

Fen Ditton Parish Council
www.fenditton-pc.gov.uk
e.mail: clerk@fenditton-pc.gov.uk
Tel: 07442768348

All members of the Council are summoned to attend the Annual General Meeting of Fen Ditton Parish Council on Tuesday, 2 June 2026 at 7.00 p.m. **The Hangar Marleigh Office** for the purposes of considering and resolving the business to be transacted at the meeting as set out in the agenda below. Councillors may observe proceedings remotely and speak at the chair's discretion, but remote attendance shall not be counted as attendance for the purposes of quorum or voting.

Members of the public are invited to address the meeting between 7.00 p.m. and 7.15 p.m.

Maximillian Huber

Clerk & RFO

1st Floor, The Hangar Building,

2 Jubilee Sq, Cambridge CB5 8UW

A G E N D A

LGA 1972 s12 10(2)(b) states that business must be specified on the agenda; therefore the Council cannot lawfully agree any matter that is not on the agenda. * indicates an agenda item for reporting only

2026/95	To elect a Chairman
2026/96	Open forum for members of the public.
2026/97	To approve the Minutes of the meeting held on 5 May and 7 April 2026.
2026/98	To receive declarations from Councillors as to the disclosable pecuniary and non-pecuniary interests in relation to any items on the agenda.
2026/99	Internal Audit Report:- (I) To receive and consider the Internal Auditor Report for 2025/2026 (II) To review and approve Section 1 "Annual Governance Statement 2025/2026 of the Annual Governance and Accountability Return (III) To review and approve Section 2 'Accounting Statements 2025/26 of the Annual Governance and Accountability Return (IV) To note the dates set for the period of the Exercise of Public rights
2026/100	To approve the Minutes of the meeting held on 5 May and 7 April 2026.salon
2026/101	To elect a vice-chairman.
2026/102	To appoint councillors/representatives to the following responsibilities and appointments: i. Cemetery ii. Conservation iii. Crime and Welfare iv. Finance v. Highways and Transport vi. Website vii. Newsletter viii. Planning ix. Strategic planning x. Marshalls Consultative Committee xi. Tree warden xii. Quy Fen Trust xiii. Responsible Financial Officer xiv. Marleigh Community Development Steering Group Representative
2026/103	Clerk's report and matters arising from the Minutes. Update on the insurance policy. Update on bus shelter repairs. Update on the grant application submitted to the Townlands Trust for pavilion refurbishment. Proposed date and organisation of the Fireworks event. Results of the RoSPA play area inspection. Update on Civil Enforcement Officer patrols for May Bumps.

2026/104	To consider following planning applications and tree works applications		
	26/01817/HFUL	52 High Street Fen Ditton Cam- bridgeshire CB5 8ST	Single storey front and rear extensions to the existing gar- age and single storey front extension to the dwelling
	26/0441/TTCA	Ditton Hall High Street Fen Ditton Cambridgeshire CB5 8ST	T1: Yew tree very close to house - Crown reduce by 2.5m to im- prove shape (a lesser reduction of 1m -1.5m on house side to give clearance from wall and roof but to not over-exaggerate imbalance of crown). Main reduction to include height as well as spread. To avoid further damage caused by squirrels.
2026/105	To receive reports from and questions to: County Councillor/s District Councillors		
2026/106	Review correspondence received and note any actions arising None.		
2026/107	To approve payments made during the month, accounts for payment, and authorise forthcoming payments:		
	NEST- Pension-DD Maximilian Huber		TBA
	NEST- Pension-DD Indira Hui Raha		TBA
	Clerk Salary – Maximilian Huber		TBA
	Clerk Salary (Parental Pay) – Indira Hui Raha		TBA
	Angela's Cleaning Service	Pavilion Cleaning	£80.00
	SCRIBE	Trust	£18.00
	SCRIBE	PC-DD	£67.20
	Hayden Woodruff	Bus shelter cleaning	£12.50
	Encore	Annual Service Charge	£2,027.36
	Heelis & Lodge	Internal Audit Fees	£350.00
	Unity Trust Bank	Service Charge	£7.00
2026/108	To approve payments made during the month from Equal's money pre-loaded card:		
	Ionos	07/05 Office Cloud Services	£4.80
	Open AI	08/05 Chat GPT	£16.67
	Asda	10/05 Sim Card Mobile Phone	£5.00
	Amazon	10/05 IT Equipment	£69.33
	LS Raspberry PI LTD	11/05 IT Equipment	£152.00
	Amazon	15/05 IT Equipment	£14.97
2026/109	To note money received: 08/05/2026 HMRC VAT Reclaim £1,090.25		
2026/110	Proposal to approve the revised Grant Policy (see Appendix A on website).		
2026/111	Proposal to approve the Memorial Bench Policy (see Appendix B on website).		
2026/112	Proposal to install a memorial bench on High Street in line with Policysalonsalon		
2026/113	Proposal to approve a new Data Protection Policy (see Appendix C on website).		
2026/114	Parish Councillors Committee report(s), (For Information Only) Newsletter/Website Cemetery Crime & Welfare Highways & Transport Strategic Planning Chairman Report		
2026/115	To accept notices and matters for the next agenda.		

Fen Ditton Parish Council

Voluntary and Community Sector Grants Policy

Draft v2.8 – for adoption

Adopted:	[date]
Minute ref:	[ref]
Review due:	[date]
Owner:	Parish Clerk / RFO

1. Purpose

Fen Ditton Parish Council (“the Council”) may award grants to support voluntary and community activity that delivers clear benefit to the Parish and its residents. The Council has limited funds and will apply this policy to ensure decisions are fair, transparent, and within legal powers.

A grant is a payment made by the Council to be used by an organisation for a specific purpose that benefits the Parish and which is not directly controlled or administered by the Council.

2. Legal Powers

The Council will award grants only where it is satisfied it has lawful power to do so. Depending on the purpose and recipient, relevant powers may include (but are not limited to):

- Local Government Act 1972 s137 (benefit to the area or inhabitants, within the statutory limit).
- Local Government (Miscellaneous Provisions) Act 1976 s19 (contributions to recreational facilities and related support).
- Other specific powers where applicable (e.g., community buildings or local amenities).

Where a specific power applies, the Council will normally use that in preference to s137.

3. Budget

An annual budget for grants will be agreed by the Council as part of the Council’s budget-setting process. The Council is not obliged to spend the full grants budget in any year.

4. Who can apply

4.1 Eligible applicants

Applications will be considered from not-for-profit organisations that can demonstrate benefit to Fen Ditton residents, including:

- Registered charities and CIOs.
- Community interest companies (asset-locked), charities’ trading subsidiaries (where appropriate), and other not-for-profit bodies.
- Unincorporated associations with a written constitution and proper management arrangements.
- Local branches of national charities/organisations where local benefit is demonstrated and funding is not reasonably available from the parent body.

4.2 Ineligible applicants

The Council will not normally consider applications from:

- Individuals (including ad-hoc groups without governance).
- Private businesses / profit-distributing entities.
- Organisations intending to support or oppose a political party.
- Applications that discriminate unlawfully (or that do not have appropriate equality safeguards).
- National/international charities where the benefit is not clearly local or where local need is not evidenced.

5. What we will fund

The Council may consider funding for:

- Capital projects (new / replacement / improvement of community facilities).
- Equipment and one-off costs for services/events that demonstrably benefit Fen Ditton residents.
- In exceptional cases only, limited revenue support where it is time-limited, clearly justified, and delivers defined outcomes.

The Council may fund up to a proportion of project costs. Where grants are sought as part of a larger fundraising package, the Council will require a credible funding plan and contingency.

6. What we will not fund

The Council will not normally fund:

- Costs already incurred (no retrospective grants).
- Projects that are principally the responsibility of another statutory body, unless there is a clear additional local benefit and lawful power.
- General fundraising appeals without a defined project/outcome.
- Activities primarily benefiting people outside Fen Ditton, unless a strong case for Parish benefit is demonstrated.

7. Special categories: faith groups, churches, and schools

7.1 Faith organisations / churches

Applications will be considered where a clear benefit to the wider community is demonstrated, irrespective of religious belief, and where the Council is satisfied the award is lawful. The Council may restrict awards to clearly community-facing purposes where appropriate.

7.2 Schools

Schools will normally only be supported for environmental/community-wide benefit projects, not core educational provision.

8. Grant bands and evidence requirements

8.1 Small grants (up to £350)

Evidence required:

- Completed application (basic sections).
- Latest accounts (or simple income/expenditure summary for small groups).
- One quote/estimate where relevant.

8.2 Standard and large grants (over £350)

Evidence required (as applicable to the size/risk of the grant):

- Governing document / constitution; aims and governance contacts.
- Latest annual accounts and recent bank statement(s).
- Detailed project plan, costs, quotes/estimates.
- Funding plan (including other funders) and contingency if full funding is not secured.
- Safeguarding policy where children/vulnerable adults are involved.
- For capital works: evidence of permission/consent where needed (e.g., landowner consent / leaseholder consent).

The £350 threshold is a Council-set administrative threshold and will be reviewed annually by resolution.

9. Assessment criteria (how decisions are made)

Applications will be assessed against:

1. Direct benefit to Fen Ditton residents.
2. Evidence of need and outcomes (who benefits, how many, measurable impacts).
3. Value for money and proportionality (including reserves/balances).
4. Applicant capability and governance.
5. Match funding / own fundraising where relevant.
6. Long-term sustainability for capital projects (maintenance / operating implications).
7. Previous grants from the Council and delivery/performance.

The Council may request further information or invite a representative to discuss the application.

10. Decision-making, conflicts, and transparency

- Grants are approved by Full Council (or a properly authorised committee) and recorded in minutes.
- Councillors must declare interests. Any councillor with a disclosable pecuniary interest or other relevant interest must not participate in the decision.
- The Council will publish awards in line with transparency requirements and its usual publication practice.

11. Conditions of grant (standard terms)

Unless varied by a written grant offer/letter, grants are subject to these conditions:

1. Use of funds: The grant must be used only for the agreed purpose. Any change requires prior written approval.
2. Unspent funds: Unspent funds must be returned at the end of the financial year unless an extension is granted in writing.
3. Monitoring: The recipient must provide an update/report and evidence of spend on request (and may be asked to report at the Annual Parish Meeting).
4. Withdrawal: If information is materially inaccurate or the project does not proceed as described, the Council may withdraw the grant and require repayment of unspent monies.
5. No future commitment: Awards do not create any expectation of future funding; a fresh application is required each year.
6. Recognition: The recipient must acknowledge Council support in publicity and, where appropriate for permanent assets, by a plaque or equivalent acknowledgment.

11.1 Repayment / clawback

The Council may require repayment (full or partial) where:

- the grant is not used for the approved purpose; or
- the project is abandoned; or
- the asset funded is disposed of or ceases to provide community benefit within a stated period (for example, 5 years), where this is proportionate and set out in the written grant offer.

Any clawback must be clearly stated in the Council's written grant offer.

12. Emergency / urgent grants

In exceptional circumstances (for example, an unforeseen urgent community need), the Council may consider an out-of-cycle grant or a grant that exceeds the budget, provided the decision is lawful, properly minuted, and within budget.

13. Timetable

The Council normally operates an annual cycle:

- January: The council decides on a budget for the next financial year including a total grant budget for the year.
- Small grant applications will be considered throughout the year on a monthly basis, subject to agenda capacity.
- Large grant applications will be considered in the order in which they are received, following the start of the financial year, subject to the availability of funds and the merits of each application.
- Approved grants will normally be made available to successful applicants in the month following approval, subject to any conditions imposed by the Council.

Approved grants must be taken up by 31 March following approval unless the Council agrees otherwise in writing.

14. Data protection

The Council will process personal data provided in applications for the purposes of administering the grants scheme, making decisions, paying grants, and meeting transparency/audit requirements. Applicants should refer to the Council's Privacy Notice.

15. Subsidy control (where relevant)

Where an applicant carries out potentially profitable activity, or is providing goods or services below market value, the Council will consider whether the award is capable of amounting to a subsidy and will apply any necessary checks/conditions.

Appendix A – Grant Application Form

Please complete all relevant sections and attach the supporting documents requested.

Question	Response
1. Applicant organisation: Name, address, web-site (if any)	
2. Main contact: Name, role, email, phone	
3. Legal status: Charity/CIO (number), CIC/Company (number), Unincorporated (attach constitution), Other	
4. About your organisation: Purpose/activities; number of members/users; % who are Fen Ditton residents	
5. Grant request: Amount requested from FDPC (£); + total project cost (£)	
6. Project description (plain English) and intended outcomes. Use an additional page if necessary.	
7. Who benefits (numbers; Fen Ditton focus) and where the project/service will take place	
8. Project costs: breakdown of costs (attach quotes/estimates where relevant)	
9. Funding plan: funding secured to date; other funding applied for (who/amount/status)	
10. Contingency plan if not fully funded	

11. Supporting documents (tick and attach): accounts; bank statements (for >£350); constitution; safeguarding policy (if applicable); permissions/consents (if applicable)	
12. Declarations: information is accurate; funds used only for approved purpose; agreement to monitoring/reporting and acknowledgment re- quirements	
13. Signed by two officers (e.g., Chair/Secret- ary/Treasurer): names, roles, signatures, date	

Submission: Email completed application and supporting documents to the Parish Clerk at:

clerk@fenditton-pc.gov.uk

Fen Ditton Parish Council

Draft Memorial Bench Policy – V1.0

Fen Ditton Parish Council

Memorial Bench Policy

Version 1.1

1. Purpose

This policy sets out the basis on which Fen Ditton Parish Council will consider requests for the installation of memorial benches on land owned or managed by the Council.

The Council recognises that memorial benches can provide a valued public amenity and a lasting tribute. At the same time, the Council must ensure that public open spaces are managed fairly, safely, consistently, and in the wider public interest.

Nothing in this policy creates any right to have a memorial bench installed, retained, or replaced. Each request will be considered on its merits and subject to the Council's discretion.

2. Scope

This policy applies to requests for memorial benches on land owned or managed by the Council.

It does not apply to:

- war memorials or civic memorials commissioned by the Council
- benches installed by developers under planning obligations
- temporary memorial items such as flowers, cards, or ornaments

3. General Principles

The Council will consider requests having regard to:

- the suitability of the proposed location
- the character and appearance of the site
- equality of treatment between applicants
- accessibility, safety, and maintenance requirements
- the cumulative number of memorial items in any one area
- the long-term management of Council land

The Council is under no obligation to provide or permit memorial benches.

Permission, if granted, is a personal permission only and does not grant any property right or exclusive use of the land.

4. Eligibility to Apply

Applications may be made by a family member, close friend, or other person with a clear connection to the person to be commemorated.

The Council may require the applicant to identify a named contact who will remain responsible for correspondence relating to the bench.

5. Locations

The number of suitable locations for memorial benches on Council land is very limited. The Council must balance commemorative requests against the need to protect the character of its open spaces, avoid visual clutter, preserve accessibility and ease of maintenance, and ensure that benches are provided primarily as a public amenity rather than as a memorial entitlement. Accordingly, not all requests can be accommodated, and the Council may decline an application even where a proposed location has personal significance to the applicant.

In deciding location, the Council may take into account:

- whether the site is suitable for a bench in planning and practical terms
- whether the bench would obstruct access, visibility, mowing, maintenance, or other operations
- whether the site is already over-provided with benches or memorials
- whether the site is environmentally sensitive
- whether the bench would be visually intrusive or inconsistent with the character of the area
- whether the location has a genuine public amenity value

The Council may refuse a requested location and instead offer an alternative location, or refuse the application altogether.

The Council may also determine that no further memorial benches will be allowed in a particular area.

6. Bench Type and Specification

Any approved bench must be of a design, size, material, colour, and finish approved by the Council.

Any approved bench must be of a type suitable for public outdoor use and must meet such current safety, durability and accessibility standards as the Council may reasonably require, including BS EN 581 and BS 8300 or any equivalent replacement standards.

The Council may require:

- a standard bench design
- a standard colour or finish
- a bench supplied by the Council's nominated contractor or preferred supplier
- compliance with accessibility, durability, and maintenance requirements

The bench must not include:

- ornamentation, features, or shapes not approved by the Council
- glass, loose items, solar lights, or other attachments
- vases, toys, wind chimes, fencing, stones, or similar memorial additions

The Council may reject any proposal that is unsuitable in design, appearance, durability, or maintenance terms.

7. Plaques and Inscriptions

Any plaque and inscription must be approved by the Council before installation.

As a general rule:

- wording must be brief, respectful, and non-contentious
- wording must not be political, defamatory, promotional, or offensive
- the size, material, font, and position of the plaque must be approved by the Council
- only one plaque will normally be permitted per bench

The Council reserves the right to require changes to wording or format before approval.

8. Application Process

Applications must be made in writing on the Council's application form or in such format as the Council may require.

An application should include:

- the name of the person to be commemorated
- the applicant's name and contact details
- the proposed wording for the plaque
- the preferred location, if any
- the reason for the request
- any other information the Council reasonably requires

Applications will be considered by the Council or by a committee or officer acting under delegated authority, as applicable.

The Council's decision shall be final.

9. Costs

The applicant will be responsible for such costs as the Council may determine, which may include:

- the cost of the bench
- the plaque
- delivery
- installation
- groundwork or foundations
- any inspection or administration fee
- any future agreed maintenance contribution, if applicable

The Council may require payment in full before any order is placed or installation arranged.

If the Council itself supplies and installs the bench, the bench shall remain the property of the Council once installed.

10. Ownership and Control

All benches installed on Council land under this policy shall remain, or become, the property of the Council once installed.

The Council shall retain full control over:

- the location
- installation method
- maintenance arrangements
- replacement
- temporary removal
- permanent removal
- disposal at the end of the memorial period or useful life

No person shall acquire any ownership or other legal interest in the bench or the land by reason of making payment or contributing to the bench.

11. Memorial Period

Approval for a memorial bench will normally be granted for a period of 10 years from the date of installation, unless the Council resolves otherwise.

At the end of that period, the Council may at its discretion:

- remove the plaque and retain the bench as a general public bench
- offer a renewal subject to the policy then in force
- remove and dispose of the bench if it has reached the end of its useful life or is no longer suitable

The Council is not obliged to renew any memorial arrangement.

The Council will use reasonable efforts to contact the applicant or the named contact before the end of the memorial period, but if it is unable to do so, it may proceed at its discretion.

12. Maintenance, Damage, and Replacement

The Council will inspect and maintain benches only to such extent as it considers appropriate, having regard to safety, condition, available resources, and the Council's general maintenance regime.

The Council does not guarantee:

- that a bench will remain in place indefinitely
- that a bench or plaque will not deteriorate
- that vandalism, theft, accidental damage, or weather damage will not occur
- that any damaged bench or plaque will be repaired or replaced

Where a bench or plaque becomes unsafe, badly worn, vandalised, or beyond economic repair, the Council may remove it without prior notice if necessary for safety reasons.

The Council may, but shall not be obliged to, offer the named contact the option to fund a replacement plaque or replacement bench on terms determined by the Council at that time.

13. Removal, Relocation, and Works

The Council reserves the right at any time to remove, relocate, replace, or alter a memorial bench if it reasonably considers this necessary for reasons including:

- health and safety
- maintenance
- site redesign or redevelopment
- changes in land use
- accessibility requirements
- anti-social behaviour or vandalism
- environmental or operational reasons
- compliance with law or best practice

Where reasonably practicable, the Council will seek to notify the named contact in advance, but it shall not be obliged to do so where urgent action is required.

14. No Additional Memorial Items

No flowers, wreaths, ornaments, photographs, statues, toys, candles, balloons, pebbles, or similar items may be left on, attached to, or placed around a memorial bench without the Council's prior written consent.

The Council may remove and dispose of any unauthorised items at its discretion.

15. Equality and Fairness

The Council will seek to apply this policy fairly and consistently.

Approval of one memorial bench does not create a precedent or obligation to approve another application in the same or any other location.

16. Data Protection

Personal data supplied in connection with an application will be processed by the Council in accordance with applicable data protection law and the Council's privacy arrangements.

17. Review of Policy

This policy will be reviewed from time to time and may be amended or withdrawn by the Council at any time.

Conditions to sit behind the policy

Application form declarations:

Applicant declaration

1. I have read and understood the Council's Memorial Bench Policy.
2. I understand that the Council is under no obligation to approve the application.
3. I understand that any bench installed on Council land will be under the Council's control and may be moved or removed in accordance with the policy.
4. I understand that the memorial arrangement does not grant any ownership right in the bench or land.
5. I agree to pay the costs required by the Council before installation.
6. I understand that the Council does not guarantee repair, replacement, or renewal.

Name

Signature

Address

Date

Fen Ditton Parish Council**Data Protection Policy***Draft for adoption / review*

Council	Fen Ditton Parish Council
Policy owner	The Clerk, with oversight by the Council
Data protection lead	The Clerk, unless the Council resolves otherwise
Adopted	[insert date]
Next review	[insert date, normally every 2 years or earlier if law or practice changes]
Version	Draft v1.0

Important note

This policy is intended to be a practical governance policy for a small parish council. It should be read with the Council's privacy notices, retention schedule, publication scheme, information security arrangements and any relevant contracts with IT, payroll, website, email, finance or cloud-service providers.

1. Purpose

Fen Ditton Parish Council is committed to handling personal data lawfully, fairly, securely and transparently. This policy explains how the Council will meet its obligations under the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 and related data protection legislation.

The purpose of this policy is to set clear expectations for councillors, the Clerk, employees, contractors, volunteers and others who handle personal data on behalf of the Council. It is intended to support consistent day-to-day practice and to reduce the risk of accidental disclosure, loss, misuse or unnecessary retention of personal data.

2. Scope

This policy applies to all personal data processed by or on behalf of Fen Ditton Parish Council, including personal data relating to:

residents, service users, complainants, correspondents and members of the public;
councillors, co-opted members, employees, job applicants, former employees, contractors and volunteers;
suppliers, grant applicants, hirers, tenants, trustees, community groups and other local organisations;
individuals shown in council records, photographs, CCTV images, audio recordings, correspondence, planning comments, financial records, personnel records, complaints files, meeting papers or email systems.

This policy applies whether the data is held electronically, in paper files, on portable devices, in email accounts, in cloud systems, on council-managed websites, in accounting or payroll systems, or by an approved processor acting for the Council.

3. Key definitions

Personal data: information relating to an identified or identifiable living individual. This can include names, addresses, email addresses, telephone numbers, photographs, identification numbers, online identifiers, opinions, complaints and other information that can identify a person either directly or indirectly.

Processing: anything done with personal data, including collecting, recording, storing, using, sharing, publishing, deleting, archiving or destroying it.

Special category data: more sensitive personal data, including information about health, racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, sex life, sexual orientation, genetic data and biometric data used for identification.

Criminal offence data: personal data relating to criminal convictions, offences, allegations, proceedings or related security measures.

Controller: the organisation that decides why and how personal data is processed. For most council business Fen Ditton Parish Council will be the controller.

Processor: a person or organisation that processes personal data on the Council's behalf and under the Council's instructions, such as an IT, payroll, email, website, accounting, cloud-storage or archiving provider.

Data subject: the living individual to whom personal data relates.

4. Roles and responsibilities

The Council is responsible for ensuring that personal data is processed in accordance with data protection law. The Council will make decisions about high-risk, unusual or sensitive processing where appropriate.

The Clerk is the Council's day-to-day data protection lead unless the Council has resolved otherwise. The Clerk is responsible for maintaining records of processing, coordinating responses to data subject rights requests, advising the Council on data protection issues, maintaining relevant policies and reporting serious incidents to the Council.

Councillors, employees, contractors and volunteers who handle council information must comply with this policy, follow the Council's procedures and seek advice from the Clerk if they are unsure how personal data should be handled.

The Council is not generally required to appoint a statutory Data Protection Officer solely because it is a parish council. If the Council's processing changes substantially, the Council will review whether specialist advice or a formally appointed Data Protection Officer is required.

5. Data protection principles

The Council will process personal data in line with the data protection principles. Personal data must be:

- processed lawfully, fairly and transparently;
- collected for specified, explicit and legitimate purposes;
- adequate, relevant and limited to what is necessary;
- accurate and, where necessary, kept up to date;
- kept for no longer than necessary, subject to lawful archiving and statutory retention requirements;
- processed securely, with appropriate technical and organisational measures;
- handled in a way that enables the Council to demonstrate accountability.

6. Lawful bases for processing

The Council will identify and record a lawful basis before processing personal data. The lawful bases most likely to be relevant to the Council are:

- legal obligation - for example audit, employment, tax, electoral, transparency, health and safety, local government and public records obligations;
- public task - where processing is necessary for the Council to perform its statutory functions or exercise official authority;
- contract - where processing is necessary to enter into or perform a contract, such as employment, supplier or hire arrangements;

legitimate interests - where appropriate for non-public-task activities, subject to balancing the Council's interests against the rights and freedoms of individuals;

vital interests - where processing is necessary to protect life or prevent serious harm;

consent - where the individual has a genuine choice and can withdraw consent.

The Council will not rely on consent where another lawful basis is more appropriate. Consent will not normally be used for statutory council functions, employment administration, audit, legal obligations or public task processing.

7. Special category and criminal offence data

The Council will process special category data only where both a UK GDPR lawful basis and an additional condition under data protection legislation are met. Examples may include employment administration, occupational health, equality monitoring, safeguarding, legal claims, substantial public interest or archiving in the public interest.

Criminal offence data will be processed only where lawful and necessary, for example where required for employment, safeguarding, legal proceedings, insurance, regulatory matters or the prevention or detection of unlawful acts.

Access to special category and criminal offence data will be limited to those who need it for an authorised council purpose. Such data must not be circulated more widely than necessary.

8. Transparency and privacy notices

The Council will provide clear privacy information explaining what personal data it collects, why it is used, the lawful basis, who it may be shared with, how long it is kept and how individuals can exercise their rights.

Privacy information may be provided through the Council's website, forms, application documents, recruitment documents, contract documentation, correspondence or specific notices for particular activities. Privacy notices must be reviewed when the Council introduces a new service, system, supplier or category of processing.

9. Records of processing and data audit

The Council will maintain a proportionate record of its main processing activities. This should identify, as far as practical for a small parish council:

the categories of personal data held;

the purposes and lawful bases for processing;

where the data is stored;

who has access to it;

who it is shared with;

the retention period or review trigger;

the main security measures used to protect it.

The Clerk will review the record of processing when significant systems or activities change, and at least as part of each scheduled policy review.

10. Collecting and using personal data

The Council will collect only the personal data it reasonably needs for a defined purpose. Forms, spreadsheets, correspondence templates and online systems should not request unnecessary information.

Personal data must be used only for the purpose for which it was collected, or for a compatible lawful purpose. If the Council wishes to use personal data for a new or significantly different purpose, the lawful basis and privacy information must be checked first.

Council officers and councillors should take particular care where personal data appears in meeting papers, minutes, agendas, planning responses, grant records, personnel records, complaint files or website material. Personal data should not be published unless publication is necessary, lawful and proportionate.

11. Publication, agendas and minutes

The Council is committed to openness and transparency, but transparency obligations do not remove the need to protect personal data. Before publishing agendas, minutes, reports, appendices, correspondence, photographs or other documents, the Council will consider whether personal data should be omitted, summarised, anonymised, redacted or considered in confidential session.

Where a matter can properly be described without naming individuals, the Council should normally do so. Personal data should be included in public papers only where it is necessary for the public to understand the decision, required by law, or otherwise justified and proportionate.

12. Data sharing

The Council may share personal data where lawful and necessary, including with:

statutory bodies, principal authorities, auditors, insurers, professional advisers and regulatory bodies; IT, email, website, accounting, payroll, banking, archiving, printing or cloud-service providers acting under contract; contractors or community partners where this is necessary to deliver a council function or service; law enforcement bodies or emergency services where legally required or necessary to protect individuals or public safety.

Where a third party processes personal data on behalf of the Council, the Council will ensure there is an appropriate written agreement requiring the processor to act only on the Council's instructions, keep data secure, support the Council with data rights and delete or return data at the end of the arrangement unless lawful retention applies.

13. Councillors and council business

Councillors may receive personal data when acting as members of the Council, when dealing with residents, or when taking part in council decisions. Personal data received for council purposes must be used only for council purposes and must be kept separate from party-political, personal or unrelated business wherever practical.

Councillors should use council-approved email accounts and storage for council business wherever available. Personal data should not be stored indefinitely in private email accounts, personal cloud storage, messaging apps or unmanaged devices. Where personal devices are used, they must be protected by appropriate passwords or biometric access, kept updated and not shared with unauthorised users.

Councillors must not disclose personal data to third parties, publish it online or forward it to personal contacts unless there is a lawful council purpose and appropriate authority to do so.

14. Security

The Council will apply proportionate technical and organisational measures to protect personal data. These measures may include:

using council-controlled email, storage and document management systems for council records; password protection, multi-factor authentication where available, and avoiding shared user accounts; limiting access to personal data to those who need it; keeping software, devices and anti-malware protection up to date; using encrypted or access-controlled transfer methods for sensitive information; locking away paper records and disposing of them securely; avoiding unnecessary local downloads or copies; checking recipient details before sending emails containing personal data;

using blind-copy or mailing-list tools where appropriate for group communications; reviewing supplier security before personal data is placed in a third-party system.

The level of security should reflect the sensitivity, volume and risk of the information. Personnel, payroll, complaints, legal, safeguarding, health, bank, disciplinary and special category data require particular care.

15. Email, messaging and correspondence

Email is a common source of data breaches. Anyone handling council personal data must take care to address emails correctly, avoid unnecessary attachments, use clear subject lines, and consider whether a password-protected attachment, secure link or other safer method is required for sensitive material.

Council business should not normally be conducted through informal personal messaging systems where records cannot be retained, searched, disclosed or securely managed. Where urgent or incidental use of a messaging service occurs, any substantive council record should be copied into the Council's normal records system as soon as practical.

16. Retention and disposal

The Council will keep personal data only for as long as it is needed for the purpose for which it is held, or for as long as is required for legal, audit, insurance, employment, contract, historic archive or public record reasons.

The Council should maintain a retention schedule covering the main categories of records it holds. Records should not be kept indefinitely simply because storage is available. However, records with permanent administrative, legal, financial, evidential or historical value may be retained where appropriate.

When personal data is no longer required, it must be deleted, destroyed, anonymised or archived in a controlled way. Paper records containing personal data should be shredded or placed in secure confidential waste. Electronic deletion should include removal from shared drives, local folders and redundant devices where practical.

17. Individual rights

Individuals have rights in relation to their personal data. Depending on the circumstances, these may include the right to:

- be informed about how their data is used;
- request access to their personal data;
- have inaccurate data corrected;
- request erasure of data;
- request restriction of processing;
- object to processing;
- request data portability where applicable;
- not be subject to solely automated decisions with legal or similarly significant effects, where applicable;
- complain to the Information Commissioner's Office.

These rights are not absolute. The Council may need to consider legal obligations, exemptions, third-party rights, public records, audit requirements, legal claims, confidentiality, safeguarding or other lawful reasons before deciding how to respond.

18. Subject access requests

A request by an individual for their own personal data is a subject access request. It does not have to mention data protection legislation or use any special wording. Requests may be made verbally or in writing.

Any councillor, employee, contractor or volunteer receiving a possible subject access request must pass it to the Clerk promptly. The Council will normally respond within one month of receipt, subject to any lawful extension, clarification, identity verification or exemption.

Before disclosing information, the Council will consider whether the records contain personal data about other individuals, legally privileged material, confidential references, management forecasts, negotiations, crime and taxation matters, regulatory material, or other information to which an exemption may apply. Redaction may be required.

19. Data breaches and incidents

A personal data breach means a breach of security leading to accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data. Examples include sending an email to the wrong person, losing a device or paper file, unauthorised access to an email account, accidental publication of personal data, malware, ransomware or failure by a processor.

Anyone who becomes aware of a suspected breach must report it to the Clerk immediately and preserve relevant evidence. The Clerk will record the incident, assess the risk, take containment steps and seek advice where required.

Where a breach is likely to result in a risk to the rights and freedoms of individuals, the Council will report it to the Information Commissioner's Office without undue delay and, where required, within 72 hours of becoming aware of it. Where a breach is likely to result in a high risk to individuals, the Council will also inform affected individuals without undue delay.

All breaches and near misses should be recorded, even where they are not reportable to the Information Commissioner's Office.

20. Data protection impact assessments

The Council will consider whether a Data Protection Impact Assessment is required before introducing processing that is likely to result in a high risk to individuals. Examples may include new CCTV or surveillance arrangements, large-scale publication or disclosure of personal data, significant new IT systems, systematic monitoring, or processing of sensitive data in new ways.

A Data Protection Impact Assessment should identify the purpose of the processing, the lawful basis, necessity and proportionality, risks to individuals, security measures, retention arrangements and steps to reduce risk.

21. CCTV, photographs and recordings

Where the Council uses CCTV, photographs, audio recordings or video recordings, it will ensure that the purpose, lawful basis, signage, access controls, retention period and disclosure arrangements are documented and proportionate.

Images of identifiable individuals are personal data. Photographs of children, vulnerable adults, employees, councillors or members of the public should be used only where lawful, necessary and appropriate. Consent may be needed where images are used for publicity and there is no other suitable lawful basis.

22. International transfers and cloud services

The Council will take reasonable steps to understand where its personal data is stored or accessed, including by cloud, email, website, payroll, finance, backup and IT support providers.

Personal data must not be transferred outside the UK unless the Council is satisfied that an appropriate legal mechanism, adequacy arrangement or other lawful safeguard applies. Supplier terms should be checked before new systems are adopted or sensitive personal data is uploaded.

23. Training and awareness

Councillors, employees and others who handle personal data for the Council should receive proportionate data protection awareness. This may include induction briefing, written guidance, refresher notes, agenda reminders, or targeted training for those handling sensitive or high-volume personal data.

Training and awareness should cover confidentiality, secure email use, publication risks, subject access requests, breach reporting, retention, use of personal devices and the handling of sensitive data.

24. Compliance, review and breach of policy

The Council will review this policy periodically and whenever there is a significant change in law, guidance, council systems, suppliers or processing activities.

Failure to follow this policy may result in council action, including withdrawal of access to systems or records, referral to the Council, contractual action, disciplinary action for employees, or referral to relevant authorities where appropriate.

Appendix A. Practical checklist for councillors, employees and volunteers

Use council email and council storage for council business wherever available.

Do not publish or forward personal data unless there is a clear council purpose and authority.

Check email recipients carefully before sending.

Use BCC or mailing-list tools for group emails unless all recipients have agreed to their addresses being visible.

Keep paper records secure and avoid taking them home unless necessary.

Do not keep personal data on personal devices longer than needed.

Report suspected breaches to the Clerk immediately.

Pass any request for personal data or deletion/correction of data to the Clerk promptly.

Do not include names, addresses, health details, complaints or employment matters in public reports unless necessary and lawful.

Ask before using photographs of identifiable individuals for publicity.

Appendix B. Suggested breach log fields

Field	Details to record
Date/time discovered	When the Council became aware of the incident.
Reporter	Who reported it and to whom.
Description	What happened, including systems, records or papers involved.
Data affected	Types of personal data and approximate number of people affected.
Containment	Immediate steps taken to recover, block, delete, recall, secure or limit further disclosure.
Risk assessment	Likely impact on individuals and whether the breach is reportable.
ICO notification	Whether notified, date/time, reference and reason if not notified.
Individuals notified	Whether affected individuals were notified and what they were told.
Lessons learned	Policy, training, technical or contractual changes required.