

PARISH OF GODALMING

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Sir/Madam

I HEREBY SUMMON YOU to attend the Full Council Meeting of the Godalming Town Council to be held in the Council Chamber, Municipal Buildings, Bridge Street, Godalming on THURSDAY, 19 JULY 2018 at 7.00pm.

DATED this 13th day of July 2018.

Andy Jeffery
Clerk to the Town Council

The meeting will be preceded by prayer – all who wish to participate in prayers are most welcome to do so; however, anyone not wishing to participate may leave the chamber or sit quietly for the short duration of the prayers. All individuals' decisions in this matter are respected.

A G E N D A

1. THE TOWN MAYOR to sign as a correct record the Minutes of the Meeting of the Council held on the 10 May 2018.

2. TO RECEIVE apologies for absence.

3. PETITIONS/STATEMENTS/QUESTIONS FROM MEMBERS OF THE PUBLIC

THE TOWN MAYOR to allow members of the public to ask the Council questions, or make a statement or present a petition. This forum to be conducted in accordance with Standing Order 4.

4. DISCLOSABLE PECUNIARY INTERESTS AND NON-PECUNIARY INTERESTS

To receive from Members any declarations of interests in relation to any items included on the Agenda for this meeting required to be disclosed by the Localism Act 2011 and the Godalming Members' Code of Conduct.

5. TO RECEIVE official announcements, letters, etc.

6. PRESENTATION FROM GODALMING CYCLE CAMPAIGN

Members to receive a presentation from the Godalming Cycle Campaign on the Guildford to Godalming Greenway.

Members of the Public have the right to attend all meetings of the Town Council and its Committees and are welcome.

7. TO RECEIVE Chairmen's reports of the Committees as under:

Policy & Management Committee

The Policy & Management Committee made the following recommendations to Full Council:

GDPR – Policies

The Policy & Management Committee recommends that, to comply with the requirements of the General Data Protection Regulations, Full Council resolves to adopt the policies listed below (attached for the information of Members).

- i. Document Retention Policy
- ii. Information Data Protection Policy
- iii. Removable Media Policy

Business Plan Working Group – Supporting Our Community Information Brochure

The Policy & Management Committee recommends that Full Council resolves to adopt the 'Supporting Our Community Information Brochure' (attached for the information of Members) produced by the Business Plan Working Group, which will be made available to the community via the Council's website and in hardcopy at the Council Offices and Museum.

Treasury and Investment Policy

The Policy & Management Committee recommends that Full Council resolves to adopt the Treasury and Investment Policy (attached for the information of Members).

Standing Orders

The Policy & Management Committee recommends that Full Council resolves to adopt Standing Order (amended Standing Orders attached for the information of Members).

Staffing Committee

The Staffing Committee made the following recommendations to Full Council:

Policy Reviews – Leave Policy

The Staffing Committee recommends that Full Council resolves to adopt the Leave Policy (attached for the information of Members).

Policy Reviews – Absence & Sick Pay Policy

The Staffing Committee recommends that Full Council resolves to adopt the Absence & Sick Pay Policy (attached for the information of Members).

Policy Reviews – Training Statement of Intent

The Staffing Committee recommends that Full Council resolves to adopt the Training Statement of Intent (attached for the information of Members)

Policy Reviews – Discipline Policy

The Staffing Committee recommends that Full Council resolves to adopt the Discipline Policy (attached for the information of Members)

Policy Reviews – Grievance Policy

The Staffing Committee recommends that Full Council resolves to adopt the Grievance Policy (attached for the information of Members)

Pay Awards

Members to receive the recommendation of the Staffing Committee on the staff pay award for 2018/19.

The Staffing Committee recommend that Full Council resolves to approve the implementation in full of the 2018/2019 staff pay award as recommended by the National Association of Local Councils. Additionally, the Staffing Committee recommend that, for administrative purposes, Full Council resolve to approve the alignment of the recently TUPE'd staff's salaries to the closest NJC scale.

8. REVIEW OF THE EFFECTIVENESS OF INTERNAL CONTROLS FOR GODALMING TOWN COUNCIL AND GODALMING JOINT BURIAL COMMITTEE

Following a review of the effectiveness of internal controls for Godalming Town Council and the Godalming Joint Burial Committee, the Audit Committee recommends to Full Council the responses to the questions posed by the review. Those questions and the recommended answers are attached for the information of Members.

Full Council to resolve to approve the recommended answers.

9. TO RECEIVE the minutes of the undermentioned Committees:

	Meetings Dated
Mayoralty Committee	24 May 2018
Policy & Management Committee	24 May 2018 12 July 2018
Staffing Committee	3 May 2018 21 June 2018

10. GODALMING JOINT BURIAL COMMITTEE – REPORT

TO NOTE FOR INFORMATION the report of the Godalming Joint Burial Committee of its proceedings on the 21 June 2018.

11. CHRISTMAS FESTIVAL

Whilst this item would normally be considered by the Policy & Management Committee, a requirement to secure the booking of the 'celebrity' means that the event budget needs to be approved before the date of the next P&M in September.

Members are requested to approved the budget for the 2018 Christmas Festival and Lights Switch On (attached for the information of Members)

12. NEIGHBOURHOOD PLAN – OUTCOMES OF REGULATION 14 CONSULTATION AND PREPERATIONS FOR REGULATION 15

As the Qualifying Body for the Godalming and Farncombe Neighbourhood Plan, Members are requested to consider the attached reports relating to the Godalming and Francombe Neighbourhood Plan.

- a. NEIGHBOURHOOD PLAN – Actions Required following Regulation 14 Consultation
- b. Neighbourhood Plan version 3.3 – Regulation 14 Consultation Representations, Response and Suggested Actions
- c. Draft Neighbourhood Plan (version 3.3.3)

Recommendations:

Members to resolve to:

1. Approve the actions contained in the ‘suggested actions’ column of the *Neighbourhood Plan version 3.3 – Regulation 14 Consultation Representations, Response and Suggested Actions* document
2. Authorise the Town Clerk to prepare the Godalming and Farncombe Neighbourhood Plan version 4 in readiness for submission to Waverley Borough Council for consideration under Regulation 15 of Neighbourhood Planning (General) Regulations 2012, incorporating the actions approved by Council at recommendation 1.
3. Authorise the Town Clerk to prepare the basic conditions statement and consultation statement required for submission of the plan to Waverley Borough Council.

13. TO AUTHORISE the Clerk to sign or, where appropriate to have sealed on behalf of the Town Council any orders, deeds, or documents necessary to give effect to any of the matters contained in the Reports received at this meeting or in any Resolution passed by the Council.

14. DATE OF NEXT MEETING

The date of the next Full Council meeting is scheduled to be held on Thursday, 13 September 2018 at 7.00 pm in the Council Chamber.

15. ANNOUNCEMENTS

Brought forward by permission of the Chairman. Requests to be submitted prior to commencement of the meeting.

DOCUMENT RETENTION SCHEME

1. Introduction

Godalming Town Council (the Council) recognises the need to retain documentation for audit purposes, staff management, tax liabilities and the eventuality of legal disputes and proceedings.

In agreeing a document retention scheme, the Council has addressed these needs, and taken into account its obligations under the Local Government Act 1972, the Audit Commission Act 1998, the Public Records Act 1958, the Data Protection Act 1998, the Employers' Liability (Compulsory Insurance) Regulations 1998, the Limitation Act 1980, the Employment Rights Act 1996, the Local Authorities Cemeteries Order 1977, the Local Government (Records) Act 1962, the Freedom of Information Act 2000 and the Lord Chancellor's Code of Practice on the Management of Records Code 2002.

2. Retention of Documents for Legal Purposes

Most legal proceedings are governed by the Limitation Act 1980. The 1980 Act provides that legal claims may not be commenced after a specified period. The specified period varies, depending on the type of claim in question. The table below sets out the limitation periods for the different categories of claim.

Category	Limitation Period
Negligence (and other torts)	6 years
Defamation	1 year
Contract	6 years
Leases	12 years
Sums recoverable by statute	6 years
Personal Injury	3 years
To recover land	12 years
Rent	6 years
Breach of trust	None

Some types of legal proceedings may fall into two or more categories. In these circumstances, the documentation should be kept for the longest of the differing limitation periods.

As there is no limitation period in respect of trusts, the Council will never destroy trust deeds and schemes and other similar documentation.

Some limitation periods can be extended. Examples include:

- where individuals first become aware of damage caused at a later date (e.g. in the case of personal injury);
- where damage is latent (e.g. to a building);
- where a person suffers from a mental incapacity; and

- where there has been a mistake or where one party has defrauded another or concealed relevant facts.

In such circumstances, the Council will consider the costs of storing relevant documents and the risks of:

- claims being made;
- the value of the claims; and
- the inability to defend any claims made should relevant documents be destroyed.

3. Document Retention Schedule

The Council has agreed a minimum document retention schedule, based on the obligations under the previously named acts, codes, orders and regulations.

DOCUMENT	MINIMUM RETENTION PERIOD	REASON
Minute books	Indefinite	Archive
Agendas	10 years	Management
Scale of fees and charges	6 years	Management
Receipt and payments account(s)	Indefinite	Archive
Receipt books of all kinds, including ledgers	6 years	VAT
Bank statements, including savings/deposit accounts	Last completed audit year	Audit
Bank paying-in books	Last completed audit year	Audit
Cheque book stubs	Last completed audit year	Audit
Quotations and tenders	6 years after completion of contract	Limitation Act 1980
Paid invoices	6 years	VAT
Paid cheques	6 years	Limitation Act 1980
VAT records, P60s and P45s	6 years	VAT, Tax
Petty cash, postage and telephone books	6 years	Tax, VAT, Limitation Act 1980
Timesheets	Last completed audit year	Audit
Wages books	12 years	Superannuation
Insurance policies	While valid	Management
Certificates for insurance against liability for employees	40 years from date on which the insurance commenced or was renewed	Employers' Liability (Compulsory Insurance) Regulations 1998, Management
Investments	Indefinite	Audit, Management
Title deeds, leases, agreements, contracts	Indefinite	Audit, Management
Members' allowances register	6 years	Tax, Limitation Act 1980
Information from other bodies	Retained as long as relevant	Management
Correspondence and emails	As required for reference	Limitation Act 1980
Local /Historical Information	Indefinite	For the benefit of the Parish
Accident book	6 years	Reporting of Injuries, Diseases and Dangerous Occurrences Act 2013

Annual accounts and asset registers	Indefinite	Archive
Pension contribution records	6 years	Pensions Act 2014
Personnel records, including SSP and maternity records	6 years	Limitations Act 1980
Asbestos and hazardous materials records	Indefinite	Asbestos Regulations
Job applications	Duration of employment for successful applicant, 1 month after vacancy filled others.	Management
Previous versions of policies, standing orders, schemes of delegation	3 years	Data Protection Act 1998
For halls, centre, recreation grounds <ul style="list-style-type: none"> • Application for hire • Lettings diaries • Copies of bills to hirers • Record of tickets issued 	6 years	VAT
For allotments <ul style="list-style-type: none"> • Register and plans 	Indefinite	Audit, Management
For burial grounds <ul style="list-style-type: none"> • Register of fees collected • Register of burials • Register of purchased graves • Register/plan of grave spaces • Register of memorials • Application for interment • Application for rights to erect memorials • Disposal certificates • Copy certificates of grant of exclusive right of burial 	Indefinite	Archives, Local Authorities Cemeteries Order 1977

The need to retain any documents not included in the above schedule should be considered on an individual basis. As a guide, and in the absence of any prevailing act, code, order or regulation to the contrary, documents may be destroyed if they are no longer of use or relevant. If in any doubt, advice should be sought from the Town Clerk.

INFORMATION & DATA PROTECTION POLICY

INTRODUCTION

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

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

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

The Council will periodically review and revise this policy in the light of experience, comments from data subjects and guidance from the Information Commissioner's Office.

The Council will be as transparent as possible about its operations and will work closely with public, community and voluntary organisations. Therefore, in the case of all information which is not personal or confidential, it will be prepared to make it available to partners and members of the town's communities. Details of information which is routinely available is contained in the Council's Publication Scheme, which is based on the statutory model publication scheme for local councils.

PROTECTING CONFIDENTIAL OR SENSITIVE INFORMATION

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

The General Data Protection Regulation (GDPR) seeks to strike a balance between the rights of individuals and the sometimes, competing interests of those such as the Council with legitimate reasons for using personal information.

The policy is based on the premise that personal data must be:

- Processed fairly, lawfully and in a transparent manner in relation to the data subject;
- Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes;
- Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- Accurate and, where necessary, kept up to date;
- Kept in a form that permits identification of data subjects for no longer than is necessary for the purposes for which the personal data is processed;
- Processed in a manner that ensures appropriate security of the personal data including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

DATA PROTECTION TERMINOLOGY

Data Subject - means the person whose personal data is being processed. That may be an employee, prospective employee, associate or prospective associate of the Council or someone transacting with it in some way, or an employee, Member or volunteer with one of our clients, or persons transacting or contracting with one of our clients when we process data for them.

Personal Data - means any information relating to a natural person or data subject that can be used directly or indirectly to identify the person. It can be anything from a name, a photo, and an address, date of birth, an email address, bank details, and posts on social networking sites or a computer IP address.

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

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

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

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

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

Godalming Town Council processes **personal data** in order to:

- fulfil its duties as an employer by complying with the terms of contracts of employment, safeguarding the employee and maintaining information required by law;
- pursue the legitimate interests of its business and its duties as a public body, by fulfilling contractual terms with other organisations, and maintaining information required by law;
- monitor its activities including the equality and diversity of its activities;
- fulfil its duties in operating the business premises including security;

- assist regulatory and law enforcement agencies;
- process information including the recording and updating details about its Councillors, employees, partners and volunteers;
- process information including the recording and updating details about individuals who contact it for information, or to access a service, or make a complaint;
- undertake surveys, censuses and questionnaires to fulfil the objectives and purposes of the Council;
- undertake research, audit and quality improvement work to fulfil its objects and purposes; and
- carry out Council administration.

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

The Council will ensure that at least one of the following conditions is met for personal information to be considered fairly processed:

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

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

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

WHO IS RESPONSIBLE FOR PROTECTING A PERSON'S PERSONAL DATA?

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

- Email: townclerk@godalming-tc.gov.uk
- Phone: 01483 523575
- Correspondence: The Town Clerk, Godalming Town Council, Municipal buildings, Bridge Street, Godalming. GU7 1HT

The Town Council has also appointed an external Data Protection Officer to ensure compliance with Data Protection legislation who may be contacted at: Satswana Ltd.
Email: info@satswana.com / Telephone: 01252 516898

PROTECTING PERSONAL DATA

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

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

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

INFORMATION PROVIDED TO US

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

THE COUNCILS RIGHT TO PROCESS INFORMATION

General Data Protection Regulations (and Data Protection Act) Article 6 (1) (a) (b) and (e)
Processing is with consent of the data subject, or
Processing is necessary for compliance with a legal obligation.
Processing is necessary for the legitimate interests of the Council.

INFORMATION SECURITY

The Council has measures in place to ensure the security of personal data. We make sure that your information is protected from unauthorised access, loss, manipulation, falsification, destruction or unauthorised disclosure. This is done through appropriate technical measures and appropriate policies.

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

CHILDREN

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

RIGHTS OF A DATA SUBJECT

Access to Information: an individual has the right to request access to the information we have on them. They can do this by contacting the Town Clerk.

Information Correction: If they believe that the information we have about them is incorrect, they may contact us so that we can update it and keep their data accurate. Please contact the Town Clerk.

Information Deletion: If the individual wishes the Council to delete the information about them, they can do so by contacting the Town Clerk.

Right to Object: If an individual believes their data is not being processed for the purpose it has been collected for, they may object by contacting the Town Clerk.

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

Complaints: If an individual has a complaint regarding the way their personal data has been processed, they may make a complaint to the Town Clerk or the Information Commissioner's Office casework@ico.org.uk Tel: 0303 123 1113.

The Council will always give guidance on personnel data to employees through the Employee Handbook.

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

MAKING INFORMATION AVAILABLE

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

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

All formal meetings of Godalming Town Council and its committees are subject to statutory notice being given on notice boards, the Website and sent to the local media. The Town Council publishes an annual programme in May each year. All formal meetings are open to the public and press and reports to those meetings and relevant background papers are available for the public to see. The Council welcomes public participation and has a public participation session on each Council and committee meeting. Details can be seen in the Council's Standing Orders, which are available on its Website or at its Offices.

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

The Openness of Local Government Bodies Regulations 2014 requires written records to be made of certain decisions taken by officers under delegated powers. These are not routine operational and administrative decisions such as giving instructions to the workforce or paying an invoice approved by Council, but would include urgent action taken after consultation with the Chairman, such as responding to a planning application in advance of Council. In other words, decisions which would have been made by Council or committee had the delegation not been in place.

The 2014 Regulations also amend the Public Bodies (Admission to Meetings) Act 1960 to allow the public or press to film, photograph or make an audio recording of council and committee meetings normally open to the public. The Council will where possible facilitate such recording unless it is being disruptive. It will also take steps to ensure that children, the vulnerable and members of the public who object to being filmed are protected without undermining the broader purpose of the meeting.

The Council will be pleased to make special arrangements on request for persons who do not have English as their first language or those with hearing or sight difficulties.

DISCLOSURE INFORMATION

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

DATA TRANSPARENCY

The Council has resolved to act in accordance with the Code of Recommended Practice for Local Authorities on Data Transparency (September 2011). This sets out the key principles for local authorities in creating greater transparency through the publication of public data and is intended to help them meet obligations of the legislative framework concerning information.

“Public data” means the objective, factual data on which policy decisions are based and on which public services are assessed, or which is collected or generated in the course of public service delivery.

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

The principles of the Code are:

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

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

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

Adopted by Godalming Town Council:
Review Date: (Relevant date)

THE MANAGEMENT OF TRANSFERABLE DATA POLICY

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1 PURPOSE

- 1.1 This policy supports the controlled storage and transfer of information by Councillors and all employees, temporary staff and agents (contractors, consultants and others working on behalf of the Council) who have access to and use of computing equipment that is owned or leased by (Your Council Name).
- 1.2 Information is used throughout the Council and is sometimes shared with external organisations and applicants. The use of removable media may result in the loss of the ability to access information, or interference with the integrity of information, which could have a significant effect on the efficient operation of the Council and may result in financial loss and an inability to provide services to the public.
- 1.3 It is therefore essential for the continued operation of the Council that the availability, integrity and confidentiality of all storage devices are maintained at a level which is appropriate to the Council's needs.
- 1.4 The aims of the policy are to ensure that the use of removable storage devices is accomplished with due regard to:
 - Enabling the correct data to be made available where it is required
 - Maintaining the integrity of the data
 - Preventing unintended consequences to the stability of the computer network
 - Building confidence and trust in data that is being shared between systems
 - Maintaining high standards of care towards data and information about individual parishioners, staff or information that is exempt from disclosure
 - Compliance with legislation, policies or good practice requirements

2 PRINCIPLES

- 2.1 This policy sets out the principles that will be adopted by the Council in order for material to be safely stored on removable media so that the risk of loss or corruption to work data is low.
- 2.2 Removable media includes but is not limited to:

USB memory sticks, memory cards, portable memory devices, CD/DVDs, diskettes and any other device that transfers data between systems, or stores electronic data separately from email or other applications.
- 2.3 Any person who intends to store Council data on removable media must abide by this policy. This requirement devolves to Councillors, employees and agents of the Council, who may be held personally liable for any breach of the requirements of this policy.
- 2.4 Failure to comply with this policy could result in disciplinary action.

3 ADVICE AND ASSISTANCE

- 3.1 The Town Clerk will ensure that everyone that is authorised to access the Councils information systems is aware of their obligations arising from this policy.
- 3.2 A competent person should be consulted over any hardware or system issues. Advice and guidance on using software packages should be also sort from a competent person.

4 RESPONSIBILITIES

- 4.1 The Town Clerk is responsible for enforcing this policy and for having arrangements in place to identify the location of all data used in connection with Council business.
- 4.2 Users of removable media must have adequate training so that relevant policies are implemented.

5 INCIDENT MANAGEMENT

- 5.1 It is the duty of all employees and agents of the Council to not allow storage media to be compromised in any way whilst in their care or under their control. There must be immediate reporting of any misuse or irresponsible actions that affect work data or information, any loss of material, or actual, or suspected breaches in information security to the Town Clerk.
- 5.2 It is the duty of all Councillors/Employees to report any actual or suspected breaches in information security to the Town Clerk.

6 DATA ADMINISTRATION

- 6.1 Removable media should not be the only place where data created or obtained for work purposes is held, as data that is only held in one place and in one format is at much higher risk of being unavailable through loss, destruction or malfunction of equipment, than data which is routinely backed up.
- 6.2 Where removable media is used to transfer material between systems then copies of the data should also remain on the source system or computer, until the data is successfully transferred to another computer or system.
- 6.3 Where there is a business requirement to distribute information to third parties, then removable media must only be used when the file cannot be sent or is too large to be sent by email or other secure electronic means.
- 6.4 Transferring material to removable media is a snapshot of the data at the time it was saved to the media. Adequate labelling must be undertaken so as to easily identify the version of the data, as well as its content.
- 6.5 Files must be deleted from removable media, or the removable media destroyed, when the operational use of the material has been completed. The Council's retention and disposition schedule must be implemented by Councillors, employees, contractors and agents for all removable media.

7 SECURITY

- 7.1 All storage media must be kept in an appropriately secure and safe environment that avoids physical risk, loss or electrical corruption of the business asset. Due to their small size there is a high risk of the removable media being mislaid lost or damaged, therefore, special care is required to physically protect the device and the data. Anyone using removable media to transfer data must consider the most appropriate way to transport the device and be able to demonstrate that they took reasonable care to avoid damage or loss.
- 7.2 Virus Infections must be prevented from damaging the Councils network and computers. Virus and malware checking software approved by the Council, must be operational on both the machine from which the data is taken and the machine on to which the data is to be loaded. The data must be scanned by the virus checking software, before the media is loaded on to the receiving machine.

7.3 Any memory stick used in connection with Council equipment or to store Council material should usually be Council owned. However work related data from external sources can be transferred to the Council network using memory sticks that are from trusted sources and have been checked using current anti-virus software.

7.4 The Council will not provide support or administrator access for any non-council memory stick.

8 USE OF REMOVABLE MEDIA

8.1 Care must be taken over what data or information is transferred onto removable media. Only the data that is authorised and necessary to be transferred should be saved on to the device.

8.2 Council material belongs to the Council and any equipment on which it is held should be under the control of the Council and not available to be used for other purposes that may compromise the data.

8.3 All data transferred to removable media should be in accordance with an agreed process established by the Council so that material can be traced.

8.4 The person arranging the transfer of data must be authorised to make use of, or process that particular data.

8.5 Whilst in transit or storage the data must be given appropriate security according to the type of data and its sensitivity.

8.6 Encryption must be applied to the data file unless there is no risk to the Council, other organisations or individuals from the data being lost whilst in transit or storage. If encryption is not available then password control must be applied if removable media must be used for the business purpose.

9 FAULTY OR UNNEEDED STORAGE DEVICES

9.1 Damaged or faulty media must not be used. The Town Clerk must be consulted over any damaged equipment, peripherals or media.

9.2 All unneeded or faulty storage devices must be dealt with securely to remove the data before reallocating or disposing of the device.

10 BREACH PROCEDURES

10.1 Users who do not adhere to this policy will be dealt with through the Council's disciplinary process.

10.2 Where external service providers, agents or contractors breach the policy, this should be addressed through contract arrangements.

11 REVIEW AND REVISION

11.1 This policy will be reviewed by the Council and revised according to developments in legislation, guidance, accepted good practice and operational use.

12 EMPLOYEES GUIDE IN BRIEF

- Data and information are valuable and must be protected.
- Only transfer data onto removable media, if you have the authority to do so.

- All transfer arrangements carry a risk to the data.
- Run the virus checking programme on the removable media each time it is connected to a computer.
- Only use approved products for Council data.
- Activate encryption on removable media wherever it is available and password protection if not available
- Data should be available for automatic back up and not solely saved to removable media.
- Delete files from removable media, or destroy the media, after the material has been used for its purpose.