#### 6. GODALMING AND FARNCOMBE NEIGHBOURHOOD PLAN (GoFarNP)

As members will be aware, Waverley Borough Council, as the local planning authority, designated a Neighbourhood Area for the whole of Godalming parish in July 2013 to enable Godalming Town Council to prepare the GoFarNP.

In October 2013, Godalming Town Council agreed to promote and resource the GoFarNP process for Godalming and Farncombe and engaged professional planning consultants to assist with the process. Utilising the resources provided by Godalming Town Council, the GoFarNP has been prepared by the community through the GoFarNP Group.

On the 12 February, a Parish Environmental Baseline Statement and 'Application for a Screening opinion as to whether a strategic environmental assessment (SEA) is required for a Neighbourhood Development Plan' was submitted to Waverley Borough Council. The outcome of this application should take approximately 6 weeks and will be a determining factor on the pathway for the submission of the GoFarNP to Waverley Borough Council under Regulation 16.

However, prior to the Regulation 16 stage, The Godalming & Farncombe Neighbourhood Plan 2017–2032 (attached for the information of Members) is required to undergo presubmission consultation and publicity (Regulation 14 Consultation). This is a formal process and must meet certain requirements, which are detailed below along with how these requirements are to be met.

"Regulation 14. The Neighbourhood Planning (General) Regulations 2012

## Pre-submission consultation and publicity

- 14. Before submitting a plan proposal to the local planning authority, a qualifying body must:
  - (a) publicise, in a manner that is likely to bring it to the attention of people who live, work or carry on business in the neighbourhood area:
    - (i) details of the proposals for a neighbourhood development plan;

The Godalming and Farncombe neighbourhood plan group has prepared a comprehensive Neighbourhood Plan entitled 'Godalming and Farncombe Neighbourhood Plan 2017-2032'. The plan covers issues including Housing, Economy, Heritage & Design, Transport and Movement, Environment and Community & Infrastructure, amongst others. Please refer to the Neighbourhood Plan document for further details.

- (ii) details of where and when the proposals for a neighbourhood development plan may be inspected;
  - Online at www.godalming-tc.gov.uk/neighbourhoodplan
  - Electronic copies can be obtained by email request to <u>office@godalming-tc.gov.uk</u>
  - Hard copies of the plan can be viewed at:
    - Godalming Library, Bridge Street, Godalming, GU7 1HT. Mon, Wed, Thur & Fri 09.30 – 17.30. Tue 09.30 – 19.00. Sat 09.30 – 17.00
    - Godalming Museum, Tue Sat 10.00 16.00

- (iii) details of how to make representations;
  - By Web site: Representations can be made via the website using the Neighbourhood Plan feedback form
  - o By email to: office@godalming-tc.gov.uk
  - By mail to: Godalming Town Council, Municipal Buildings, Bridge Street, Godalming, Surrey, GU7 1HT
- (iv) the date by which those representations must be received, being not less than 6 weeks from the date on which the draft proposal is first publicised;

Please submit representations by 12.00 on Monday, 11 June 2018

(b) consult any consultation body referred to in paragraph 1 of Schedule 1 whose interests the qualifying body considers may be affected by the proposals for a neighbourhood development plan;

The following bodies will be informed of the GoFarNP and invited to comment.

Surrey County Council **Guildford Borough Council Busbridge Parish Council** Witley Parish Council **Compton Parish Council Shalford Parish Council** NHS Guildford & Waverley Clinical Commissioning Group Network Rail Infrastructure Limited (company number 2904587) The Highways Agency **Natural England** The Environment Agency **English Heritage Homes England Godalming & District Chamber of Commerce Churches Together in Godalming** Go Godalming Association **Godalming Together CiC** Farncombe Initiative

(c) send a copy of the proposals for a neighbourhood development plan to the local planning authority.

An electronic copy, followed by a hard copy will be sent to Mr Ian Motuel, Neighbourhood Planning Officer, Planning Department, Waverley Borough Council.

In order to progress to Regulation 14 consultation, it is necessary for Godalming Town Council, as the 'authorised body' to adopt the Godalming and Farncombe Neighbourhood Plan 2017–2032. As such, Members are requested to consider the GoFarNP and, if agreed, to recommend the adoption of the plan to Full Council on 22 March 2018.

## 7. POLICY & MANAGEMENT COMMITTEE – WORK PROGRAMME

TASK	WHO?	MINUTE REF	PROGRESS	Requirement	Due date
COMMUNITY CENTRES – PERFORMANCE MONITORING	Town Clerk	46-16	On-going item for approximately quarterly reporting.	Quarterly	12 April 2018
ANNUAL REVIEW OF FINANCIAL REGULATIONS	Town Clerk & Acting RFO	Annual Event	To be completed annually by 31 March Reviewed by Audit Committee for Recommendation to Full Council. NB. This item was a relevant standing item for this committee when Audit was sub-committee of P&M. As a full committee Audit now reports directly to Full Council, therefore it is recommended this item be removed from P&M work programme.	Annually	31 March 2018
FARNCOMBE INITIATIVE	Cllr Cosser	274-13	Reports expected at approximately six-monthly intervals.	Bi-annual	12 April 2018
FLOOD ALLEVIATION	Acting Town Clerk	405-13 428-14	Full Council signed a Memorandum of Understanding with other agencies and created a £25,000 earmarked reserve for a future Flood Alleviation scheme and, contribution of land.	N/A	Construction Due to begin mid 2018
COMMUNICATIONS WORKING GROUP	Cllr Reynolds		Report received October 2017 – Communications Officer's Post Established 01 Feb 2017. Comms Officer to submit draft Comms strategy/policy document to Comms Working Group.		October 2018
DEVOLUTION OF SERVICES FROM PRINCIPAL AUTHORITIES	Acting Town Clerk	46-16	Tenancy at Will for public toilets signed and toilets re-opened on 15 November. Solicitors appointed for completion of lease(s)	N/A	Draft Lease to P&M 1 March 2018
WW1 2018 (INC GODALMING WAR MEMORIAL)	Acting Town Clerk	46-16	Meeting to be held before end Mar to scope 2018 Remembrance. Order placed with mason for new memorial plaques		11/11/2018
FIREWORKS	Acting Town Clerk	173-16	Preparations for 2018 event underway	Annual	12 July 2018
CONDITION OF TREES IN THE TOWN COUNCIL'S OWNERSHIP	Acting Town Clerk	414-16	Next report due Nov 2018	2 yearly	Nov 2018

TASK	WHO?	MINUTE REF	PROGRESS	Requirement	Due date
INVESTMENT STRATEGY	Finance Administrator	N/A	Financial Regulation (8.4) identifies the need for an Investment Strategy & Policy. To be reviewed post outcome of Business development Working Group		Dec 2018
APPROVAL OF VARIABLE DIRECT DEBITS	Acting RFO	N/A	Financial Regulations (6.6) require the approval of a use of variable direct debit shall be renewed by this Committee at least every two years.	25/05/17	25/05/19
ENGAGEMENT OF INTERNAL AUDIT	Acting RFO	N/A	Standing Orders delegates the annual appointment of the Internal Auditor to this Committee. Appointment of Internal Auditors for 2018/19 approved by Full Council on 16 Nov 17.	Annual	Jan 2019
REPRESENTATION ON EXTERNAL BODIES REPORTS:				Required Date	Revised Date
Sport Godalming	Cllr P Martin	51-16	Report provided	25/05/17	
Godalming/Joigny Friendship Association	Cllr Hunter	81-15	Report provided.	25/05/17	
Godalming/Mayen Association	Cllr Thornton	51-16	Report provided.	13/07/17	
Waverley Citizens' Advice	Cllr S Bott	51-16	Presentation by CAB on 14 Sept	13/07/17	
Godalming Transportation Task Group (SCC)	Cllr Walden Cllr Bolton	51-16	No report as no meetings of the Godalming Transportation Task Group have been held.	07/09/17	
Godalming & District Chamber of Commerce	Cllr Poulter	51-16	Report provided	07/09/17	
Go Godalming Association	Cllr Gordon- Smith	51-16	Report provided	19/10/17	

Holloway Hill Sports Association	Cllr T Martin	51-16	Report provided	19/10/17	
Godalming Museum Trust	Cllr Gordon- Smith	51-16	Report provided	30/11/17	
St Mark's Community Centre Management Committee	Cllr Pinches	51-16	Report deferred to 12 July 2018	30/11/17	
St Mark's Community Initiative Group	Cllr Bolton	51-16	Report provided	18/01/18	
Godalming Together CIC	Cllr Purkiss	51-16	Report provided	18/01/18	
SALC	Cllr Cosser	51-16	Report expected 1 March 2018	01/03/18	
SCC – Tree Wardens	Cllr Williams	51-16	Report expected 1 March 2018	01/03/18	
Waverley Cycle Forum	Cllr Purkiss		Report expected 12 April 2018	12/04/18	12/07/18
District Scout Council	Cllr Wheatley		Report expected (TBC)	TBC	12/07/18
Fairtrade Steering Group	Cllr Wheatley		Report expected (TBC)	TBC	
Farncombe Day Centre	Cllr Gray		Report expected (TBC)	TBC	

# **Key Dates for Members' Information (Town Events etc.)**

Event	Date
Farmers' Market	Saturday, 29 April 2017
St John's Spring Fair	Saturday, 29 April 2017
Annual Council/Mayor Making	Thursday, 11 May 2017
Godalming Run	Sunday, 14 May 2017
Farmers' Market	Saturday, 27 May 2017
Town Show & Carnival	Saturday, 3 June 2017
Mayor's Civic Service	Sunday, 11 June 2017
Farmers' Market	Saturday, 24 June 2017
Summer Food Festival	Saturday, 1 July 2017
Farmers' Market	Saturday, 29 July 2017
Staycation	Saturday, 5–Sunday, 13 August 2017
Farmers' Market	Saturday, 26 August 2017
Farmers' Market	Saturday, 23 September 2017
Farmers' Market	Saturday, 28 October 2017
Godalming Fireworks (TBC)	Friday, 3 November 2017
Remembrance Sunday	Sunday, 12 November 2017
Christmas Festival & Light Switch-On	Saturday, 25 November 2017
Blessing of the Crib and Carol Service	Saturday, 9 December 2017
Farmers' Market	Saturday, 31 March 2018
Mayor's Pancake Races (not running 2018 – Shrove Tues in School hols)	Tuesday, 13 February 2018
Annual Town Meeting	Thursday, 19 April 2018
St John's Spring Fair	Saturday, 28 April 2018
Farmers' Market	Saturday, 28 April 2018
Annual Council/Mayor Making	Thursday, 10 May 2018

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## Detailed Income & Expenditure by Year to Date Budget Heading 28/02/2018

		Current Mth Actual	Current Mnth Budget	Current Mnth Variance	Year to Date Actual	Year to Date Budget	Year to Date Variance	Total Annual Budget	Committed Expenditure	Funds Available
Policy	& Management									
<u>101</u>	Head Office Costs									
5101	Contrib. to Premises Provision	0	0	0	1,600	1,600	0	1,600		(
5102	Contrib. to Other Provisions	0	0	0	23,186	23,186	0	23,186		(
	Head Office Costs :- Expenditure	0	0	0	24,786	24,786		24,786	0	
4001	Salaries	11,765	12,052	287	120,687	132,572	11,885	144,618		23,93 <sup>-</sup>
4002	Employer's NIC	1,239	1,418	179	12,771	15,598	2,827	17,011		4,24
4003	Employer's Superannuation	2,068	2,217	149	21,368	24,387	3,019	26,599		5,23
4005	Agency Staff	0	0	0	1,395	0	-1,395	0		-1,39
4011	Staff Training	0	222	222	1,771	2,442	671	2,669		89
4012	Recruitment Advertising	0	0	0	0	0	0	1,500		1,50
4013	Other Staff Expenses	0	0	0	30,000	30,000	0	30,100		10
4101	Repair/Alteration of Buildings	0	0	0	0	500	500	695		69
4102	Property Maintenance	0	0	0	150	55	-95	55		-9
4121	Rents	0	0	0	0	0	0	13,000		13,00
4161	Cleaning	0	0	0	53	53	1	53		
4162	Waste Removal	0	0	0	60	60	0	60		
4163	Domestic Supplies	0	3	3	34	41	8	43		1
4201	Public Transport	0	0	0	16	16	0	16		
4202	Car Allowances	19	0	-19	389	750	361	1,000		61
4301	Equipment	0	0	0	218	250	32	450		23
4304	Catering	0	17	17	165	187	22	200		(

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## Detailed Income & Expenditure by Year to Date Budget Heading 28/02/2018

		Current Mth Actual	Current Mnth Budget	Current Mnth Variance	Year to Date Actual	Year to Date Budget	Year to Date Variance	Total Annual Budget	Committed Expenditure	Funds Available
4305	Clothes, Uniform & Laundry	0	0	0	25	100	75	200		175
4306	Printing	0	223	223	3,325	2,453	-872	2,673		-652
4307	Stationery	0	226	226	1,943	2,486	543	2,709		766
4313	Professional Fees - Other	300	830	530	2,856	9,130	6,274	10,000		7,144
4314	Audit Fees	0	0	0	1,853	2,000	147	2,000		147
4315	Insurance	0	0	0	8,191	8,191	0	8,191		0
4321	Bank Charges	27	67	40	627	737	110	800		173
4322	Postage	0	0	0	1,103	1,500	397	2,000		897
4323	Telephones	0	134	134	1,646	1,474	-172	1,609		-37
4325	Computing	501	688	187	8,402	7,568	-834	8,260		-142
4326	Website	0	0	0	0	0	0	1,000		1,000
4327	Publicity Advertising	0	0	0	300	300	0	300		0
4331	Newsletter	1,100	0	-1,100	4,950	3,850	-1,100	5,500		550
4341	Grants	2,019	0	-2,019	54,250	55,000	750	55,000		750
4342	Subscriptions	0	392	392	3,740	4,312	572	4,705		965
4401	Payments to Godalming JBC	0	0	0	61,696	61,696	0	61,696		0
4900	Miscellaneous Expenses	0	0	0	52	1,000	948	1,500		1,448
6000	Debt Charges - Principal	4,515	4,560	45	21,201	21,250	49	21,250		49
6001	Debt Charges - Interest	6,773	6,775	2	31,211	31,220	9	31,220		9
	Head Office Costs :- Expenditure	30,327	29,824	-503	396,447	421,178	24,731	458,682		62,235
1001	Precept	0	0	0	570,896	570,896	0	570,896		
1202	Grants - WBC	0	0	0	9,780	9,780	0	9,780		
1303	Other customer/client receipts	0	0	0	60	60	0	60		
1401	Interest Received	0	175	-175	36	700	-664	0		

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## Detailed Income & Expenditure by Year to Date Budget Heading 28/02/2018

		Current Mth Actual	Current Mnth Budget	Current Mnth Variance	Year to Date Actual	Year to Date Budget	Year to Date Variance	Total Annual Budget	Committed Expenditure	Funds Available
1501	Recharges to Godalming JBC	0	0	0	27,000	27,000	0	27,000		
	Head Office Costs :- Income	0	175	-175	607,772	608,436	-664	607,736		
	Net Expenditure over Income	30,327	29,649	-678	-186,539	-162,472	24,067	-124,268		
102	2 Civic Expenses									
5001	Transfers from Reserves	0	0	0	0	0	0	-4,275		-4,27
5102	Contrib. to Other Provisions	0	0	0	4,000	4,000	0	4,000		
	Civic Expenses :- Expenditure	0	0	0	4,000	4,000	0	-275	0	-4,27
4005	Agency Staff	0	0	0	150	0	-150	0		-15
4203	Other Transport Costs	0	0	0	171	0	-171	0		-17
4301	Equipment	0	0	0	264	0	-264	0		-26
4304	Catering	0	0	0	306	251	-55	251		-5
4305	Clothes, Uniform & Laundry	0	0	0	486	474	-12	474		-1
4306	Printing	0	0	0	39	400	361	800		76
4313	Professional Fees - Other	0	444	444	5,072	4,884	-188	5,325		25
4322	Postage	0	0	0	11	11	0	11		
4332	Mayor's Expenses	0	0	0	5,670	2,000	-3,670	8,080		2,41
4333	Members' Expenses	0	42	42	0	462	462	500		50
4900	Miscellaneous Expenses	0	68	68	562	748	186	812		25
	Civic Expenses :- Expenditure		554	554	12,732	9,230	-3,502	16,253	0	3,52
1304	Donations	0	0	0	125	125	0	125		
	Civic Expenses :- Income	0	0	0	125	125	0	125		
	Net Expenditure over Income		554	554	16,607	13,105	-3,502	15,853		

## Detailed Income & Expenditure by Year to Date Budget Heading 28/02/2018

		Current Mth Actual	Current Mnth Budget	Current Mnth Variance	Year to Date Actual	Year to Date Budget	Year to Date Variance	Total Annual Budget	Committed Expenditure	Funds Available
<u>104</u>	Town Promotion									
5001	Transfers from Reserves	0	0	0	-4,298	-4,312	-14	-4,312		-14
5102	Contrib. to Other Provisions	0	0	0	0	0	0	586		586
	Town Promotion :- Expenditure	0	0	0	-4,298	-4,312	-14	-3,726	0	572
4102	Property Maintenance	0	0	0	4,766	0	-4,766	0		-4,766
4162	Waste Removal	0	0	0	212	212	0	212		0
4203	Other Transport Costs	0	0	0	167	166	-1	166		-1
4301	Equipment	0	0	0	4,425	4,426	1	4,426		1
4313	Professional Fees - Other	0	0	0	40	40	0	40		0
4327	Publicity Advertising	28	0	-28	554	0	-554	0		-554
4900	Miscellaneous Expenses	0	0	0	14	14	0	14		0
	Town Promotion :- Expenditure	28	0	-28	10,178	4,858	-5,320	4,858	0	-5,320
1303	Other customer/client receipts	0	0	0	1,484	1,483	1	1,483		
1304	Donations	13,000	0	13,000	13,000	0	13,000	0		
	Town Promotion :- Income	13,000	0	13,000	14,484	1,483	13,001	1,483		
	Net Expenditure over Income	-12,972	0	12,972	-8,604	-937	7,667	-351		
105	Staycation									
5001	Transfers from Reserves	0	0	0	-1,500	-1,500	0	-1,500		0
	Staycation :- Expenditure	0	0	0	-1,500	-1,500		-1,500		0

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## Detailed Income & Expenditure by Year to Date Budget Heading 28/02/2018

		Current Mth Actual	Current Mnth Budget	Current Mnth Variance	Year to Date Actual	Year to Date Budget	Year to Date Variance	Total Annual Budget	Committed Expenditure	Funds Available
4005	Agency Staff	0	0	0	150	150	0	150		0
4203	Other Transport Costs	0	0	0	196	196	0	196		0
4304	Catering	0	0	0	6	0	-6	0		-6
4306	Printing	0	0	0	27	0	-27	0		-27
4313	Professional Fees - Other	0	0	0	785	785	0	785		0
4327	Publicity Advertising	0	0	0	3,783	3,783	0	3,783		0
4900	Miscellaneous Expenses	0	0	0	260	260	0	260		0
	Staycation :- Expenditure	0	0	0	5,207	5,174	-33	5,174	0	-33
	Net Expenditure over Income	0	0	0	3,707	3,674	-33	3,674		
106	Festivals & Markets									
4001	Salaries	0	0	0	1,600	1,600	0	1,600		0
4002	Employer's NIC	0	0	0	137	140	3	140		3
4005	Agency Staff	0	0	0	50	320	270	320		270
4162	Waste Removal	0	0	0	466	562	96	562		96
4202	Car Allowances	0	0	0	19	0	-19	0		-19
4203	Other Transport Costs	0	0	0	122	300	178	300		178
4301	Equipment	0	0	0	281	607	326	607		326
4304	Catering	0	0	0	185	192	7	192		7
4313	Professional Fees - Other	0	0	0	2,472	2,090	-382	2,090		-382
4327	Publicity Advertising	0	0	0	3,182	3,068	-114	3,618		436
4343	Licensing/PRS	220	0	-220	900	110	-790	110		-790
4900	Miscellaneous Expenses	0	0	0	352	414	62	414		62
	Festivals & Markets :- Expenditure	220	0	-220	9,766	9,403	-363	9,953	0	187

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## Detailed Income & Expenditure by Year to Date Budget Heading 28/02/2018

		Current Mth Actual	Current Mnth Budget	Current Mnth Variance	Year to Date Actual	Year to Date Budget	Year to Date Variance	Total Annual Budget	Committed Expenditure	Funds Available
1303	Other customer/client receipts	0	0	0	15,819	16,070	-251	16,070		
1304	Donations	0	0	0	130	0	130	0		
	Festivals & Markets :- Income	0	0	0	15,949	16,070	-121	16,070		
	Net Expenditure over Income	220	0	-220	-6,184	-6,667	-483	-6,117		
108	Christmas Lights									
5001	Transfers from Reserves	0	0	0	0	-3,680	-3,680	-3,680		-3,680
	Christmas Lights :- Expenditure	0	0	0	0	-3,680	-3,680	-3,680	0	-3,680
4301	Equipment	0	0	0	420	0	-420	0		-420
4313	Professional Fees - Other	0	0	0	41,667	45,880	4,213	45,880		4,213
	Christmas Lights :- Expenditure	0	0	0	42,087	45,880	3,793	45,880	0	3,79
1304	Donations	0	0	0	3,200	3,200	0	3,200		
	Christmas Lights :- Income	0	0	0	3,200	3,200	0	3,200		
	Net Expenditure over Income	0	0	0	38,887	39,000	113	39,000		
109	Fireworks Night									
4001	- Salaries	0	0	0	0	250	250	250		250
4005	Agency Staff	0	0	0	1,150	1,245	95	1,245		9:
4162	Waste Removal	0	0	0	85	84	-1	84		-
4202	Car Allowances	0	0	0	6	0	-6	0		_

## Detailed Income & Expenditure by Year to Date Budget Heading 28/02/2018

		Current Mth Actual	Current Mnth Budget	Current Mnth Variance	Year to Date Actual	Year to Date Budget	Year to Date Variance	Total Annual Budget	Committed Expenditure	Funds Available
4203	Other Transport Costs	0	0	0	216	259	43	259		43
4301	Equipment	0	0	0	1,026	688	-338	688		-338
4313	Professional Fees - Other	0	0	0	8,413	7,705	-708	7,705		-708
4315	Insurance	0	0	0	1,000	1,000	0	1,000		0
4327	Publicity Advertising	0	0	0	1,530	1,450	-80	1,450		-80
4343	Licensing/PRS	0	0	0	155	155	0	155		0
4900	Miscellaneous Expenses	0	0	0	240	690	450	690		450
	Fireworks Night :- Expenditure	0	0	0	13,820	13,526	-294	13,526	0	-294
1303	Other customer/client receipts	0	0	0	10,424	11,653	-1,229	11,653		
1304	Donations	0	0	0	210	0	210	0		
	Fireworks Night :- Income	0	0	0	10,634	11,653	-1,019	11,653		
	Net Expenditure over Income	0	0	0	3,186	1,873	-1,313	1,873		
111	1 Neighbourhood Plan									
5001	Transfers from Reserves	0	0	0	0	0	0	-4,843		-4,843
	Neighbourhood Plan :- Expenditure	0	0	0	0		0	-4,843		-4,843
4313	Professional Fees - Other	0	0	0	4,843	0	-4,843	4,843		0
	Neighbourhood Plan :- Expenditure	0	0	0	4,843	0	-4,843	4,843	0	0
	Net Expenditure over Income	0	0	0	4,843		-4,843			

## Detailed Income & Expenditure by Year to Date Budget Heading 28/02/2018

		Current Mth Actual	Current Mnth Budget	Current Mnth Variance	Year to Date Actual	Year to Date Budget	Year to Date Variance	Total Annual Budget	Committed Expenditure	Funds Available
<u>201</u>	BWP Community Centre									
5101	Contrib. to Premises Provision	0	0	0	3,000	3,000	0	3,000		0
	BWP Community Centre :- Expenditure	0	0	0	3,000	3,000		3,000	0	0
4001	Salaries	0	840	840	8,425	9,240	815	10,077		1,652
4002	Employer's NIC	0	82	82	826	902	76	985		159
4003	Employer's Superannuation	0	152	152	1,512	1,672	160	1,830		318
4101	Repair/Alteration of Buildings	0	117	117	0	1,287	1,287	1,409		1,409
4102	Property Maintenance	0	0	0	386	386	0	386		0
4103	Maintenance Contracts	0	0	0	918	918	0	918		0
4111	Energy Costs	105	275	170	2,713	3,025	312	3,300		587
4131	Rates	0	0	0	1,258	1,258	0	1,258		0
4141	Water Services	54	0	-54	663	600	-63	771		108
4161	Cleaning	0	560	560	5,050	6,160	1,110	6,719		1,669
4162	Waste Removal	66	39	-27	587	429	-158	470		-117
4163	Domestic Supplies	23	10	-13	148	110	-38	124		-24
4171	Grounds Maintenance Costs	0	126	126	2,693	3,060	367	3,194		501
4181	Premises Insurance	0	0	0	950	950	0	950		0
4301	Equipment	0	29	29	72	319	247	352		280
4306	Printing	0	4	4	0	44	44	44		44
4323	Telephones	49	38	-11	539	418	-121	450		-89
4324	Broadband	36	37	1	411	407	-4	444		33
4343	Licensing/PRS	0	0	0	223	280	57	280		57
	BWP Community Centre :- Expenditure	333	2,309	1,976	27,375	31,465	4,090	33,961		6,586

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## Detailed Income & Expenditure by Year to Date Budget Heading 28/02/2018

		Current Mth Actual	Current Mnth Budget	Current Mnth Variance	Year to Date Actual	Year to Date Budget	Year to Date Variance	Total Annual Budget	Committed Expenditure	Funds Available
1301	Premises Hire Charges	0	2,417	-2,417	26,812	26,587	225	29,000		
	BWP Community Centre :- Income	0	2,417	-2,417	26,812	26,587	225	29,000		
	Net Expenditure over Income	333	-108	-441	3,563	7,878	4,315	7,961		
202	Pepperpot Pepperpot									
5101	Contrib. to Premises Provision	0	0	0	2,000	2,000	0	2,000		0
	Pepperpot :- Expenditure	0		0	2,000	2,000		2,000	0	0
4102	Property Maintenance	0	161	161	2,293	1,771	-522	1,927		-366
4103	Maintenance Contracts	0	114	114	1,449	1,254	-195	1,363		-86
4111	Energy Costs	30	64	34	757	704	-53	770		13
4121	Rents	0	0	0	2,400	2,170	-230	2,170		-230
4131	Rates	0	0	0	641	641	0	641		0
4161	Cleaning	0	261	261	2,331	2,871	540	3,132		801
4171	Grounds Maintenance Costs	0	0	0	627	627	0	627		0
4181	Premises Insurance	0	0	0	220	220	0	220		0
4301	Equipment	0	0	0	6	0	-6	800		794
4323	Telephones	52	50	-2	554	550	-4	600		46
4324	Broadband	36	37	1	408	407	-1	440		32
4343	Licensing/PRS	0	0	0	70	70	0	70		0
4900	Miscellaneous Expenses	0	0	0	15	15	0	15		0
	Pepperpot :- Expenditure	118	687	569	11,771	11,300	-471	12,775	0	1,004
1301	Premises Hire Charges	0	899	-899	9,306	9,889	-583	10,791		

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## Detailed Income & Expenditure by Year to Date Budget Heading 28/02/2018

		Current Mth Actual	Current Mnth Budget	Current Mnth Variance	Year to Date Actual	Year to Date Budget	Year to Date Variance	Total Annual Budget	Committed Expenditure	Funds Available
1303	Other customer/client receipts	0	0	0	1,260	1,260	0	1,260		
	Pepperpot :- Income	0	899	-899	10,566	11,149	-583	12,051		
	Net Expenditure over Income	118	-212	-330	3,205	2,151	-1,054	2,724		
<u>203</u>	The Square									
4181	Premises Insurance	0	0	0	575	575	0	575		0
	The Square :- Expenditure	0	0	0	575	575		575	0	0
1302	Rents	0	0	0	0	0	0	3,000		
1303	Other customer/client receipts	0	0	0	575	575	0	575		
	The Square :- Income	0	0	0	575	575	0	3,575		
	Net Expenditure over Income	0	0	0	0	0	0	-3,000		
204	Allotments									
5001	Transfers from Reserves	0	0	0	-4,500	-4,500	0	-4,500		0
5101	Contrib. to Premises Provision	0	0	0	1,000	1,000	0	1,000		0
	Allotments :- Expenditure	0	0	0	-3,500	-3,500	0	-3,500	0	0
4141	Water Services	4	0	-4	33	34	1	79		46
4162	Waste Removal	0	0	0	297	297	0	297		0
4171	Grounds Maintenance Costs	0	636	636	7,111	6,996	-115	7,631		520
4303	Materials	0	0	0	125	125	0	125		0
	Allotments :- Expenditure	4	636	632	7,566	7,452	-114	8,132	0	566

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## Detailed Income & Expenditure by Year to Date Budget Heading 28/02/2018

		Current Mth Actual	Current Mnth Budget	Current Mnth Variance	Year to Date Actual	Year to Date Budget	Year to Date Variance	Total Annual Budget	Committed Expenditure	Funds Available
1302	Rents	0	0	0	2,197	2,197	0	2,197		
	Allotments :- Income	0	0	0	2,197	2,197	0	2,197		
	Net Expenditure over Income	4	636	632	1,870	1,755	-115	2,435		
<u>205</u>	Wilfrid Noyce Community Centre									
5101	Contrib. to Premises Provision	0	0	0	2,000	2,000	0	2,000		0
5102	Contrib. to Other Provisions	0	0	0	2,083	2,083	0	2,083		0
Wilfrid	Noyce Community Centre :- Expenditure	0	0	0	4,083	4,083	0	4,083		0
4001	Salaries	224	216	-8	2,390	2,376	-14	2,596		206
4005	Agency Staff	0	0	0	100	0	-100	292		192
4101	Repair/Alteration of Buildings	0	113	113	0	1,243	1,243	1,356		1,356
4102	Property Maintenance	0	159	159	5,339	1,749	-3,590	1,910		-3,429
4103	Maintenance Contracts	0	236	236	2,879	2,596	-283	2,837		-42
4111	Energy Costs	217	500	283	3,409	5,500	2,091	6,000		2,591
4121	Rents	0	0	0	450	151	-299	151		-299
4131	Rates	0	0	0	4,334	4,334	0	4,334		0
4141	Water Services	202	103	-99	1,675	1,133	-542	1,235		-440
4161	Cleaning	0	1,071	1,071	10,553	11,781	1,228	12,855		2,302
4162	Waste Removal	175	185	10	2,445	2,035	-410	2,216		-229
4163	Domestic Supplies	46	48	2	620	528	-92	575		-45
4171	Grounds Maintenance Costs	0	0	0	818	818	0	1,068		250
4181	Premises Insurance	0	0	0	1,200	1,200	0	1,200		0

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## Detailed Income & Expenditure by Year to Date Budget Heading 28/02/2018

		Current Mth Actual	Current Mnth Budget	Current Mnth Variance	Year to Date Actual	Year to Date Budget	Year to Date Variance	Total Annual Budget	Committed Expenditure	Funds Available
4203	Other Transport Costs	0	0	0	181	181	0	181		0
4301	Equipment	0	0	0	4,654	1,851	-2,803	1,851		-2,803
4302	Furniture	0	0	0	700	700	0	700		0
4303	Materials	0	0	0	217	217	0	217		0
4304	Catering	0	0	0	26	4	-22	4		-22
4313	Professional Fees - Other	0	230	230	2,336	2,530	194	2,770		434
4315	Insurance	0	0	0	64	64	0	64		0
4323	Telephones	25	24	-1	264	264	0	290		26
4324	Broadband	25	25	0	717	695	-22	795		78
4343	Licensing/PRS	0	0	0	561	350	-211	350		-211
4900	Miscellaneous Expenses	0	0	0	15	15	0	15		0
Wilfric	d Noyce Community Centre :- Expenditure	913	2,910	1,997	45,947	42,315	-3,632	45,862	0	-85
1301	Premises Hire Charges	0	4,080	-4,080	42,463	44,880	-2,417	48,963		
1303	Other customer/client receipts	0	0	0	2,083	2,083	0	2,083		
1304	Donations	0	0	0	3	0	3	0		
٧	Vilfrid Noyce Community Centre :- Income	0	4,080	-4,080	44,549	46,963	-2,414	51,046		
	Net Expenditure over Income	913	-1,170	-2,083	5,482	-565	-6,047	-1,101		
206	Bandstand									
4101	Repair/Alteration of Buildings	0	43	43	0	473	473	512		512
4102	Property Maintenance	0	0	0	45	45	0	45		0
4301	Equipment	0	0	0	194	194	0	194		0

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## Detailed Income & Expenditure by Year to Date Budget Heading 28/02/2018

		Current Mth Actual	Current Mnth Budget	Current Mnth Variance	Year to Date Actual	Year to Date Budget	Year to Date Variance	Total Annual Budget	Committed Expenditure	Funds Available
4343	Licensing/PRS	0	0	0	338	70	-268	70		-268
	Bandstand :- Expenditure	0	43	43	577	782	205	821	0	244
1301	Premises Hire Charges	0	0	0	627	627	0	627		
1303	Other customer/client receipts	0	0	0	190	190	0	190		
	Bandstand :- Income	0	0	0	817	817	0	817		
	Net Expenditure over Income	0	43	43	-240	-35	205	4		
207	Godalming Museum									
5101	Contrib. to Premises Provision	0	0	0	0	0	0	36,500		36,500
	Godalming Museum :- Expenditure	0	0	0	0	0	0	36,500	0	36,500
4001	Salaries	3,410	3,410	0	17,048	17,050	2	20,460		3,412
4002	Employer's NIC	301	470	169	1,514	2,189	675	2,659		1,145
4003	Employer's Superannuation	569	587	18	2,861	2,932	71	3,519		658
4011	Staff Training	0	0	0	0	0	0	1,000		1,000
4102	Property Maintenance	0	100	100	388	400	12	500		112
4301	Equipment	0	0	0	252	0	-252	0		-252
4304	Catering	0	0	0	186	186	0	186		0
4307	Stationery	0	0	0	197	197	0	197		0
4311	Professional Fees - Legal	184	0	-184	7,232	6,464	-768	6,464		-768
4313	Professional Fees - Other	0	0	0	1,545	0	-1,545	0		-1,545
4315	Insurance	0	0	0	4,506	4,564	58	4,564		58
4323	Telephones	0	25	25	31	100	69	125		94

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## Detailed Income & Expenditure by Year to Date Budget Heading 28/02/2018

		Current Mth Actual	Current Mnth Budget	Current Mnth Variance	Year to Date Actual	Year to Date Budget	Year to Date Variance	Total Annual Budget	Committed Expenditure	Funds Available
4325	Computing	152	0	-152	5,666	6,290	624	6,290		624
4900	Miscellaneous Expenses	0	0	0	23	23	1	183		161
	Godalming Museum :- Expenditure	4,616	4,592	-24	41,449	40,395	-1,054	46,147	0	4,698
1302	Rents	0	0	0	3,413	3,412	1	3,412		
1303	Other customer/client receipts	0	0	0	26,980	26,980	0	26,980		
	Godalming Museum :- Income	0	0	0	30,393	30,392	1	30,392		
	Net Expenditure over Income	4,616	4,592	-24	11,056	10,003	-1,053	52,255		
208	Land & Property - Other									
5001	Transfers from Reserves	0	0	0	-1,350	-1,350	0	-15,850		-14,500
5101	Contrib. to Premises Provision	0	0	0	1,000	1,000	0	1,000		0
	Land & Property - Other :- Expenditure	0	0	0	-350	-350	0	-14,850	0	-14,500
4101	Repair/Alteration of Buildings	0	137	137	0	828	828	965		965
4102	Property Maintenance	0	300	300	1,222	1,881	659	2,181		959
4111	Energy Costs	161	63	-98	357	250	-107	313		-44
4131	Rates	787	0	-787	1,286	1,750	464	1,750		464
4141	Water Services	507	113	-394	507	450	-57	563		56
4151	Fixtures & Fittings	0	0	0	443	750	307	750		307
4161	Cleaning	1,890	0	-1,890	1,890	0	-1,890	8,333		6,443
4171	Grounds Maintenance Costs	0	177	177	1,720	1,947	227	2,124		404
4301	Equipment	0	0	0	8,463	7,000	-1,463	7,000		-1,463
4303	Materials	0	0	0	-25	-25	0	-25		0

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## Detailed Income & Expenditure by Year to Date Budget Heading 28/02/2018

		Current Mth Actual	Current Mnth Budget	Current Mnth Variance	Year to Date Actual	Year to Date Budget	Year to Date Variance	Total Annual Budget	Committed Expenditure	Funds Available
4312	Professional Fees - Surveyors	0	0	0	650	650	0	650		0
4315	Insurance	0	0	0	152	800	648	800		648
4325	Computing	0	0	0	65	0	-65	0		-65
4900	Miscellaneous Expenses	0	0	0	390	150	-240	150		-240
	Land & Property - Other :- Expenditure	3,346	790	-2,556	17,119	16,431	-688	25,554	0	8,435
	Net Expenditure over Income	3,346	790	-2,556	16,769	16,081	-688	10,704		
	Policy & Management Expenditure	39,904	42,345	2,441	675,680	684,491	8,811	770,991	0	95,311
	Income	13,000	7,571	5,429	768,073	759,647	8,426	769,345		
	Net Expenditure over Income	26,904	34,774	7,870	-92,393	-75,156	17,237	1,646		

#### 12. GENERAL DATA PROTECTION REGULATIONS (GDPR)

As a Data Controller, Godalming Town Council is progressing with the work required for the implementation of the GDPR on 25 May 2018. The Town Clerk and Support Services Officer have attended training and information events and the Support Services Executive along with the Community Services & Communications Officer have undertaken Webinair GDPR training. Additionally, The Museum Curator and Volunteer Co-ordinator have also attended GDPR training events.

The Museum are progressing with data compliance, although they still await to discover if the GDP Act currently going through parliament will provide exemptions for historic archives. The Museum's Data Protection issues fall into two areas; the area of responsibility falling solely to GTC relating to the work of the staff, and the data relating to the work of the Museum Trust. There are obviously areas of overlap and further investigation is required to establish protocols and areas of responsibility. A potential outcome may be an overarching Data Protection Officer (DPO) to cover both entities.

Whilst initially there was some debate about whether the Town Clerk could be the DPO the very clear advice from both SALC and NALC is that the DPO should be an external appointment.

Within the Town Council office area, the Support Services Team are nearing completion of a 100% check of paper files and archive materials and are progressing with identifying data paths. The scope of this task should not be underestimated and remains a top priority for the Support Services Team.

The Town Clerk has been informed that templates relating to the required Deletion Policy, Privacy Statements, Data Retention Policy and Reporting of Personal Data Breaches Policy will shortly be available. Once received these will need to be worked up to GTC specific policies and will need to be adopted by Full Council as soon as practicable.

Members will wish to note the NALC Legal Briefing LO2 -18 (copy attached for the information of Members) regarding Reporting Personal Data Breaches. In considering this Legal Briefing, Members should specifically note the duty placed on them to report personal data breaches to the Data Controller within 72 hours of becoming aware of the breach (this includes weekends). Members are strongly advised to retain a copy of LO2-18 within their Members' Handbook.

As explained within the briefing note, the Council Corporate is the Data Controller and individual staff and councillors are Data Processors. An issue to be resolved is the appointment of a DPO. The advice provided is that no existing member of staff should act as the council's DPO. Amongst other issues the advice is based on:

- Conflicts of interests, which may arise from a staff members' responsibilities as a Data Processor.
- Lack of expert knowledge of data protection law and practices.

As such, Members are strongly advised that Godalming Town Council should appoint an external DPO.

SSALC has introduced GTC to a potential DPO service provider who has advised that GTC would require a 'Gold Level Service' at a cost of £2,000pa (details of the service are attached for the information of Members). It is expected that SSALC will be providing further potential providers, although it is anticipated that the costs for like for like services will be similar. If

Members agree to appoint an external DPO, the first stage of the relationship would be to conduct an audit of GTC's preparations in order to establish an implementation plan.

Members are requested to consider the requirement to appoint an external DPO and to resolve to agree to:

- The appointment of an external provider to act as Data Protection Officer for Godalming Town Council.
- Authorise the Town Clerk, once he has received a second quote for the provision of such services, to appoint a suitable external DPO at an annual cost not exceeding £2,000pa

#### Members are further requested to:

- Appoint the Town Clerk as the designated point of contact for staff and Members to report a potential personal data breach, with the Support Services Officer being the nominated second point of contact.
- Nominate a 'Lead Member' to assist, if necessary, with an investigation of a potential personal data breach.

It should be noted, that irrespective of the content of any 'model template' used to base GTC's data protection policies, the Town Clerk recommends that GTC's policy requires that a personal data breach be reported to the Council as the Data Controller at the next available meeting of either the Policy & Management Committee or Full Council, whichever is the earlier following the breach.



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FEBRUARY 2018

# LO2-18 | REPORTING PERSONAL DATA BREACHES

#### Introduction

When the General Data Protection Regulation ("GDPR") is introduced on 25 May 2018, data controllers such as councils and parish meetings will have new obligations to (i) keep an internal record of all personal data breaches (ii) report them within 72 hours to the ICO in certain circumstances and (iii) notify an individual affected by a personal data breach in certain circumstances. Data processors will also have a new obligation to notify the data controller of a personal data breach without delay.

A personal data breach may have significant consequences for an individual whose data is affected. Personal data breaches may also cause reputational damage for the council or parish meeting responsible for the breach. In addition, failure to report a breach may result in intervention by the ICO which includes a fine up to €10 million.

This briefing i) explains the new personal data breach reporting obligations, ii) encourages councils and parish meetings to ensure that there are organisational and technical resources in place to minimise the occurrence of personal data breaches and iii) explains how to respond to personal data breaches when they occur.

## a) What is a personal data breach?

GDPR defines this as "a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed" (Article 4). Examples of a personal data breach include:

- access by an unauthorised third party;
- deliberate or accidental action (or inaction) by a controller or processor;
- sending personal data to an incorrect recipient;
- computing devices containing personal data being lost or stolen;
- alteration of personal data without permission; and
- loss of availability of personal data.



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Lawful handling of personal data includes taking steps to reduce the risk of the occurrence of personal data breaches. GDPR specifically requires data controllers and data processors to implement appropriate technical and organisational measures to ensure appropriate levels of security against the risks presented by processing personal data. The risks include the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to personal data (Articles 5 and 32). The measures set out in GDPR include:

- the pseudonymisation and encryption of personal data;
- the ability to ensure the ongoing confidentiality, integrity, availability and resilience of processing systems and services;
- the ability to restore the availability and access to personal data in a timely manner in the event of a physical or technical incident;
- a process for regularly testing, assessing and evaluating the effectiveness of technical and organisational measures for ensuring the security of the processing.

## b) Consequences of a personal data breach

Personal data is information held by a data controller or processor about an individual which identifies them and may, for example, include contact details, date of birth, bank details, information about their education, health, personal, business or working life or family. A breach of personal data may result in a loss of control over personal data, discrimination, identity theft or fraud, financial loss, damage to reputation, loss of confidentiality of personal data, damage to property, social disadvantage.

This means that a breach, depending on the circumstances in each case, can have a range of adverse effects on an individual, which include emotional distress, and physical and material damage.

#### c) Data controller's duty to report a personal data breach to the ICO

GDPR provides that a data controller has an obligation to notify the ICO about a personal data breach if it is likely to result in "a risk to the rights and freedoms" of an individual. The breach must be reported "without undue delay and, where feasible, not later than 72 hours after having become aware of it" (Article 33). Where notification to the ICO is not made within 72 hours, it shall be accompanied by reasons for the delay. To notify the ICO of a personal data breach, please see the ICO's website <a href="https://ico.org.uk/for-organisations/report-a-breach/">https://ico.org.uk/for-organisations/report-a-breach/</a>



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When notifying the ICO of a breach which is likely to result in a risk to the rights and freedoms of an individual, a data controller must:

- describe the nature of the personal data breach including where possible, the categories and approximate number of data subjects concerned and the categories and approximate number of personal data records concerned;
- (ii) communicate the name and contact details of the data protection officer or other contact point where more information can be obtained;
- (iii) describe the likely consequences of the personal data breach and
- (iv) describe the measures taken or proposed to be taken to address the personal data breach, including, where appropriate, measures to mitigate its possible adverse effects.

GDPR provides that in so far as it is not possible to provide the information above at the same time, the above information may be provided in phases without "undue further delay".

# d) Data controller's duty to notify an individual that a personal data breach has occurred

GDPR provides that if a personal data breach is likely to result in "a high risk to the rights and freedoms" of an individual, the data controller must communicate this to him "without undue delay" (Article 34). When communicating with the individual concerned, the data controller must describe in clear and plain language the nature of the personal data breach and provide the information set out in (ii)-(iv) in section c) above .

Examples of personal data breaches about which an affected individual would need to be notified are below.

- a ransomware attack which results in the council's electronic personal data being encrypted. Back-ups are not available and the data cannot be restored/ made available to the council;
- an HR file is left on a bus;
- the clerk emails a database of council contractors' payee details to the RFO and copies all councillors;
- an ex-clerk/ councillor refuses to return paper/ electronic files containing personal data;
- unencrypted personal data is emailed to a councillor's personal device and his emails are hacked;



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- a councillor shares sensitive personal data about a council employee on his Facebook account.
- an old council computer which still contains personal data on the hard drive is donated to a local charity.

GDPR provides that a data controller does not need to communicate with an individual if any of the following applies.

- It has implemented appropriate technical and organisational protection measures, and that those measures have rendered the personal data unintelligible to any person who is not authorised to access it, such as encryption;
- It has taken subsequent measures which ensure that the high risk to the rights and freedoms of individual(s) is no longer likely to materialise or
- It would involve disproportionate effort. In such a case, there shall instead be
  a public communication or similar measure whereby the individual(s) are
  informed in an equally effective manner.

Even when a data controller is excused from communicating with an individual for the reasons above GDPR provides that the ICO, who should already have been notified of the personal data breach, still has the power to require the data controller to inform the affected individual if it considers there is a high risk to the individual's rights and freedoms.

## e) Data processor's duty to notify data controller of a personal data breach

GDPR provides that when a data processor becomes aware of a personal data breach, it must notify the data controller of this "without undue delay".

A council may outsource its payroll and or HR functions to a business. In this example, the business would be processing the personal data relating to the council's staff on behalf of the council and is a data processor. If the business suffers a temporary loss of personal data due to a power outage which means it cannot pay salaries on time, the business would need to report this to the council.

#### f) Responding to personal data breaches

Staff, councillors (and parish meeting chairs) ought to able to recognise what may constitute a personal data breach. Awareness and training for this purpose is recommended. Anyone should be able to raise / escalate the consideration of an incident to appropriate person(s) to i) determine whether a personal breach has occurred and ii) respond appropriately.



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As some breaches may need to be reported by a data controller within 72 hours, it is recommended that each council (and parish meeting) designates person(s), who are available at short notice, with the responsibilities summarised below.

- to promptly investigate potential personal data breaches;
- to respond to personal data breaches discovered by the data controller (including those reported to it by its data processor(s));
- to take steps to address a personal data breach and to mitigate negative consequences and
- to, as appropriate, report a breach to the ICO and the individual(s) affected by the breach.

The designated persons within a council could be the clerk/ RFO who may consult with the Chairman, and or relevant committee chairs and, as appropriate, with businesses which provide the council's IT support services and or host and maintain its server. A committee or sub-committee could not be responsible for investigating or responding to personal data breaches because the notice period for convening a meeting is inconsistent with the urgency of the work involved. The persons responsible for responding to breaches may wish to consult with the council's DPO.

The ICO's website has prepared two checklists which councils and parish meetings can use to ascertain if they are ready to respond to a personal data breach. These can be accessed via <a href="https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/personal-data-breaches/">https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/personal-data-breaches/</a>

#### g) Data controller's duty to record all personal data breaches

GDPR requires a data controller to keep an internal record of all personal data breaches (regardless of whether or not they need to be reported to the ICO), comprising the facts relating to the personal data breach, its effects and the remedial action taken (Article 33). An example of a breach which would not need to be reported to the ICO but would need to be recorded internally is the loss of encrypted personal data on a memory stick.

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#### **Price levels**

We provide these services at four price levels. Bronze, Silver and Gold (defined below) are strongly supported by online automation tools. Platinum is a bespoke service for organisations that fall outside the scope of the first three.

a) **The Bronze Service** is designed for the very small entity that has a legal or strategic requirement to appoint a DPO, but whose budget can only support a nominal fee. To make this possible Satswana have developed an online support resource with email responders to queries or problems, supported by Blogs, newsletters, FAQ's and a Twitter feed.

Applicants must attend a Foundation Workshop, charged separately, when signing up for the first time. Outputs from this will be awareness, briefing on requirements and the issue of a "Discovery" document with an explanation of how to complete it online. Support for this process is provided by a "chat" pane.

This document is reviewed by a DPO who will then deliver an Impact Assessment online with any recommendations for action. Please note that this level is expected to be managed on a single personal computer, by a single executive, so the assessment and recommendations are going to be largely standard. If provision becomes more complex, they will have to move up to either the Silver or Gold service.

Additional services may be chargeable, and subject to a prior quotation. There are two exceptions. If a Member suffers a breach, or is the recipient of aggressive Subject Access Requests, then (providing they have complied with recommendations) they will be supported to the conclusion of the incident, regardless of time.

#### Currently Bronze is charged at £150 per annum, plus VAT at the ruling rate.

b) The Silver Service is designed for those organisations that have more than one executive, with additional staff that may be voluntary or part time. Generally their management and services will be the same as the Bronze Service, but their requirements will be more complex and represent a greater risk that a Breach may be suffered, or that aggressive Subject Access Requests may be received.

They may request, or receive, one personal visit per annum from their DPO for a consultation period of one hour.

Currently Silver is charged at £500 per annum, plus VAT at the ruling rate.



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c) The Gold Service expects to support an entity that has a number of departments managed by full time staff, possibly with a turnover (or equivalent value) of around one million Pounds per annum, or with particularly sensitive data, such as schools.

This level will have access to all the support they require from our online services, but the Impact Assessment will be subject to an individual consultation and bespoke recommendations. They will also be entitled to a quarterly personal visit from their DPO.

# Currently Gold is charged at £2000 per annum, plus VAT at the ruling rate. For schools, the fee is currently £2000 per 500 pupils.

d) These levels are designed to address the complexity of the subject, so there can be no precise break points. For instance many schools may fall within the Gold Service but a Further Education College is unlikely to – meaning that they will require a bespoke Platinum Contract. Applicants can register for the Gold Service, but may be moved up to Platinum at the Impact Assessment stage.

In terms of contract we would bill annually in advance through the online registration process. The nature of the evolving compliance relationship is such that this should be a recurring "evergreen" arrangement. We should point out that the retained status of a DPO is protected to some degree within the Regulation so, as with the "conflict of interest" provision, a DPO cannot just be sacked on the whim of a Chief Executive who may not like the advice they are being given. Of course all normal reasonable parameters regarding performance apply, so change is not immutable, but it must be for solid reasons.

Once any recommendations contained within the Impact Analysis have been adopted then all your Members should be compliant with GDPR. The role of the DPO thereafter would be as detailed below. This will not be left to chance; a DPO will have their work managed through the computer based support management structure to confirm that they have executed these requirements on a regular basis.

#### Fractional DPO Services are required to deliver the following services:

- 1. To satisfy the regulatory requirement for the organisation to have a nominated DPO;
- 2. To deal with all matters arising from that role, especially ensuring that the privacy of the data of natural persons is being protected;
- 3. To update clients with any change in interpretation, guidance or case law and ensuring their subsequent ongoing compliance;
- 4. To promote and maintain the currency of a plan to deal with any breach situation;
- 5. To be specifically available to deal with any breach concerns, and to ensure that any arising problems are managed;
- 6. To counsel on the impact of any changes in IT, whether that be programs, scope, or to meet an evolving threat;
- 7. To be continuously aware of any training needs and if identified consult with your ALC for it to be resolved;



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- 8. To assist clients to answer and manage subject access requests;
- 9. To assist in the provision of any arising solutions, such as encryption;
- 10. To advise in any circumstance where data should be removed;
- 11. To make available an email response service as a problem resolver;
- 12. To be aware of risks to the client, particularly from a Cloud or Processor source;
- 13. To provide a reporting conduit to the ICO in the event of a breach;
- 14. To manage discussions with the ICO on behalf of their client;
- 15. To provide an interface with data subjects regarding their rights;
- 16. To support customers with draft policy templates for consideration;
- 17. To provide support regarding encryption, tokenisation or pseudonymisation as required;
- 18. To provide model standards for backup and confirm adoption;
- 19. To offer advice where applicable on penetration testing and hacking risk;
- 20. The formal basis of our service is that we act as a Data Protection Officer as required by GDPR or DPB, providing a reporting and liaison link with the Information Commissioners Office as required.

## The Godalming Members' Code of Conduct

#### **Introduction and Interpretation**

- This Code applies to you as a Member of Godalming Town Council ("the Council") when you act in your role as a Member.
  - (2) You are a representative of the Council and the public will view you as such. Your actions can impact on how the Council as a whole is viewed.
  - (3) This Code is based on and is consistent with the principles of public life set out in Section 28 Localism Act 2011 which Godalming endorses: -
    - selflessness
    - integrity
    - objectivity
    - accountability
    - openness
    - honesty
    - leadership

Godalming is under a duty to promote and maintain high standards of conduct by members

- (4) It is your responsibility to comply with the provisions of this Code when acting in your capacity as a Member.
- (5) In this Code -

"meeting" means any meeting of

- (a) the Council;
- (b) the Executive;
- (c) any of the Council's committees, sub-committees, joint committees, joint sub-committees, area committees, Special interest Groups;

#### **General Obligations**

- 2. (1) **You must** always treat member colleagues, officers, other organizations and members of the public with respect.
  - (2) **You must not** conduct yourself in a manner which is contrary to the Council's duty to promote and maintain high standards of conduct by Members.
  - (3) **You must not** disclose information given to you in confidence by anyone, or information acquired by you which you believe, or ought reasonably to be aware, is of a confidential nature, except where
    - (i) you have the consent of a person authorised to give it;
    - (ii) you are required by law to do so;
    - (iii) the disclosure is made to a third party for the purpose of obtaining professional legal advice provided that the third party agrees not to disclose the information to any other person; or
    - (iv) the disclosure is -

<sup>&</sup>quot;Member" includes a co-opted member and an appointed member.

- (aa) reasonable and in the public interest;
- (bb) made in good faith and in compliance with the reasonable requirements of the Council; and
- (cc) you have consulted the Monitoring Officer or taken other independent legal advice prior to its release.
- (4) **You must not** prevent another person from gaining access to information to which that person is entitled by law.
- (5) **You must not** use or attempt to use your position as a Member improperly to confer on or secure for yourself or any other person an advantage or disadvantage.
- 3. When using or authorising the use by others of the resources of the Council -
  - (1) **Do** act in accordance with the Council's reasonable requirements and policies;
  - (2) **Do** ensure that such resources are not used improperly for political purposes (including party political purposes); and
  - (3) Do have regard to any applicable Local Authority Code of Publicity made under the Local Government Act 1986.

#### **Gifts and Hospitality**

- 4. (1) **Do** exercise caution in accepting any gifts or hospitality which are (or which you reasonably believe to be) offered to you because you are a Member.
  - (2) **Do not** accept significant gifts or hospitality from persons seeking to acquire, develop or do business with the Council or from persons who may apply to the Council for any permission, licence or other significant advantage.
  - (3) **Do** register with the Monitoring Officer any gift or hospitality with an estimated value of at least £25 within 28 days of its receipt.

#### **Registration of Interests**

- 5. (1) You must notify the Monitoring Officer of your disclosable pecuniary interests, or other interests which the Council has decided are appropriate for registration. On election, you must do this within 28 days of being elected or appointed to office. Details of disclosable pecuniary interests are set out in the Annexe to this Code.
  - (2) **Do** similarly notify the Monitoring Officer of any disclosable pecuniary or other interests not already registered within 28 days of your re-election or reappointment to office.
  - (3) **Do** be aware that disclosable pecuniary interests include not only your interests but also the interests of your spouse or civil partner, a person with whom you are living as husband or wife or a person with whom you are living as if they were a civil partner, so far as you are aware of the interests of that person.
  - (4) **Do** be aware that the Council has decided that it is appropriate for you to register and disclose non-pecuniary interests that arise from your membership of or your occupation of a position of general control or management in the following bodies -
    - (i) bodies to which you have been appointed or nominated by the Council;
    - (ii) bodies exercising functions of a public nature;
    - (iii) bodies directed to charitable purposes;
    - (iv) bodies one of whose principal purposes include the influence of public opinion or policy.

#### **Disclosure of Interests and Participation**

- 6. (1) **Do** disclose to a meeting at which you are present any disclosable pecuniary interest, or other interest which the Council has decided is appropriate for disclosure.
  - (2) **Do** notify the Monitoring Officer of any interest not already registered that is disclosed to a meeting under paragraph 6(1) above within 28 days of the disclosure.
  - (3) **Do not** participate in any discussion, or vote, where you have a disclosable pecuniary interest in a matter. **Do** withdraw from the meeting during the consideration of the matter.

#### **Decision-making and Predetermination**

- 7. (1) Where you have been involved in campaigning in your political role on an issue which does not impact on your personal and/or professional life, you should not be prohibited from participating in a decision in your political role as a Member.
  - (2) However, **do not** place yourself under any financial or other obligation to outside individuals or organizations that might seek to influence you in the performance of your official duties.
  - (3) When making a decision, do consider the matter with an open mind and on the facts before the meeting at which the decision is to be made, listening to the advice of relevant parties, including advice from officers, and taking all relevant information into consideration, remaining objective and making decisions on merit.

#### **ANNEXE 1 - DISCLOSABLE PECUNIARY INTERESTS**

#### 1. Employment, office, trade, profession or vocation

Any employment, office, trade, profession or vocation carried on for profit or gain.

#### 2. Sponsorship

Any payment or provision of any other financial benefit (other than from the Council) made or provided within the period of 12 months ending with the day on which you give a notification for the purposes of section 30(1) or section 31(7) of the Localism Act 2011 in respect of any expenses incurred in carrying out your duties as a member, or towards your election expenses. This includes any payment or financial benefit from a trade union within the meaning of the Trade Union and Labour Relations (Consolidation) Act 1992.

#### 3. Contracts

Any contract which is made between you (or a body in which you have a beneficial interest) and the Council-

- (a) under which goods or services are to be provided or works are to be executed; and
- (b) which has not been fully discharged.

#### 4. Land

Any beneficial interest in land which is within the area of the Council.

#### 5. Licences

Any licence (alone or jointly with others) to occupy land in the area of the Council for a month or longer.

#### 6. Corporate Tenancies

Any tenancy where (to your knowledge)-

- (a) the landlord is the Council; and
- (b) the tenant is a body in which you have a beneficial interest.

#### 7. Securities

Any beneficial interest in securities of a body where-

- (a) that body (to your knowledge) has a place of business or land in the area of the Council; and
- (b) either-
  - (i) the total nominal value of the securities exceeds £25,000 or one hundredth of the total issued share capital of that body; or
  - (ii) if the share capital of that body is of more than one class, the total nominal value of the shares of any one class in which you have a beneficial interest exceeds one hundredth of the total issued share capital of that class.

#### ANNEXE 2 - INVESTIGATION OF ALLEGED BREACHES OF THE CODE & SANCTIONS

#### 8. Alleged Breach of the Code

Any allegation of a breach of the code of conduct by a member of Godalming Town Council will be referred to the Monitoring Officer for that officer to investigate. All investigations will be conduct in accordance with such guidelines as Waverley Borough Council's Standards Panel may have approved for that purpose.

#### 9. Sanctions

If any person or body investigating an alleged breach of the code (in accordance with the guidelines referred to above) finds that there has been a breach of that code then they are required to report that matter to Godalming Town Council. In all cases the investigating person/body will be asked to make a recommendation to Godalming Town Council as to the sanction to be applied to the member in breach of the code.

The available sanctions are:

- publication of the findings in respect of the member's conduct;
- removal of the member from any or all Committees or Sub-Committees of the Council;
- instruction of the Monitoring Officer/Town Clerk to, arrange training for the member;
- removal of the member from all outside appointments to which he/she has been appointed or nominated by Town Council;
- withdrawal of any facilities provided to the member by the Council, such as a computer, website and/or email and Internet access; or
- exclusion of the member from the Council's offices or other premises, with the exception of meeting rooms as necessary for attending Council, Committee and Sub-Committee meetings.



## MEMBERS' CODE OF CONDUCT FOR PARISH COUNCILS

#### **Introduction**

Pursuant to Section 27 of the Localism Act 2011, Godalming Town Council ('the Council') has adopted this Code of Conduct to promote and maintain high standards of behaviour by its Members and co-opted Members whenever they conduct the business of the Council, including the business of the office to which they were elected or appointed, or when they claim to act or give the impression of acting as a representative of the Council.

This Code of Conduct is based on the principles of selflessness, integrity, objectivity, accountability, openness, honesty and leadership.

#### **Definitions**

For the purposes of this Code a 'co-opted member' is a person who is not a member of the Council but who is either a member of any committee or sub-committee of the Council, or a member of and represents the Council on any joint committee or joint sub-committee of the Council, and who is entitled to vote on any question that falls to be decided at any meeting of that committee or sub-committee.

For the purposes of this Code, a 'meeting' is a meeting of the Council, any of its committees, sub-committees, joint committees or joint sub-committees.

For the purposes of this Code, and unless otherwise expressed, a reference to a member of the Council includes a co-opted member of the Council.

#### **Member Obligations**

When a member of the Council acts, claims to act or gives the impression of acting as a representative of the Council, he/she has the following obligations.

- 1. He/she shall behave in such a way that a reasonable person would regard as respectful.
- 2. He/she shall not act in a way which a reasonable person would regard as bullying or intimidatory.
- 3. He/she shall not seek to improperly confer an advantage or disadvantage on any person.
- 4. He/she shall use the resources of the Council in accordance with its requirements.
- 5. He/she shall not disclose information which is confidential or where disclosure is prohibited by law.

#### Registration of Interests

- 6. Within 28 days of this Code being adopted by the Council, or the member's election or the coopted member's appointment (where that is later), he/she shall register with the Monitoring Officer the interests which fall within the categories set out in Appendices A and B.
- 7. Upon the re-election of a member or the re-appointment of a co-opted member, he/she shall within 28 days re-register with the Monitoring Officer any interests in Appendices A and B.

- 8. A member shall register with the Monitoring Officer any change to interests or new interests in Appendices A and B within 28 days of becoming aware of it.
- 9. A members need only declare the existence but not the details of any interest which the Monitoring Officer agrees is a 'sensitive interest'. A sensitive interest is one which, if disclosed on a public register, could lead the member or a person connected with the member to be subject to violence or intimidation.

## Declaration of Interests at Meetings

- 10. Where a matter arises at a meeting which relates to an interest in Appendix A the member shall not participate in a discussion or vote on the matter. He/she only has to declare what his/her interest is if it is not already entered in the member's register of interests or if he/she has not notified the Monitoring Officer of it.
- 11. Where a matter arises at a meeting which relates to an interest in Appendix A which is a sensitive interest, the member shall not participate in a discussion or vote on the matter. If it is a sensitive interest which has not already been disclosed to the Monitoring Officer, the member shall disclose he/she has an interest but not the nature of it.
- 12. Where a matter arises at a meeting which relates to an interest in Appendix B, the member shall not vote on the matter. He/she may speak on the matter only if members of the public are also allowed to speak at the meeting.
- 13. A member only has to declare his/her interest in Appendix B if it is not already entered in his/her register of interests or he/she has not notified the Monitoring Officer of it or if he/she speaks on the matter. If he/she holds an interest in Appendix B which is a sensitive interest not already disclosed to the Monitoring Officer, he/she shall declare the interest but not the nature of the interest.
- 14. Where a matter arises at a meeting which relates to a financial interest of a friend, relative or close associate (other than an interest of a person in Appendix A), the member shall disclose the nature of the interest and not vote on the matter. He/she may speak on the matter only if members of the public are also allowed to speak at the meeting. If it is a 'sensitive interest' the member shall declare the interest but not the nature of the interest.

#### **Dispensations**

15. On a written request made to the Council's proper officer, the Council may grant a member a dispensation to participate in a discussion and vote on a matter at a meeting even if he/she has an interest in Appendices A and B in the Council believes that the number of members otherwise prohibited from taking part in a meeting would impede the transaction of the business; or it is in the interests of the inhabitants in the Council's area to allow the member to take part or it is otherwise appropriate to grant a dispensation.

## Appendix A

Interests described in the table below.

Subject	Description
Employment, office, trade, profession or	Any employment, office, trade, profession or vocation carried on for profit or gain by the member or by his/her spouse or civil partner or by the person with whom
vocation	the member is living as if they were spouses/civil partners.
Sponsorship	Any payment or provision of any other financial benefit (other than from the Council) made to the member during the 12 month period ending on the latest date referred to in paragraph 6 above for expenses incurred by him/her in carrying out his/her duties as a member, or towards his/her election expenses. This includes any payment or financial benefit from a trade union within the meaning of the Trade Union and Labour Relations (Consolidation) Act 1992.
Contracts	Any contract made between the member of his/her spouse or civil partner or the person with whom the member is living as if they were spouses/civil partners (or a firm in which such person is a partner, or an incorporated body of which such person is a director* or a body that such person has a beneficial interest in the securities of*) and the Council—  a) under which goods or services are to be provided or works are to be executed; and  b) which has not been fully discharged.
Land	Any beneficial interest in land held by the member or by his/her spouse or civil partner or by the person with whom the member is living as if they were spouses/civil partner which is within the area of the Council.  'Land' excludes an easement, servitude, interest or right in or over land which does not give the member or his/her spouse or civil partner or the person with whom the member is living as if they were spouses/civil partners (alone or jointly with another) a right to occupy or to receive income.
Licences	Any licence (alone or jointly with others) held by the member or by his/her spouse or civil partner or by the person with whom the member is living as if they were spouses/civil partners to occupy land in the area of the Council for a month or longer.
Corporate Tenancies	<ul> <li>Any tenancy where (to the member's knowledge)—</li> <li>a) the landlord is the Council; and</li> <li>b) the tenant is a body that the member, or his/her spouse or civil partner or the person with whom the member is living as if they were spouses/civil partners is a partner of or a director* of or has a beneficial interest in the securities* of.</li> </ul>
Securities	Any beneficial interest held by the member or by his/her spouse or civil partner or by the person with whom the member is living as if they were spouses/civil partners in securities* of a body where—  a) that body (to the member's knowledge) has a place of business or land in the area of the Council; and  b) either—
	<ul> <li>i. the total nominal value of the securities* exceeds £25,000 or one hundredth of the total issued share capital of that body; or</li> <li>ii. if the share capital of that body is more than one class, the total nominal value of the shares of any one class in which the member, or his/her spouse or civil partner or the person with whom the member is living as if they were spouses/civil partners has a beneficial interest exceeds one hundredth of the total issued share capital of that class.</li> </ul>

<sup>\*&#</sup>x27;director' includes a member of the committee of management of an industrial and provident society.

<sup>\*&#</sup>x27;securities' means shares, debentures, debenture stock, loan stock, bonds, units of a collective investment scheme within the meaning of the Financial Services and Markets Act 2000 and other securities of any description, other than money deposited with a building society.

## Appendix B

An interest which relates to or is likely to affect:

- i. any body of which the member is in a position of general control or management and to which he/she is appointed or nominated by the Council
- ii. any body
  - a) exercising functions of a public nature;
  - b) directed to charitable purposes; or
  - c) one of whose principal purposes includes the influence of public opinion or policy (including any political party or trade union)
  - of which the member of the Council is a member or in a position of general control or management;
- iii. any gifts or hospitality worth more than an estimated value of £50 which the member has received by virtue of his or her office.

#### 16. FLORAL GODALMING

Officers have been working with the Chamber of Commerce, SCC Highways and The Caudle Memorial Fund to look at options to provide sustainable floral displays within the central areas of Godalming. The displays looked at are container troughs on the barrier rails within the town centre with circular containers around a number of bollards and poles, approximately 50 floral displays (not including the normal Pepperpot Displays).

One of the difficulties always encountered during previous considerations of flower planters has been the cost and logistics of ensuring the watering of plant containers in the public realm. Via the 'Clerks magazine', a British company has been found who manufacture containers for use in the type of locations being considered (they have been doing so for 50 years and some of Winchester's containers are now nearly 20 years old and still in use) these containers have a water reservoir (in the majority of the containers proposed this is 28 litres) and the plants are watered via a capillary system.

In most conditions the planters would need to be filled with water weekly although this could increase in extreme heat to twice weekly. The amount of water required each week would be approx. 1000 litres for the envisaged scheme. Over a 22-week period this is something approaching 22,000 litres or just over 1m³ at a cost of approx. £45. As riparian land owners we are able to extract up to 20,000 a day, so could, if we wished, extract the water from Old Drift Way. However, we would need to consider the cost of 'metered water' against the cost of a labour charge to extract the water from Old Drift Way (next to the town bridge). We have identified two potential options for managing the weekly watering, both with the ability to expand to twice weekly during extreme weather conditions, with the cost being in the region of £30-45 per watering. Additionally the cost of the containers, installation and end of season take down cost, estimated maintenance costs, contingency for extra watering and planting cost along with the cost for adapting some of the railings have all been identified.

The Caudle Memorial Fund has kindly agreed to fund £13,000 to the schemes capital cost and the first year's operational costs as indicated below. The Chamber of Commerce having indicated their support in meeting any potential shortfall.

Going forward, the aim would be that, having demonstrated the viability and benefit of the project, the Community Support & Communications Officer be tasked with gaining sponsorship for future years so that the project becomes self-sustaining. Early indications from the Chamber of Commerce indicate support amongst businesses for this to be the case. It is anticipated that the level of sponsorship achieved would be known before the 2019/20 budget setting process. If, for whatever reason, the required funds could not be achieved via sponsorship the future of the scheme would be brought back to this committee for consideration. It should be noted that Officers do not consider it would be necessary for any increase in precept as a decision could be made to fund any shortfall from either the existing Town Promotion budget or the Emerging Projects Budget. Irrespective of which budget, the aim would be to know the level of sponsorship for the following year before the budget setting process begins.

Members will note, this scheme is being called Floral Godalming so as to avoid any confusion with the existing Godalming in Bloom organisation, which is primarily a judging competition as opposed to a provider or display installers.

## One off costs

Capital cost of plant containers	£3725
30 troughs, 7 bollard/post baskets	
+ 3 baskets at bus stop	
Flower Trees (Church Street) x 2	£910
Flower tree installation	£500
300lt water tanks x 2	£300
Watering accessories	£280
Fettling to existing rails	£1280
Acknowledgement labels	£500
Total	£7495.02

## **Annual Costs**

Total	£5575 - 6070
Sponsor acknowledgement labels	£500
Maintenance	£500
Take down	£300
Installation	£300
Water costs	£45
Watering	£990 - £1485
Planting	£2940

otal

# **SURREY ASSOCIATION OF LOCAL COUNCILS(SALC)**

- 1. The Town Council is a member of the Surrey Association of Local Councils(SALC). The Association is a membership organisation which provides advice, support and training to Parish and Town councils throughout Surrey. Over the past year this Council has drawn heavily on the support of the Association in connection with its handling of its dispute with the former Town Clerk and also in drawing up and putting in place a new staffing structure following her departure. The Association's Chief Executive has also helped us kick start the process of putting in place a vision and business plan for the Council.
- 2.1 have attached to this report for the benefit of both newer and longer serving councillors three documents which may be of interest. These are :-
- The Association's Annual report and accounts,
- A flyer about the Association's work, and
- The list of 2018 training courses offered by the Association. (If you feel you would benefit from any of these excellent courses please contact the Town Council office).
- 3 The Town Council is at the present time well represented in the Surrey Association as Cllr Anne Bott is employed as its Assistant Chief Executive, with specific responsibility for advising all affiliated Surrey Towns and Parishes. I have also been elected as a Director of the Board of SALC which has overall control of its affairs.
- 4. The Town Council office circulate to all Councillors all appropriate SALC And National Council (NALC) bulletins which enables members to keep in touch with current and emerging issues. I am always happy to discuss any issues that members may have in connection with these.

**Steve Cosser** 

February 2018

#### **GODALMING TOWN COUNCIL**

Disclosure by a Member<sup>1</sup> of a disclosable pecuniary interest or a non-pecuniary interest in a matter under consideration at a meeting (S.31 (4) Localism Act 2011 and the adopted Godalming Members' Code of Conduct).

As required by the Localism Act 2011 and the adopted Godalming Members' Code of Conduct, **I HEREBY DISCLOSE**, for the information of the authority that I have [a disclosable pecuniary interest]<sup>2</sup> [a non-pecuniary interest]<sup>3</sup> in the following matter:-

COMMITT	EE:	DA	NIE:		
NAME OF	COUNCILLOR:				
Please use	the form below to state in	which agenda ite	ms you have an	interest.	
Agenda No.	Subject	Disclosable Pecuniary Interest	Non- Pecuniary Interest	Reason	
Signed				Dated	

<sup>&</sup>lt;sup>1</sup> "Member" includes co-opted member, member of a committee, joint committee or sub-committee

<sup>&</sup>lt;sup>2</sup> A disclosable pecuniary interest is defined by the Relevant Authorities (Disclosable Pecuniary Interests) regulations 2012/1464 and relate to employment, office, trade, profession or vocation, sponsorship, contracts, beneficial interests in land, licences to occupy land, corporate tenancies and securities

<sup>&</sup>lt;sup>3</sup> A non-pecuniary interest is defined by Section 5 (4) of the Godalming Members' Code of Conduct.