

SHANKLIN TOWN COUNCIL

Data Audit

2026/27

LEGISLATION

The purpose of a data audit is to find out what data Shanklin Town Council processes, what is it used for, where it is located and who has access to it.

It is an important step in assessing whether there are any risks in the type of processing the Council carries out and operates within the:

- Data Protection Act 2018
- Data Use and Access Act 2025

WHAT IS A DATA AUDIT?

Retention of information 'just in case' it could be useful doesn't mean it's necessary or proportionate to hold on to it. The Town Council benefits by giving its records an annual 'Spring Clean' and we delete or destroy old data sets that have built up over the past and during the present administration periods.

Where staff or Member changes take place, a formal handover processes are in place to ensure staff moving on hand over relevant data to new staff and they delete or destroy the rest.

When elected Member changes take place (i.e., every 4 years following an ordinary election- or at a subsequent by-election) outdated email accounts and records are deleted and information contained within is destroyed.

DOCUMENT	PERSONAL DETAILS HELD	PURPOSE	HOW INFORMATION IS HELD	LEGAL BASIS	TIME TO BE HELD	SHARED WITH/ACCESS	PURPOSE FOR SHARING
CCTV	IMAGES	AND DATA					
Images & Data	Images	Crime & the prevention of	Electronically	Crime & Disorder Act 1998 s.17	As Necessary	Only shared with police/crime Agencies	n/a
CONTRACTORS	PROCUREMENT						
Contractors providing goods or services	Contact details, tender notices, contracts between both parties	Contractual	Electronically & hard copies	Local Gov. Act 1972 Procurement Act 2025	Life of the contract & up to 7 years for auditing purposes	Not shared externally. Staff access only	n/a
COUNCILLORS							
Application Co-option	Contact details & written application	References	Electronically Hard copy	Public request	For 3 months or until vacancy filled	Not shared externally Staff access only	n/a

Contact information	Individual Cllr contact information	For public contact	Electronically Hard copy Contact forms Website	Public request	Updated & amended as needed. Retained for one year after leaving	Public via website	Public contact information
Declaration of Interest Forms	Pecuniary & non Pecuniary interests of all Cllrs	Legal Requirement	Electronically Hard Copy Website	Legal requirement Localism Act 2012	Whilst individuals remain an elected Member	Town Council & Isle of Wight Council website	Public Information
EMAILS							
Staff & Cllrs using accepted assertion 10 email addresses	Names email Addresses Personal information	Information receiving & sharing communication between staff, Cllrs, Statutory bodies, the public	Electronically	Contractual Public request	Up to 6 months some may be kept longer if deemed appropriate	Town Council External bodies (upon receipt of legitimate request.	Usually n/a Legal use only.
INSURANCE							
Insurance policy Certificates & associated documents.	Insurance Schedule(s)	To evidence sufficient & mandatory insurance cover for council activities & services.	Electronically. Hard copy.	Employers' Liability (Compulsory Insurance) Act 1969	Indefinitely	Certificates published on website. May be shared with statutory agencies/authorities	Legal requirement. Contractual

HALL HIRE							
Hire forms & confirmation & associated documents	Names, addresses Phone number Hire dates etc	Contractual Financial records	Electronically Until confirmed then hard copies	Contractual	Up to 7 years audit purposes	Staff only access	n/a
INVOICES							
Invoices	Goods & Services Received & supplied	Financial records, AGAR & Audit	Electronically Hard copy.	LGA 1972 Account Audit 2015. Procurement Act 2025	Up to 7 years audit purposes	Not shared externally. Available public review upon request	Account & Audit Act 2015
Payments for goods & services	Remittance Advices	Payment of invoices	Electronically Hard copy	Contractual LGA 1972 Account & Audit Act 2015 Procurement Act 2023	Whilst providing services & up to one year after end of contract 7 years for VAT	Not shared externally Staff access	Account & Audit Act 2015
CORRESPONDENCE	(GENERAL)						
Correspondence From the public Excluding email	Personal details (i.e. name, address Contact number)	To respond to correspondence	Electronically Hard copy	Public request	Destroyed once Matter dealt with	Staff (members as Necessary)	To assist & aid electorate
PLANNING	APPLICATIONS						

Planning list	Personal details i.e. name, address contact number	To respond to Planning Applications	Electronically	Statutory Consultee Town & Country Planning Act 1990	Until Town Council has submitted corporate responses	Staff, Cllrs, Public information publicly available elsewhere IWC website	Planning process
GRANT FORMS							
Grant forms Policy to give grants Completed grant Forms requestees Accounts & other information	Personal details Bank details	To aid grant giving	Electronically for a short time Hard copy	Public Request	7 years	Staff Councillors Agenda, minutes website	n/a
Personnel							
Employment Docs	Contact details NI number Personal details Employment History Qualifications	Managing Employment of employees	Electronically Hard copy	Employment Rights Act 1996	6 years after Employment Has ceased	Not shared Externally	n/a
Job applications	Contact details NI number Personal details Employment History Qualifications	Recruitment	Electronically Hard copy	Equality Act 2010 Data Protection Law	6 months after Vacancy filled After notifying Successful Applicant	Not shared Externally	n/a
MINUTES & ADMIN							
Agendas and Minutes	Agendas & Minutes pertaining to meetings	Legal Requirement	Electronically Hard copy Website	Local Government Act 1972	Indefinitely	Electronically Website Hard copies in	Public Information Openness &

		Record of Minutes				Office Signed Copies Minutes Retained in fireproof cabinets	Transparency
MEMBERS	OF THE	PUBLIC					
Electoral Register	Names & Addresses	Reference	Electronic copy only Only to be accessed for legitimate reasons i.e. Town Meeting	Electoral Registration & Admin Act 2013	Current year Only (until new or updated register is issued by IWC)	Not shared IWC share the document	n/a
Enquires from Member of the Public	Contact details Queries	To request information, pass on information	Electronic (emails) Hard copy letters	LGA's 1972 1986, 1988, LG Electronic comms order 2015	Various Dependent on query	Not shared externally. Staff, Cllr. access only	May be shared under FOI Redacted as Necessary to Comply with legislation
Phone calls from members of the public are recorded							

This policy will be reviewed annually or as legislation dictates or best practice determines.

Shanklin Town Council IT Policy

1. Introduction

Shanklin Town council recognises the importance of effective and secure information technology (IT) and email usage in supporting its business, operations, and communications.

This policy outlines the guidelines and responsibilities for the appropriate use of IT resources and email by council members, employees, volunteers, and contractors.

2. Scope

This policy applies to all individuals who use Shanklin Town Council's IT resources, including computers, networks, software, devices, data, and email accounts.

3. Acceptable use of IT resources and email

Shanklin Town Council IT resources and email accounts are to be used for official council-related activities and tasks. Limited personal use is permitted, provided it does not interfere with work responsibilities or violate any part of this policy. All users must adhere to ethical standards, respect copyright and intellectual property rights, and avoid accessing inappropriate or offensive content.

4. Device and software usage

Where possible, authorised devices, software, and applications will be provided by Shanklin Town Council for work-related tasks.

Unauthorised installation of software on authorised devices, including personal software, is strictly prohibited due to security concerns.

5. Data management and security

All sensitive and confidential Shanklin Town Council data should be stored and transmitted securely using approved methods. Regular data backups should be

performed to prevent data loss, and secure data destruction methods should be used when necessary.

6. Network and internet usage

Shanklin Town Council's network and internet connections should be used responsibly and efficiently for official purposes. Downloading and sharing copyrighted material without proper authorisation is prohibited.

7. Email communication

Email accounts provided by Shanklin Town Council are for official communication only. Emails should be professional and respectful in tone. Confidential or sensitive information must not be sent via email unless it is encrypted.

Be cautious with attachments and links to avoid phishing and malware. Verify the source before opening any attachments or clicking on links.

8. Password and account security

Shanklin Town Council users are responsible for maintaining the security of their accounts and passwords. Passwords should be strong and not shared with others. Regular password changes are encouraged to enhance security.

9. Mobile devices and remote Work

Mobile devices provided by Shanklin Town Council should be secured with passcodes and/or biometric authentication. When working remotely, users should follow the same security practices as if they were in the office.

10. Email monitoring

Shanklin Town Council reserves the right to monitor email communications to ensure compliance with this policy and relevant laws. Monitoring will be conducted in accordance with the Data Protection Act and GDPR.

11. Retention and archiving

Emails should be retained and archived in accordance with legal and regulatory requirements. Regularly review and delete unnecessary emails to maintain an organised inbox.

12. Reporting security incidents

All suspected security breaches or incidents should be reported immediately to the designated IT point of contact for investigation and resolution. Report any email-related security incidents or breaches to the IT administrator immediately.

13 Training and awareness

Shanklin Town Council will provide regular training and resources to educate users about IT security best practices, privacy concerns, and technology updates. All employees and councillors will receive regular training on email security and best practices.

14. Compliance and consequences

Breach of this IT and Email Policy may result in the suspension of IT privileges and further consequences as deemed appropriate.

15. Policy review

This policy will be reviewed annually to ensure its relevance and effectiveness. Updates may be made to address emerging technology trends and security measures.

16. Contacts

For IT-related enquiries or assistance, users can contact Deputy Town Clerk Jon Gilbey.

All staff and councillors are responsible for the safety and security of Shanklin Town Council's IT and email systems. By adhering to this IT and Email Policy, Shanklin Town Council aims to create a secure and efficient IT environment that supports its mission and goals.

Date: _____

Signature: _____

Role: _____



SHANKLIN TOWN COUNCIL

RISK MANAGEMENT SCHEME 2026 - 2027

DEFINITION OF RISK MANAGEMENT

Risk is an uncertain event or condition that, if it occurs, will have an effect on the achievement of the Town Council's objectives. The following Risk Management scheme is designed to identify and assess the risks associated with what the Town Council does and the services which it provides.

The document is created to identify what can go wrong and the steps to avoid this happening and to successfully manage the consequences if the risk were to happen.

The Town Council is aware that although some risks can be unavoidable, it has in place a strategy that provides a structured, efficient and focused approach to managing risk, which:

- Identifies the subject.
- Identifies what the risk may be.
- .Evaluates the potential consequences to the Town Council if an event identified as a risk takes place in terms of likelihood and impact)
- Evaluates the management and control of the risk and records findings.
- Records, Review, Assesses and Revises procedures if required.

ASSESSMENT OF RISK

Each risk will be assessed in terms of its likelihood and impact on the Town Council.

LIKELIHOOD

SCORE	DEFINITION	PROBABILITY	POSSIBLE INDICATORS
4	Almost Certain	90%	Frequent Occurrence
3	Likely	60%	Regular Occurrence
2	Possible	10%	Occasional Occurrence
1	Unlikely	< 10%	Has never happened

IMPACT

		RISK THREAT
4	Major	Financial impact > £500,000 Fatality/disabling injuries to public or staff / adverse national media attention / external intervention / total service disruption / extensive legal action against the council
3	Serious	Financial impact > £250,000 Adverse local media attention / extensive public complaints / adverse comments by regulators or auditors / significant service disruption / failure to deliver projects or targets / service disruptions / injuries to public or staff / legal action against the Town Council
2	Significant	Financial impact > £50,000 Adverse service users complaints / service disruption / minor injuries and near misses to staff and public
1	Minor	Financial impact less than £5,000 / isolated complaints / minor service disruption

RISK MATRIX

Likelihood

4	4	8	12	16
3	3	6	9	12
2	2	4	6	8
1	1	2	3	4
	1	2	3	4

High
Medium
Low

THE KEY RISKS

The key risks for the Town Council are assessed for impact and likelihood (using the criteria listed above); so that risks are identified as low, medium, or high.

Controls are then identified to mitigate the risk. It is anticipated that the risk will be reviewed annually unless there is a change in intelligence. The table also assigns responsibility for the risk.

FINANCE

<u>Subject</u>	<u>Risk (s) Identified</u>	<u>Impact</u>	<u>Likelihood</u>	<u>Risk Score</u>	<u>Management/ Control of Risk</u>	<u>Review/ Assess/ Revise</u>	<u>Responsibility</u>
Insurance	Suitable Cost Compliance Fidelity Guarantee	3	1	3	<ul style="list-style-type: none"> • An annual review is undertaken of all insurance arrangements provided with the best quote by an insurance broker. which include: <ul style="list-style-type: none"> • Employers • Employee Liabilities • Fidelity • Public Liability • Assets and Equipment • It's the Town Clerks responsibility to keep insurance company informed of any changes that will affect the Insurance. 	Existing procedure is reviewed annually in Sept/October	Town Clerk RFO

Precept	Tolerability of precept	3	1	3	<ul style="list-style-type: none"> The council monitors its budget monthly. Budgets and information are prepared for the Finance Group in February. The figures considered by the Finance Group are recommended to Council in February to agree budget & set precept. 	Existing procedure is reviewed annually	Town Clerk RFO Finance Group
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					<ul style="list-style-type: none"> Contingency plans submitted to PWLB and in place to redirect funds from other budgets to cover loans 	n/a	
Payments/Cash/Debit Card	Lose through theft or dishonestly	3	1	3	<ul style="list-style-type: none"> Monthly reconciliation prepared by RFO and checked by the Town Mayor for verification purposes. Two signatories on cheques. A signatory on invoices. We do not have a debit card. All payments must be detailed & presented to council under the agenda item orders for payment. The Town Mayor countersigns all invoices for payment. Petty cash for the purposes of scribe is the library float. 	Existing procedures Satisfactory Annual review of Financial Regulations and Policies is annually in February	Town Clerk Deputy Town Clerk Town Mayor

					All cash from toilets, library is kept in a metal locked cupboard until banked.		
Banking	Insufficient checks	3	1	3	<ul style="list-style-type: none"> The Council has Financial Regulations which set out the requirements for banking, cheques and internal audit. Payment made by BACS FPO, DD. By RFO & Deputy Clerk one inputting one authorising or in absence of one then a Councillor. Cheques require two signatories 	Existing procedures Satisfactory Annual review of Financial Regulations February	Town Clerk RFO Deputy Town Clerk Councillor
Clerk	Loss of Clerk	3	2	6	<ul style="list-style-type: none"> In the event of the Town Clerk resigning, the Deputy Town Clerk will step in whilst a replacement is sought. 	Membership SLCC maintained.	Town Mayor Town Clerk RFO

							Deputy Town Clerk
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	Fraud	3	1	3	<ul style="list-style-type: none"> take responsibility for the temporary or a locum will be employed. The requirements of Fidelity Guarantee insurance must be adhered to. Internal procedures in place. The Town Clerk should be provided with relevant training, reference books, access to assistance and legal advice. Payroll is through HMRC Basic PAYE system. 	Regular meetings with Town Mayor	
	Salary paid incorrectly	2	2	4		Existing procedures satisfactory	
Payroll Pension	Breach of employment laws including NI and tax	1	1	1	<ul style="list-style-type: none"> Payroll is paid via HMRC Basic PAYE system reviewed by council during the orders of payment. Contract of Employment in place for all employees Salaries are according to NJC pay scales All eligible staff are enrolled into the LGPS (IWC) 	Annual Audit carried out by Internal Auditor.	Town Clerk RFO
VAT	Re-claiming/ charges	2	1	2	<ul style="list-style-type: none"> The council has financial regulations which set out the requirements. VAT recovered quarterly. 	Existing procedures satisfactory	Town Clerk RFO

Election Costs	Risk of elections costs	2	3	6	<ul style="list-style-type: none"> • Risk in an election year. The council puts funds into an EMR each year from precept to lessen the cost to the tax payer in the event of contested election. • Costs are met from raising precept and the EMR. 	Existing procedures satisfactory	Town Clerk RFO Town Council

Annual Governance and Accountability Return (AGAR)	Audit documents are not submitted within time limits	1	1	1	<ul style="list-style-type: none"> • Complete end of year finance • The AGAR is then completed and signed by the Town Council and the Internal Auditor. It is then checked and sent on to the External Auditor within time limit. • Town Clerk prepares a timetable for submission. 	Existing procedures satisfactory	Town Clerk RFO
Receipt of Grants or paid	Ensuring proper use of funds granted to local community bodies under	2	1	2	<ul style="list-style-type: none"> • No regular grants received. • Terms and conditions of grants would be fulfilled. • Comply with the Town Councils grant policy 	Existing procedures satisfactory	Town Clerk RFO Town Council

	specific powers, i.e. s137						
Best value accountability	Work awarded Incorrectly. Overspend on services	2	1	2	<ul style="list-style-type: none"> Financial Regulations followed. Quotations/estimates obtained where required. Financial controls to be undertaken and monitored. Procurement procedures to be followed. Following Town Council approval, where possible, local trades people will be awarded contracts/work. 	Existing procedure adequate. Ensure procedures are included in Financial regulations and Standing Orders .	Town Clerk RFO Town Council

Business Continually	Town Council not being able to continue its business due to an unexpected or tragic circumstance	2	1	2	<ul style="list-style-type: none"> • All electronic files and recent records (both paper and electronic) are kept at the Town Council Office. • The Town Council has a secure backup system that backs up files. • In the event of the Town Clerk being indisposed the Deputy Town Clerk will provide administrative support. 	Existing procedures satisfactory	Town Clerk RFO Deputy Town Clerk
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					<ul style="list-style-type: none"> • The ability to work off site is provided should the need arise. 		
Meeting Location Falcon Cross Hall	Health and Safety	2	1	2	<ul style="list-style-type: none"> • Meetings are held in Falcon Cross Hall The Hall complies with health and safety, accessibility and comfort aspect for Town Clerk, Deputy Town Clerk, Councillors and any Public who attend. There is disabled access to the building & a disabled toilet. The office has a disabled toilet. • • 	Existing procedures satisfactory	Town Clerk RFO Town Council
Council Records	Loss through damage, Fire and theft	2	1	2	<ul style="list-style-type: none"> • Current papers are held in the Town Council Office. Keys to the office are held by the Town Clerk RFO & Deputy Town Clerk. • 	Damage or theft is unlikely and so	Town Clerk RFO Town Council

					Archived papers are held in locked metal cupboards in a locked cupboard in Falcon Cross Hall.	provision satisfactory	
Council Electronic Records	Loss through damage	2	1	2	<ul style="list-style-type: none"> The Town Council's electronic records are stored on the Town Council computer and laptop. The Council has a secure online finance system, and it is kept in the Cloud. Backup system is stored on a hard drive and kept in a locked filing cabinet when the office closed for holidays the hard drive is kept at the Town Clerk's home. 	provision satisfactory	Town Clerk RFO Deputy Town Clerk

LIABILITY

<p>Minutes/ Agendas/ Statutory document</p>	<p>Accuracy and legality Non- compliance with statutory requirements</p>	<p align="center">2</p>	<p align="center">1</p>	<p align="center">2</p>	<ul style="list-style-type: none"> • Minutes and agendas are produced in the prescribed method and adhere to legal requirements. • Minutes are approved and signed at next meeting unless there is a resolution made to defer approval until the following meeting. • Minutes and agendas are displayed according to legal requirements. • Business conducted at council and committee meetings should be managed by the chairman according to Standing Orders. 	<p>Existing procedures satisfactory</p> <p>Members to adhere to Code of Conduct and Standing Orders.</p>	<p>Town Clerk RFO Town Council</p>
<p>Public Liability</p>	<p>Risk to third party, property or individuals</p>	<p align="center">3</p>	<p align="center">1</p>	<p align="center">3</p>	<ul style="list-style-type: none"> • Insurance is in place. Contractors used by the council need to provide evidence of Public Liability Insurance. 	<p>Existing procedures satisfactory</p> <p>Insurance is reviewed annually</p>	<p>Town Clerk RFO Town Council</p>

Employer Liability	Non-compliance with employment law Causing injury (damage) to employee property Causing injury (damage to Councillors)	3	1	3	<ul style="list-style-type: none"> • Seek advice from the Town Council's insurance company when required. • Employer's Liability insurance in place. • Insurance cover in place. • Requirements of Fidelity Guarantee insurance adhered to with regards to fraud. • Finance reports presented. • End of Year information reported/internal and external audit controls 	Existing procedures satisfactory	Town Clerk RFO Town Council
Employee Liability						Insurance is reviewed annually	
Fraud by staff							
Councillor Liability							
Legal Liability	Legality of activities	3	1	3	<ul style="list-style-type: none"> • Clerk to clarify legal position on proposals and to seek advice if necessary. 	Existing procedures satisfactory	Town Clerk RFO Town Council

	Proper and timely reporting via Minutes Proper document control				<ul style="list-style-type: none"> • Council always receives and approves minutes at meetings. • Where possible minutes are circulated before the meeting. Retention of document policy in place 	Existing procedures satisfactory	Town Clerk RFO Town Council
Freedom of Information/ Data Protection	Policy Provision	2	1	2	<p>The Town Council has the following documents in place:</p> <ul style="list-style-type: none"> • Privacy Data Notices • Privacy Policy • Data Protection Policy • Document Retentions Policy • Model publication scheme • Assertion 10 • Website Cookie Policy • IT Policy • Councillor Email Policy 	<p>Existing procedures satisfactory</p> <p>Review annually</p>	Town Clerk RFO

COUNCILLORS AND STAFF

Members Interest	Conflict of interest	2	1	2	<ul style="list-style-type: none"> • Councillors have a duty to declare any interest at the start of the meeting or when a conflict becomes apparent during a meeting. 	Members to identify any training needs	Town Clerk RFO Town Councillors
	Register of Members Interests	2	1	3	<ul style="list-style-type: none"> • Register of members interests form to be reviewed at least on an annual basis and a copy is kept by the Town Clerk RFO and IW Council & on website. • Training will be provided for staff and councillors 	Document is reviewed annually in May & when needed	
Councillor and staff	Bringing the Council into disrepute	2	1	1	<ul style="list-style-type: none"> • Councillors understand and receive the Code of Conduct each year. • A professional approach is undertaken on all Town Council matters. • The Code of Conduct is reviewed annually. <p>Training will be provided for staff and councillors when needed.</p>	Members to identify any training needs	Town Clerk RFO Town Councillors
						Document is reviewed annually	

Full implementation of the Control Measures identified in the above risk assessment is the responsibility of Shanklin Town Council.

I certify that the risk assessment above fully complies to the area /task/activity under assessment in Shanklin Town Council

Name: Stella Janeway Town Clerk RFO

Signed:

Date:

Name: Sara Sheath Town Mayor

Signed:

Date:

Adopted at Shanklin Town Council meeting 26 February 2026

SHANKLIN TOWN COUNCIL

DATA PRIVACY NOTICE

INTRODUCTION

This Privacy Notice explains how we collect, use and protect your personal data in accordance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, and the Freedom of Information Act 2000. It also reflects our commitment to the new Assertion 10 requirement in the Annual Governance and Accountability Return (AGAR) commencing 2025/2026

WHO WE ARE

We are the data-controller for personal data collected and processed by the Town Council. Our contact details are:

Town Clerk RFO:

Email: clerk@shanklintowncouncil.co.uk

Postal Address 65 Landguard Road Shanklin Isle of Wight PO37 7JX

Deputy Town Clerk jongilbeystc@shanklintowncouncil.co.uk

Postal Address 65 Landguard Road Shanklin Isle of Wight PO37 7JX

WHAT DATA WE COLLECT

We may collect and process the following types of personal data:

- Contact details – names, addresses, phone number, email.
- Correspondence & communications with the Town Council
- Information submitted via forms, surveys, or consultations
- Data related to Town Council services

LEGAL BASIS FOR PROCESSING

We process personal data under the following lawful bases:

- **Legal Obligation** - to comply with statutory duties
- **Public task** – to carry out official functions
- **Consent** – where you have given clear permission

HOW WE USE YOUR DATA

Your data is used to:

- Respond to enquires & service requests

- Administer Town Council services & events
- Maintain statutory records
- Fulfil transparency & accountability obligations

DATA SHARING

We do not sell your data. We may share it with:

- Internal Staff and Council members
- External auditors & regulatory bodies
- Service providers acting on our behalf
- Other public authorities where legally required

DATA RETENTION

We retain personal data only as long as necessary. Our Retention & Disposal Policy outlines specific retention periods.

YOUR RIGHTS

You have the right to:

- Access your personal data
- Request correction or deletion
- Object to processing
- Withdraw consent (where applicable)
- Lodge a complaint with the Information Commissioner's Office

DIGITAL & DATA GOVERNANCE

In line with Assertion 10 we have implemented:

- A Council owned domain & email system (clerk@shanklintowncouncil.co.uk)
- An IT Policy
- A website that meets WCAG 2.2AA accessibility standards

CONTACT US

If you have any questions about this notice or your data, please contact us:

Email: clerk@shanklintowncouncil.co.uk

Phone: 01983 865101

Address: Shanklin Town Council 65 Landguard Road Shanklin Isle of Wight PO37 7JX

SHANKLIN TOWN COUNCIL

Freedom of Information Publication Scheme for Shanklin Town Council

Class 1 – Who we are and what we do (Organisational information, structures, locations and contacts)	
Information to be published (This will be current information only)	How the information can be obtained
Who's on the Council and its Committees	Town Council Website
Contact details for Town Clerk and Council members (named contacts where possible with telephone number and e-mail address if used)	Town Council Website
Staffing structure	Town Council Website

Class 2 – What we spend and how we spend it (Financial information relating to projected and actual income and expenditure, procurement, contracts and financial audit)	
Information to be published	How the information can be obtained
Current and previous financial year	Town Council Website
Annual return form and report by auditor	Hard copy from Council Office
Finalised budget	Town Council Website (minutes of relevant Town Council meeting)
Precept	Town Council Website (minutes of relevant Town Council meeting)
Financial Standing Orders and Regulations	Town Council Website
Grants given and received	Town Council Website
List of current contracts and contracts over £5000	Town Council Website

Class 3 – What our priorities are and how we are doing (Strategies and plans, performance indicators, audits, inspections and reviews)	
Information to be published	How the information can be obtained
Annual Report to Town Meeting (current and previous year)	Town Council Website

Class 4 – How we make decisions (Decision making processes and records of decisions)	
Information to be published	How the information can be obtained
Timetable of meetings (Council, committee/sub-committee meetings and town meetings)	Town Council Website
Agendas of meetings (as above)	Town Council Website & Falcon Cross Notice board
Minutes of meetings (as above) (N.B. This will exclude information that is properly regarded as private to the meeting)	Town Council Website
Reports presented to Council meetings (N.B. This will exclude information that is properly regarded as private to the meeting)	Town Council Website. Council Office.
Responses to consultation papers	Minutes
Responses to planning applications	Town Council Website (minutes of relevant Planning Committee meeting)

Class 5 – Our policies and procedures (Current written protocols, policies and procedures for delivering our services and responsibilities) Current information only	
Information to be published	How the information can be obtained
Policies and procedures for the conduct of council business:	Town Council Website
Procedural standing orders	Town Council Website
Code of conduct	Town Council Website

Policy statements	Town Council Website
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Class 6 – Lists and Registers	
Currently maintained lists and registers only	
Information to be published	How the information can be obtained
Assets Register	Town Council Website
Register of members' interests	Town Council Website
Register of gifts and hospitality	Town Council Website

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 the information can be obtained
Allotments	n/a
Burial grounds and closed churchyards	n/a
Community centres and village halls	Town Council Website
Parks, playing fields and recreational facilities	n/a
Seating, litter bins, clocks, memorials and lighting	Town Council Website
Bus shelters	n/a
Markets	n/a
Public conveniences	Town Council Website
Agency agreements	Hard copy from Council Office
A summary of services for which the council is entitled to recover a fee, together with those fees (e.g. burial fees)	n/a

Exempt Material:

- Personal information relating to Councillors (other than required to be declared in Register of Interests)
- Personal information relating to employees
- Tenders and bids from contractors and suppliers

(Note: Data Protection Legislation prohibits the publication of certain categories of information)

Charging Policy:

Information can be inspected, by appointment, at the Town Council's Office free of charge.

Information that can be photocopied without breaching copyright laws can be copied on the Council's photocopier at the cost of 20p per black & white single sided A4 sheet, 25p per black & white double-sided sheet and 30p per colour single sided sheet and 35p per double sided sheet.

A detailed search of records (for example the Council Minutes or archive material) is subject to a charge of £20 per search plus the relevant photocopying charges.

Any photocopies sent by post will be subject to the actual cost of postage and packaging.

Review of Policy:

This policy will be reviews as and when necessary.

Note 1: Any information which is available on the Town Council's website is also available from the Council's Office subject to the charges set out above for printed copies.

Note 2: Under Data Protection Legislation, the Council is required to review regularly the information that it keeps and to destroy that which does not form part of its official records. Residents wishing to inspect information are therefore requested to telephone the Town Council's Office to ensure that the information they require is still available.

Contacts:

Town Clerk RFO 01983 865101 Email: clerk@shanklintowncouncil.co.uk

Deputy Clerk 01983 865101 Email: jongilbeystc@shanklintowncouncil.co.uk

SHANKLIN TOWN COUNCIL

DATA PROTECTION POLICY

PURPOSE OF THE POLICY

This policy explains to councillors, staff and the public about data protection and how Shanklin Town Council undertakes to manage data. The Town Council is covered by the Data Use & Access Act, the UK General Data Protection Regulation (GDPR) The Data Protection Act 2018 and the Privacy and Electronic Communications Regulations (PECR).

Personal data must be processed lawfully, fairly and transparently; collected for specified, explicit, and legitimate purposes; be adequate, relevant and limited to what is necessary for processing; be accurate and kept up to date; be kept for only as long as it necessary for processing and be processed in a manner that ensures its security. This policy explains the duties and responsibilities of the Town Council and it identifies the means by which the Council will meet its obligations.

IDENTIFYING THE ROLES AND MINIMISING RISK

The General Data Protection Regulations and the Data Protection Act 2018 require that everyone within the Town Council must understand the implications of data protections and that roles and duties must be assigned. The Council is the data controller and the Town Clerk/Deputy Town Clerk are the data processors. It is the data processors duty to undertake an information audit and to manage the information collected by the Council, the issuing of privacy statements, dealing with requests and complaints raised and the safe disposal of information.

Data protection regulations require continued care by everyone within the Council, councillors and staff. In the sharing of information about individuals, whether as a hard copy or electronically. A breach of the regulations could result in the Council facing a fine from the Information Commissioner's Office (ICO) for the breach itself and to compensate the individual(s) who could be adversely affected. Therefore, the handling of information is seen as medium risk to the council (both financially and reputationally) and one which is included in the Risk Management Policy of the council.

DATA BREACHES

The Town Clerk/Deputy Town Clerk will investigate breaches. Investigations must be undertaken within one month of the report of a breach. Procedures are in place to

detect, report and investigate a personal data breach. The ICO will be advised of a breach (within 3 days) where it is likely to result in a risk to the rights and freedoms of individuals – if, for example, it could result in discrimination, damage to reputation, financial loss, loss of confidentiality, or any other significant economic or social disadvantage. Where a breach is likely to result in high risk to the rights and freedoms of individuals, the Clerk will notify those concerned directly.

PRIVACY NOTICES

Being transparent and providing accessible information to individuals about how the Council uses personal data is a key element of the Data Protection Act 2018 and the EU General Data Protection Regulation (GDPR). The most common way to provide this information is in a privacy notice. This is a notice to inform individuals about what a council does with their information. A privacy notice will contain the name and contact details of the data controller, the purpose for which the information is to be used and the length of time for its use. It should be written clearly and should advise the individual that they can, at any time, withdraw their agreement for the use of this information (if applicable). Issuing of a privacy notice must be detailed on the Information Audit kept by the council. The council uses a privacy notice on its website; all email communications and any mailing list opt in form. Where consent is being relied on as the lawful basis for processing the data, privacy notices must be verifiable.

INFORMATION AUDIT

The Clerk must undertake an information audit which details the personal data held, where it came from, the purpose for holding that information and with whom the council will share that information. This will include information held electronically or as a hard copy. Information held could change from year to year with different activities, and so the information audit will be reviewed at least annually. The information audit review should be conducted ahead of the review of this policy and the reviews should be minuted.

INDIVIDUAL'S RIGHTS

GDPR give individual rights:

- The right to be informed
- The right of access
- The right to rectification
- The right to erasure
- The right to restrict processing
- Right to data portability
- The right to object
- The right not be subject to automated decision-making incl. profiling.

If a request is received to delete information, then the Clerk must respond to this Request within a month. The Clerk has the delegated authority from the Council to delete information.

If a request is considered to be manifestly unfounded then the request could be Refused or a charge may apply. The Council will be informed of such requests and Will determine the charge.

CHILDREN

There is special protection for the personal data of a child. The age when a child can give their own consent is 13. If the council requires consent from young people under 13, the council must obtain a parent or guardian's consent in order to process the personal data lawfully. Consent forms for children aged 13 plus, must be written in language that they will understand.

SUMMARY

The main actions arising from this policy are:

- The council must be registered with the ICO.
- A copy of this policy will be on the council's website
- An information audit will be conducted and reviewed at least annually
- Privacy notices must be issued
- Data protection is included on the Council's Risk Management Policy.

This policy document is written with current information and advice. It will be reviewed annually or when further advice is issued by the ICO.

SHANKLIN TOWN COUNCIL

Schedule of Charges

Type of Charge	Description	Basis of charge
Disbursement cost	Photocopying @ 2 per sheet (black & white)	Administration
	Photocopying @ 80p per sheet (colour)	Administration
	Postage	Actual cost of Royal Mail standard 2 nd class

SHANKLIN TOWN COUNCIL: DATA & DOCUMENT RETENTION POLICY

This policy sets out the governance arrangements for the retention of all electronic and paper-based data and the management public parish records, archives and files.

1. The purpose of this Policy is to ensure that necessary records and documents are adequately protected and maintained and to ensure that records that are no longer needed by Shanklin Town Council or are of no value are discarded at the proper time. This Policy is also for the purpose of aiding employees of the Council in understanding their obligations in retaining electronic documents - including e-mail, Web files, text files, PDF documents, and all Microsoft Office or other formatted files.
2. Attached as Appendix A is a Record Retention Schedule that is approved as the initial maintenance, retention and disposal schedule for physical records of Shanklin Town Council and the retention and disposal of electronic documents. The Town Clerk is the officer in charge of the administration of this policy and the implementation of processes and procedures to ensure that the Record Retention Schedule is followed. The Town Clerk is also authorised to: make modifications to the Record Retention Schedule from time to time to ensure that it is in compliance with new Acts of Parliament and department regulations.
3. This policy is overseen by the Town Council as a body corporate and should be periodically reviewed to ensure it is fit for purpose and adhered to.
4. Files managed as part of this system are codified and managed by the Town Clerk. Public records may be inspected by making an appointment during reasonable hours with the Town Clerk by emailing the Town Clerk at: clerk@shanklintowncouncil.co.uk

APPENDIX A

RECORD RETENTION SCHEDULE

RECORD TYPE	PUBLIC ARCHIVE	RETENTION PERIOD
ACCIDENT REPORTS	NO	15 YEARS FROM FILED DATE
ACCOUNTS	NO	7 YEARS FROM FINANCE YEAR END
ANNUAL BUDGETS	YES	INDEFINITE
BANK STATEMENTS	NO	7 YEARS FROM FINANCE YEAR END
BOOKING & HIRE FORMS	NO	7 YEARS FROM FINANCE YEAR END
BYELAWS	n/a	n/a
CCTV FOOTAGE	NO	30 DAYS
COMMUNITY GROUP NEWSLETTERS	n/a	n/a
CONSULTANT REPORTS	NO	5 YEARS
CONTRACTS & RELATED CORRESPONDENCE	NO	7 YEARS FROM TERMINATION OF CONTRACT
CORRESPONDENCE NOT FILED WITH A RESOLUTION	NO	FOR AS LONG AS NECESSARY
CREDIT CARD RECORDS	N/A	n/a
DBS DISCLOSURES	NO	1 WEEK AFTER RECEIPT
EMPLOYEE CONTRACTS	NO	5 YEARS FROM END OF EMPLOYMENT
EMPLOYEE EXPENSES	NO	7 YEARS FROM FINANCE YEAR END

RECORD TYPE	PUBLIC ARCHIVE	RETENTION PERIOD
EMPLOYEE PAYROLL	NO	7 YEARS FROM FINANCE YEAR END
EMPLOYEE PENSIONS	NO	INDEFINITE
EMPLOYEE RECORDS	NO	5 YEARS FROM END OF EMPLOYMENT
EMPLOYEE TIMESHEETS	NO	7 YEARS FROM FINANCE YEAR END RELATES TO ONE EMPLOYEE
FULL COUNCIL & COMMITTEE AGENDAS	YES	INDEFINITE
GRANT APPLICATIONS MADE	YES	INDEFINITE

GRANT APPLICATIONS RECEIVED	NO	7 YEARS FROM FINANCE YEAR END
HEALTH & SAFETY RECORDS	NO	INDEFINITE
INSURANCE CERTIFICATES	YES	INDEFINITE
INSURANCE CLAIMS	YES	INDEFINITE
INSURANCE SCHEDULES	YES	INDEFINITE
INT/EXT AUDIT REPORT	YES	INDEFINITE
INVESTMENT RECORDS	NO	7 YEARS FROM FINANCE YEAR END
LEGAL ADVICE RECEIVED	YES	INDEFINITE
MEMBERS REGISTER OF INTERESTS	YES	FOR THE DURATION OF OFFICE IWC KEEP REGISTER OF INTERESTS
MINUTE BOOKS	YES	INDEFINITE
PROPERTY LEASES	YES	INDEFINITE
PROPERTY RECORDS & VALUATIONS	YES	INDEFINITE

PUBLIC CONSULTATIONS	YES	INDEFINITE
RESOLUTION FILES	YES	INDEFINITE
RISK ASSESSMENTS	NO	INDEFINITE
STOPPED CHEQUES	NO	7 YEARS FROM FINANCE YEAR END
SURVEYS AND REFERENDA	YES	INDEFINITE
TENDERS	NO	7 YEARS FROM FINANCE YEAR END
TREE PRESERVATION ORDERS	YES	IW COUNCIL KEEP DOCUMENTS
UNSUCCESSFUL JOB APPLICATIONS	NO	SIX MONTHS AFTER INTERVIEWS
VAT RECORDS	NO	7 YEARS FROM FINANCE YEAR END



SHANKLIN TOWN COUNCIL

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We use Google Analytics to collect information about how people use our site, and rough demographics as to what groups of people are using our site. We do this to make sure it's meeting your needs and to understand how we could improve it. You can [opt out of Google Analytics tracking](#).

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