.gov.uk/contact\\_us/](https://shawbury-pc.gov.uk/contact_us/) for valid contact details)

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

- Names, titles, 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 a council hall, financial identifiers such as bank account numbers, payment card numbers, payment/transaction identifiers, policy numbers, and claim numbers;

### The Parish 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.
- Be 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
- 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 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 (by email, post or appropriate social media) 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.

### **What is the legal basis for processing your personal data?**

The council is a public authority and has certain powers and duties (e.g. raise precept, represent views of parishioners, manage assets). 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.

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. The Council will not share any data with third parties without your express consent.

### **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.

## 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 and setting out the relevant purposes and processing conditions. Where and whenever necessary, we will seek your prior consent to the new processing.

## Changes to this policy

We keep this Privacy Policy under regular review. Any updates to this policy will be placed on the Parish Council web pages ( [www.Shawbury-pc.gov.uk](http://www.Shawbury-pc.gov.uk)).

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.

[clerk@shawbury-pc.gov.uk](mailto:clerk@shawbury-pc.gov.uk)

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| Adopted          | March 2026                       |
| Review Frequency | Four-Yearly at Annual PC Meeting |
| Next Review due  | May 2030                         |

# Shawbury Parish Council

## PRIVACY NOTICE - BASIC

Reviewed March 2026

Shawbury Parish Council is collecting/managing your personal data under the Data Protection Act 1998 and the General Data Protection Regulations 2018. Your information will only be processed by the Council and will not be shared with any third parties. To find out more about our privacy arrangements please access the Council's website – [www.shawbury-pc.gov.uk](http://www.shawbury-pc.gov.uk) where our detailed Privacy Notice and Privacy Policy can be viewed.

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| Next Review due  | May 2030                         |

# Shawbury Parish Council

## PRIVACY NOTICE POLICY

Reviewed November 2024

### 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 Shawbury Parish Council which is the data controller for your data.

Other data controllers the council works with:

- Shropshire Council
- Community groups
- Charities
- Other not for profit entities
- Contractors

We may need to share with them your personal data (which we hold) 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 means 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(s).

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

### 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 Parish Council will **not** hold any sensitive or special category data (eg criminal convictions, health, political beliefs etc.) medication/treatment received, political beliefs, trade union affiliation, genetic data, biometric data, data concerning and sexual life or 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, 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.

### **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

- The Parish Council will not share any data with third parties without your express consent.

## 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.

### **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.

### **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.

### **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).

### **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.

### **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.

**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).

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

- You can contact the Information Commissioners Office on 0303 123 1113 or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF.

**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.

**Changes to this notice**

We keep this Privacy Notice under regular review and we will place any updates on our website. This Notice was last updated in July 2018.

**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:

[www.shawbury-pc.gov.uk](http://www.shawbury-pc.gov.uk) or email [clerk@shawbury-pc.gov.uk](mailto:clerk@shawbury-pc.gov.uk)

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| Adopted          | March 2026                       |
| Review Frequency | Four-Yearly at Annual PC Meeting |
| Next Review due  | May 2030                         |

# Shawbury Parish Council

## SUBJECT ACCESS POLICY

Reviewed March 2026

### Background

This policy was adopted by the Shawbury Parish Council in order to comply with the requirements of the General Data Protection Regulations (GDPR), in force on 25 May 2018.

Data subjects (individuals) have the right to access personal data we hold on them. Details are set out in the Privacy Notice on the Council's website [www.shawbury-pc.gov.uk](http://www.shawbury-pc.gov.uk)

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

- Responsibilities (who, what)
- Timing
- Changes to data
- 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.

### Upon receipt of a Subject Access Request

- (a) The data subject (individual) will be informed who at the Council to contact, the Data Controller, particularly the Parish Clerk
- (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.

## Responding to a SAR

- (i) The Council will respond to a SAR within one month after receipt of the request:
  - 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;
  - 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.
- (j) If a SAR is submitted in electronic form, any personal data will be provided by electronic means as well.
- (k) 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
  - (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.
- (l) 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 Clerk who will **identify** whether a request has been made under the Data Protection legislation

1. The clerk, 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,

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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:
  - 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
  - Voter Registration Certificate\*

(\* These documents must be dated in the past 12 months, +These documents must be dated in the past 3 months)
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.

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# Shawbury Parish Council

## WEBSITE PRIVACY AND USE POLICY

Reviewed November 2024

### The Policy

The Parish Council Website is [www.shawbury-pc.gov.uk](http://www.shawbury-pc.gov.uk). This policy covers that website and governs the privacy of those who use it. It explains how we comply with the General Data Protection Regulations (GDPR), the Data Protection Act (DPA) and the Privacy and Electronic Communications Regulations (PECR)

This policy explains

- areas of the website that may affect your privacy and personal details;
- how we process, collect, manage and store those details and;
- how your rights under the GDPR, DPA & PECR are adhered to.

Additionally, it will explain the use of cookies or software, advertising or commercial sponsorship from third parties and the download of any documents, files or software made available to you (if any) on the website. Further explanations may be provided for specific pages or features of the website to help you understand how the website and its third parties (if any) interact with you and your computer / device.

### Use of Cookies

Cookies are small files saved to a website users computer / device that track, save and store information about the user's interactions and usage of the website. The allows the website to provide the users with a more tailored experience. Users are advised that if they wish to deny the use and saving of cookies from the website on to their computers hard drive they should take necessary steps within their web browsers security settings to block all cookies from the website and its external serving vendors or use the cookie control system if available upon their first visit.

The website uses cookies to improve the users experience while visiting the website. As required by legislation, where applicable the website uses a cookie control system, allowing the user to give explicit permission or to deny the use of /saving of cookies on their device.

### Website Visitor Tracking

The website may use tracking software to better understand how it is being used. The software will save a cookie to your computer's hard drive to track and monitor your engagement and usage of the website, but will not store, save or collect personal information.

### Adverts and Sponsored Links

The website may contain sponsored links and adverts. These will typically be served through third party organisations, who may have detailed privacy policies relating directly to the adverts they serve. Clicking on any such sponsored links or adverts will send you to the advertiser's website through a referral program which may use cookies and will track the number of referrals sent from the website. This may include the use of cookies which may in turn be saved on your computer's hard drive. Users should therefore note they click on sponsored external links at their own risk and we cannot be held liable for any damages or implications caused by visiting any external links mentioned.

### Downloads

Any downloadable documents, files or media made available on the website are provided to users at their own risk. While all precautions have been undertaken to ensure only genuine

downloads are available, users are advised to verify their authenticity using third party anti-virus software or similar applications. We accept no responsibility for third party downloads and downloads provided by external third party websites and advise users to verify their authenticity using third party anti-virus software or similar applications.

**Contact and Communication with Us**

Users contacting us through the website do so at their own discretion and provide any such personal details requested at their own risk. Your personal information is kept private and stored securely until a time it is no longer required or has no use. Where we have clearly stated and made you aware of the fact, and where you have given your express permission, we may use your details to send you additional information through a mailing list system. This is done in accordance with the regulations named in 'The Policy' above.

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# Shawbury Parish Council

## SECURITY BREACH POLICY

Reviewed March 2026

### Background

Shawbury Parish Council undertakes to comply with all aspects of GDPR. However, should a data breach occur (either through omission or deliberate action) the following actions will be taken:

### Actions to be taken

1. Immediately after identifying the breach the Data Protection Officer (the Clerk) must be contacted.
2. Further investigation is required to identify:
  - a. What has been breached
  - b. Who may be affected
  - c. How the breach occurred
3. The breach must be recorded
4. The DPO will report the breach to the Information Commissioner (ICO) within 72 hours, if the breach has sufficient risks.
5. The data subjects affected must be informed without undue delay. The notification must include:
  - a. The name and contact details of the DPO
  - b. The likely consequences of the data breach
  - c. All measures taken by the council to remedy the breach.

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# Shawbury Parish Council

## INFORMATION AVAILABLE UNDER THE PUBLICATION SCHEME

|  |                               |             |
|--|-------------------------------|-------------|
| <b>Class 1 Who are we and what do we do</b><br>Organisational information, structures, locations and contacts              |                               |             |
| <b>Information to be published</b>   | <b>How it can be obtained</b> | <b>Cost</b> |
| Who's who on the Council and its committees  | Website /Hard Copy            | 10p/sheet   |
| Contact details for Parish Clerk and Council Members named contacts where possible with telephone number and email address | Website /Hard Copy            | 10p/sheet   |

|  |                               |             |
|--|-------------------------------|-------------|
| <b>CLASS 2 - What we spend and how we spend it</b><br>(Financial information relating to projected and actual income and expenditure, procurement contracts and financial audit) |                               |             |
| <b>Information to be published</b>   | <b>How it can be obtained</b> | <b>Cost</b> |
| Annual return form and report by auditor   | Website /Hard Copy            | 10p/sheet   |
| Finalised budget   | Website /Hard Copy            | 10p/sheet   |
| Precept  | Website /Hard Copy            | 10p/sheet   |
| Borrowing Approval Letter (if applicable)  | Hard Copy                     | 10p/sheet   |
| Financial Standing Orders and Regulations  | Hard Copy                     | 10p/sheet   |
| Grants given and received  | Website/Hard Copy             | 10p/sheet   |
| List of current contracts awarded & value of contract  | Hard Copy                     | 10p/sheet   |
| Members' allowances and expenses   | Hard Copy                     | 10p/sheet   |

|  |                               |   |
|--|-------------------------------|---|
| <b>CLASS 3 What our priorities are and how we are doing</b><br>(Strategies and plans, performance indicators, audits, inspections and reviews) |                               |   |
| <b>Information to be published</b>   | <b>How it can be obtained</b> | <b>Cost</b>   |
| Parish Plan (current and previous year as a minimum)   | Website /Hard Copy            | Individual copies free. Multiple requests 10p/sheet |
| Contact details for Parish Clerk and Council Members named contacts where possible with telephone number and email address                     | Website /Hard Copy            | individual copies free. Multiple requests 10p/sheet |
| Quality Status   | n/a                           |   |
| Local Charters drawn up in accordance with DCLG guidelines   | n/a                           |   |

|  |                               |             |
|--|-------------------------------|-------------|
| <b>CLASS 4 How we make decisions</b><br>(Decision making processes and records of decisions) |                               |             |
| <b>Information to be published</b>   | <b>How it can be obtained</b> | <b>Cost</b> |
| Timetable of meetings (Council, any committee / sub  | Website /Hard Copy            | 10p/sheet   |

# Shawbury Parish Council

## INFORMATION AVAILABLE UNDER THE PUBLICATION SCHEME

|  |                    |           |
|--|--------------------|-----------|
| committee meetings and parish meeting)   |                    |           |
| Agendas of meetings (as above)   | Website /Hard Copy | 10p/sheet |
| Minutes of meetings (as above) - Note this will exclude information that is properly provided as private to the meeting        | Website /Hard Copy | 10p/sheet |
| Reports presented to Council meetings - Note this will exclude information that is properly provided as private to the meeting | Website /Hard Copy | 10p/sheet |
| Responses to consultation papers   | Hard Copy          | 10p/sheet |
| Responses to planning applications   | Website /Hard Copy | 10p/sheet |
| Bylaws   | n/a                |           |

### **Class 5 - Our policies and procedures**

(Current written protocols, policies and procedures for delivering our services and responsibilities)

| <b>Information to be published</b>   | <b>How it can be obtained</b> | <b>Cost</b> |
|--|-------------------------------|-------------|
| Policies and procedures for the conduct of Council business  | Hard Copy                     | 10p/sheet   |
| Procedural standing orders   | Hard Copy                     | 10p/sheet   |
| Committee and sub-committee terms of reference   | Hard Copy                     | 10p/sheet   |
| Delegated authority in respect of officers   | Hard Copy                     | 10p/sheet   |
| Codes of Conduct   | Hard Copy                     | 10p/sheet   |
| Policy Statements  | Hard Copy                     | 10p/sheet   |
| Policies and Procedures for the provision of services and about employment of staff                            | Hard Copy                     | 10p/sheet   |
| Internal policies relating to the delivery of services   | Hard Copy                     | 10p/sheet   |
| Equality and Diversity Policy  | Hard Copy                     | 10p/sheet   |
| Health and Safety Policy   | Hard Copy                     | 10p/sheet   |
| Recruitment Polices including current vacancies  | Hard Copy                     | 10p/sheet   |
| Policies/procedures for handling information requests  | Hard Copy                     | 10p/sheet   |
| Complaints procedures (including those covering requests for information and operating the publication scheme) | Hard Copy                     | 10p/sheet   |
| Information security policy  | Hard Copy                     | 10p/sheet   |
| Records management policy (records retention, destruction and archive)   | Hard Copy                     | 10p/sheet   |
| Data Protection policies   | Hard Copy                     | 10p/sheet   |
| Schedule of charges (for the publication of information)   | Hard Copy                     | 10p/sheet   |

### **CLASS 6 Lists and Registers**

Currently maintained lists and registers only

| <b>Information to be published</b>                        | <b>How it can be obtained</b> | <b>Cost</b> |
|---|-------------------------------|-------------|
| Any publicly available register or list (if any are held) | Hard Copy                     | 10p/sheet   |

# Shawbury Parish Council

## INFORMATION AVAILABLE UNDER THE PUBLICATION SCHEME

|  |                    |           |
|--|--------------------|-----------|
| this should be publicised; in most circumstances existing provisions will suffice)   |                    |           |
| Assets register  | Website /Hard Copy | 10p/sheet |
| Disclosure Log (indicating the information that has been provided in response to requests recommended as good practice but may not be held by parish councils) | Hard Copy          | 10p/sheet |
| Register of members' interests   | Hard Copy          | 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 (current information only)

| Information to be published   | How it can be obtained | Cost      |
|---|------------------------|-----------|
| Allotments  | Hard Copy              | 10p/sheet |
| Burial grounds and closed churchyards   | Website/Hard Copy      | 10p/sheet |
| Community centres and village halls   | n/a                    | n/a       |
| Parks, playing fields and recreational facilities   | Website/Hard Copy      | 10p/sheet |
| Seating, litter bins, clocks, memorials and lighting  | Website/Hard Copy      | 10p/sheet |
| Bus shelters  | Website/Hard Copy      | 10p/sheet |
| Markets   | n/a                    | n/a       |
| Public conveniences   | n/a                    | n/a       |
| Agency agreements   | n/a                    | 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      | 10p/sheet |

Contact Details. To obtain hard copies please contact the Parish Clerk at: Westmead, Tilley Road, Wem, SY4 5HA [clerk@Shawbury-pc.gov.uk](mailto:clerk@Shawbury-pc.gov.uk)

Information available on the Council's website can be viewed at: [www.shawbury-pc.gov.uk](http://www.shawbury-pc.gov.uk)

Information can also be inspected by appointment. Such inspection is free of charge unless any fees or undue expenditure are incurred by the Council, which will be charged at cost.

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| Review Frequency | Four-Yearly at Annual PC Meeting |
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# Shawbury Parish Council

## RECORDS MANAGEMENT POLICY

Reviewed November 2024

Shawbury Parish Council recognises that the efficient management of its documents and records is necessary to comply with its legal and regulatory obligations and to contribute to the effective overall management of the Parish Council. The purpose of this policy is to ensure that there is a standard procedure for maintaining and retaining appropriate documents.

### Scope of the Policy

This policy applies to all records created, received or maintained by the Parish Council in the course of carrying out its functions.

Records are defined as all those documents which facilitate the business carried out by the Parish Council 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. The National Association of Local Councils' (NALC) Legal Topic Note (LTN)40 provides further detail about the length of time documents are kept.

The following documentation is required to be published under the 2014 Transparency Code for Smaller Authorities. Shawbury PC has chosen to publish this data which will also be stored electronically and in hard copy:

- a. All items of expenditure above £100
- b. End of year accounts
- c. Annual governance statement
- d. Internal audit report
- e. List of councillor or member responsibilities
- f. The details of public land and building assets
- g. Minutes, agendas and meeting papers of formal meetings

In addition to the above list, the following will also be stored electronically or in hard copy:

- a. Investment details
- b. Title deeds, leases, agreements and contracts
- c. Register and plans for allotments
- d. Documents relating to burial grounds
- e. Policies
- f. Newsletters

Some of the Parish Council's records will be selected for permanent preservation as part of the Council's archives and for historical research. The LTN 40 states that meeting minutes, receipt and payment accounts should be archived. The Clerk will liaise with Shropshire Archives to agree receipt of these and possibly other documents of interest.

### Responsibilities

The Parish Council recognises it has a responsibility to maintain its records and record management systems in accordance with the regulatory environment.

The person with overall responsibility for this Policy is the Clerk to the Parish Council.

### Retention of Documents

The Parish Clerk will refer directly to the latest version of National Association for Local Councils (NALC) Legal Topic Note (LTN)40- Local Council's Documents and Records, for information relating to the length of time certain documents should be retained.

The Parish Council will review this policy every four years at the Annual Parish Council Meeting (or where Legal Topic Note 40 is updated) to ensure compliance with national guidance.

The Parish Council will deposit documents required to be retained permanently with Shropshire Archives as necessary.

All documents not required to be retained as per the Retention Schedule will be destroyed once it is clear that they are no longer of use or relevant. For example, the following can be destroyed after 6 years:

- Scales of fees and charges
- Receipt books of all kinds
- Quotations and tenders
- Paid invoices
- Paid cheques
- VAT records
- Petty cash, postage and telephone books
- Members allowances register

#### **The destruction of documents**

Paper documents will be shredded.

Electronic records: All information on the laptop hard drive will be professionally erased prior to disposal.

**Appendix A****Retention of Documents Required for Audit of Parish Councils**

Taken from NALC Legal Topic Note 40 (2022)

| <b>Documents</b>   | <b>Minimum Retention Period</b>                            | <b>Reason</b>   |
|--|--|---|
| Minute books   | Indefinite   | Archive   |
| Scales of fees and charges                                 | 6 years  | Management  |
| Receipt and payment accounts                               | Indefinite   | Archive   |
| Receipt books of all kinds                                 | 6 years  | VAT   |
| Bank statements, including deposit/savings accounts        | Last completed audit year                                  | Audit   |
| Bank paying-in books                                       | Last completed audit year                                  | Audit   |
| Cheque book stubs  | Last completed audit year                                  | Audit   |
| Quotations and tenders                                     | 6 years  | Limitation Act 1980 (as amended)                        |
| Paid invoices  | 6 years  | VAT   |
| Paid cheques   | 6 years  | Limitation Act 1980 (as amended)                        |
| VAT records  | 6 years generally but 20 years for VAT on rents            | VAT   |
| Petty cash, postage, and telephone books                   | 6 years  | Tax, VAT, and Limitation Act 1980 (as amended)          |
| Timesheets   | Last completed audit year<br>3 years                       | Audit (requirement) and personal injury (best practice) |
| Wages books  | 12 years   | Superannuation  |
| Insurance policies   | As long as it is possible for a claim to be made under it. | Management and legal proceedings.                       |
| Certificates for Insurance against liability for employees | Indefinitely   | Future claims   |
| Investments  | Indefinite   | Audit and management                                    |
| Title deeds, leases, agreements, contracts                 | Indefinite   | Audit and management                                    |
| Members allowances register                                | 6 years  | Tax, Limitation Act 1980 (as amended)                   |

|                  |                                  |
|------------------|----------------------------------|
| Adopted          | March 2026                       |
| Review Frequency | Four-Yearly at Annual PC Meeting |
| Next Review due  | May 2030                         |