

GODALMING TOWN COUNCIL

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Municipal Buildings
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1 September 2017

I HEREBY SUMMON YOU to attend the **POLICY & MANAGEMENT COMMITTEE** Meeting to be held in the Council Chamber, Municipal Buildings, Bridge Street, Godalming on THURSDAY, 7 SEPTEMBER 2017 at 7.00 pm.

Andy Jeffery
Acting Town Clerk

Committee Members: Councillor Reynolds – Chairman
Councillor A Bott – Vice Chairman

Councillor P Martin
Councillor Poulter
Councillor Wheatley
Councillor Hunter
Councillor Noyce
Councillor Williams
Councillor Bolton
Councillor Walden
Councillor Wainwright

Councillor Gordon-Smith
Councillor Cosser
Councillor T Martin
Councillor S Bott
Councillor Welland
Councillor Pinches
Councillor Gray
Councillor Purkiss

AGENDA

1. MINUTES

To approve as a correct record the minutes of the meeting held on the 13 July 2017, a copy of which has been circulated previously.

2. APOLOGIES FOR ABSENCE

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

The Chairman to allow members of the public to ask the Council questions, 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. PLANNING MATTERS

Members to consider planning applications as required by SO 96, xxi.

No referrals received.

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

6. COMMITTEE WORK PROGRAMME

The Committee's work programme is attached for the information of Members.

7. ACCOUNTS PAID SINCE LAST MEETING & SCHEDULE OF PAYMENTS

Town Clerk to report on the accounts paid since the last meeting.

A schedule of the accounts paid will be tabled for the information of Members. The vouchers relating to these payments will also be tabled at the meeting for inspection. All payments made are in line with the agreed budget or other resolution of this Committee or Full Council.

Members to agree that the Chairman should sign the schedule of accounts paid.

8. BUDGET MONITORING REPORT

Due to timing of end of month accounts and agenda distribution it is not possible to attach the monitoring report to the agenda. However, it will be distributed to all Members prior to the meeting and formally tabled at the meeting.

9. ACTION TAKEN UNDER THE TOWN CLERK'S DELEGATED AUTHORITY

Members to note that in consultation with the Vice Chairman of this committee (due to the Chairman being on leave) the Acting Town Clerk has, on the grounds of urgency, taken action under delegated authority to maintain future business continuity and security of IT systems relating to the acquisition of Godalming Museum at a cost of £1,547 funded from the Museum Cost centre.

10. UPDATE ON THE NEIGHBOURHOOD PLAN

Members to receive the minutes of the Neighbourhood Plan Ad-Hoc Advisory Committee 19 June and 17 July 2017 (previously distributed).

Members to receive an update from the Chairman of the Neighbourhood Plan Ad Hoc Advisory Group.

11. RESOURCES WORKING GROUP

The Resources Working Group is a working group of the Policy & Management Committee, as such it is the role of this committee to receive its report, consider any recommendations and where necessary put its recommendations to Full Council. Linked to this is the responsibility of the Staffing Committee to consider the outcomes in relation to staffing and how those outcomes should be implemented.

In order to expedite the work of the Resources Working Group, Members are requested to resolve to:

- Authorise the Chairman of the Resources Working Group to present the outcomes of its report as they pertain to staffing matters at an extraordinary meeting of the Staffing Committee on 14 September, in order for that committee to consider at its next scheduled meeting (21 September) how any potential staff-related recommendations from the Policy & Management Committee should be implemented.
- Request the Chairman of this committee to call an extraordinary meeting of the committee for 7pm on Thursday 5 October 2017 in the Council Chamber in order to consider the outcomes of the Resources Working Group and, where necessary, to formulate its recommendations to Full Council.

- Request that the Mayor, acting as Chairman of the Council calls an extraordinary meeting of the Full Council in the Council Chamber on Thursday, 5 October at 8pm, or on conclusion of the preceding meeting of the Policy & Management Committee, whichever is the later, in order to consider the recommendations of the Policy & Management Committee relating to the work of the Resources Working Group.

12. GODALMING FIREWORKS

Members to receive the budget for Godalming Fireworks 2017 (attached for the information of Members) and an oral update on the event planning so far from the Acting Town Clerk.

13. GENERAL DATA PROTECTION REGULATIONS (GDPR)

The GDPR, which replaces the Data Protection Act 1998, will apply to the United Kingdom as of 25 May 2018. The government has confirmed the decision to leave the EU will not affect the commencement of the GDPR.

The Information Commissioner has stated that “There is no time to delay in preparing for the biggest change to data protection law for a generation.....If your organisation cannot demonstrate that good data protection is the cornerstone of your business policy & protection, you are leaving your organisation open to enforcement action that can damage both public reputation and bank balance.”

As such, through membership of the Society of Local Council Clerks (SLCC) both the ATC & ARFO conducted a web-based training session to gain an understanding of how the GDPR will impact on the Council.

Members need to be aware that the GDPR introduces a number of significant changes and that Godalming Town Council must prepare for these changes. The guidance for preparing for the GDPR – ‘Preparing for the General Data Protection Regulation (GDPR) – 12 Steps To Take Now’ is attached for the information of Members.

Whilst this agenda item satisfies Step 1 – Awareness, there are 11 other steps to follow. The consequences for compliance failure are significant for both the Council itself and the individuals within the organisation. As such Officers RECOMMEND that Members resolve that the Council’s HR providers, or its associated companies, are engaged to conduct a GDPR compliance audit. The audit to include policies and practices of all areas of Council business and report the findings to this committee with a clear programme for implementing any necessary changes to policy, working procedures and training requirements. The audit is to also include data sharing agreement checks with any external organisation that may have legitimate access to held data, e.g. IT support services.

Funding of the initial audit to be met from the professional fees budget.

14. BINDING OF MINUTES

Godalming Town Council has a legal duty under the Local Government Act 1972 to maintain the minutes of its Council and Committee meetings as a permanent, publicly accessible record in a paper form. Currently 7 years’ of council minutes require binding into appropriate volumes; the cost of which is £105.00 plus VAT per volume. Although it is practice to bind each year into a single volume, due to the limitations of the binding process and size of the minutes, it may prove necessary for one year’s minutes to go into two volumes. The exact requirement will not be known until the binders (Shaw & Sons) receive the minute papers.

Members are requested to resolve the approval of expenditure of up to £1,000 for the binding of the outstanding minutes. The cost to be met by the Printing, Stationery and General Office Expenses budget.

15. DIRECT DEBITS

Financial Regulation 6.6 says:

“If thought appropriate by the Council, payment for utility supplies (energy, telephone and water) and any National Non-Domestic Rates may be made by variable direct debit provided that the instructions are signed by two members and any payments are reported to the Policy & Management Committee as made. The approval of the use of a variable direct debit shall be renewed by resolution of the Policy & Management Committee at least every two years.”

In accordance with that regulation, Officers ask that the National Non-Domestic Rates for the Wilfrid Noyce Centre be added to the list of payments made by variable direct debit, in line with the Council's other two community centres.

Officers also ask that all three community centre Water Rates be paid by variable direct debit.

16. WILFRID NOYCE REFURBISHMENT PROJECT – UPDATE

Members to receive an oral update on the project so far from the Acting Town Clerk.

17. DEVOLUTION OF SERVICES

a) **Godalming Museum**

Members to receive a confidential report from the Acting Town Clerk (attached for the information of Members) relating to the transfer of Godalming Museum from Waverley Borough Council to Godalming Town Council.

b) **Public Toilets**

Members to receive a confidential report from the Acting Town Clerk (attached for the information of Members) relating to potential options for the provision of public toilet facilities at Crown Court, Godalming and North Street, Farncombe. Members are requested to resolve which options they wish officers to pursue.

18. TOWN COUNCIL REPRESENTATION ON EXTERNAL BODIES – REPORT ON THE GODALMING TRANSPORTATION TASK GROUP (SCC)

Members are asked to note that no meetings of the Godalming Transportation Task Group have occurred; consequently there is no report.

19. TOWN COUNCIL REPRESENTATION ON EXTERNAL BODIES – REPORT ON GODALMING & DISTRICT CHAMBER OF COMMERCE

Members are asked to note a report from Councillor Poulter on the Godalming & District Chamber of Commerce (report attached for the information of Members) an organisation on which Councillor Poulter represents the Town Council.

20. COMMUNICATIONS ARISING FROM THIS MEETING

Members to identify which matters, discussed at this meeting, are to be publicised.

21. DATE OF NEXT MEETING

The next meeting of the Policy & Management Committee is scheduled to be held on Thursday, 19 October 2017 at 7.00 pm in the Council Chamber.

22. ANNOUNCEMENTS

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

6. POLICY & MANAGEMENT COMMITTEE – WORK PROGRAMME

TASK	WHO?	MINUTE REF	PROGRESS	ORIGINAL TARGET COMPLETION DATE	AMENDED TARGET COMPLETION DATE	ACTUAL COMPLETION DATE
COMMUNITY CENTRES – PERFORMANCE MONITORING	Acting Town Clerk	46-16	On-going item for approximately quarterly reporting. To be reported on 19 October	On-going		
ANNUAL REVIEW OF FINANCIAL REGULATIONS	Acting Town Clerk & Acting RFO	Annual Event	To be completed annually by 31 March	31/03/18		
FARNCOMBE INITIATIVE	Cllr Cosser	274-13	Most recent report received on 15 December 2016. Further reports expected at approximately six-monthly intervals. Next report expected Nov 17	N/A		
FLOOD ALLEVIATION	Acting Town Clerk	405-13 428-14	Full Council resolved to sign a Memorandum of Understanding with other agencies and to create a £25,000 earmarked reserve for a future Flood Alleviation scheme and, in principle to contribute land if necessary. Further public consultation to be held at the Wilfrid Noyce on 8 September, Steering Group meeting on 22 September in WNC. GTC will be applying for a grant, on behalf of the Flood Alleviation Group, for £20,000 from the SSE resilience fund.	23/10/14	Spring 2018	
COMMUNICATIONS WORKING GROUP	Cllr Reynolds		Awaiting external report of social policy. Staff Members to attend SSALC social media training courses The Communications Working Group met on 17 July due to meet on 4 Sept.	21/07/16 30/09/16		
DEVOLUTION OF SERVICES FROM PRINCIPAL AUTHORITIES	Acting Town Clerk	46-16	Reported to this committee on 6 April, negotiations ongoing with WBC Item on this Agenda	12/01/17	1/10/17	

TASK	WHO?	MINUTE REF	PROGRESS	ORIGINAL TARGET COMPLETION DATE	AMENDED TARGET COMPLETION DATE	ACTUAL COMPLETION DATE
WW1 2018 (INC GODALMING WAR MEMORIAL)	Acting Town Clerk	46-16	Call for public subscription funding successful, project to proceed. Conservation Area and Listed Building Consent applied for.	12/01/17	11/11/2018	
FIREWORKS	Acting Town Clerk	173-16	Partner working group met 29 Aug in WNC. Report on this agenda.	4/11/16	3/11/2017	
CONDITION OF TREES IN THE TOWN COUNCIL'S OWNERSHIP	Acting Town Clerk	414-16	The inclusion of this matter arose from recent press coverage of a High Court case involving Witley Parish Council and a fallen tree in its ownership. Reported on 23/02/17. Further reported to this committee on 25/05/17. Last of current tree work programme completed on 22 August.	23/02/17	Nov 2018	
INVESTMENT STRATEGY	Finance Administrator	N/A	Financial Regulation (8.4) identifies the need for an Investment Strategy & Policy and Councillor Bolton drew attention to this at the last meeting of the Committee. ARFO arranging meeting with Malcolm Bookham of WBC date TBC.	6/04/17	13/7/17	
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. Item on this agenda.	25/05/17	25/05/19	

TASK	WHO?	MINUTE REF	PROGRESS	ORIGINAL TARGET COMPLETION DATE	AMENDED TARGET COMPLETION DATE	ACTUAL COMPLETION DATE
ENGAGEMENT OF INTERNAL AUDIT	Acting RFO	N/A	Standing Orders delegates the annual appointment of the Internal Auditor to this Committee and the matter is included here to ensure it happens. Letter of Engagement reviewed and approved 23/02/17. Providers for next year to be market tested. Audit Committee work programme.	23/02/17	Jan 2018	
REPRESENTATION ON EXTERNAL BODIES REPORTS:						
Sport Godalming	Cllr P Martin	51-16	Report provided	25/05/17		25/05/17
Godalming/Joigny Friendship Association	Cllr Hunter	81-15	Report provided.	25/05/17		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	TBC	
Godalming Transportation Task Group (SCC)	Cllr Walden Cllr Bolton	51-16	Report expected on this agenda	07/09/17		
Godalming & District Chamber of Commerce	Cllr Poulter	51-16	Report expected on this agenda	07/09/17		
Go Godalming Association	Cllr Gordon-Smith	51-16	Report expected 19 October 2017	19/10/17		
Holloway Hill Sports Association	Cllr T Martin	51-16	Report expected 19 October 2017	19/10/17		
Godalming Museum Trust	Cllr Gordon-Smith Cllr S Bott	51-16	Report expected 30 November 2017	30/11/17		

TASK	WHO?	MINUTE REF	PROGRESS	ORIGINAL TARGET COMPLETION DATE	AMENDED TARGET COMPLETION DATE	ACTUAL COMPLETION DATE
REPRESENTATION ON EXTERNAL BODIES REPORTS Continued						
St Mark's Community Centre Management Committee	Cllr Pinches	51-16	Report expected 30 November 2017	30/11/17		
St Mark's Community Initiative Group	Cllr Bolton	51-16	Report expected 18 January 2018	18/01/18		
Godalming Together CIC	Cllr Purkiss	51-16	Report expected 18 January 2018	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		
District Scout Council	Cllr Wheatley		Report expected (TBC)	TBC		
Fairtrade Steering Group	Cllr Wheatley		Report expected (TBC)	TBC		
Farncombe Day Centre	Cllr Gray		Report expected (TBC)	TBC		

TASK	WHO?	MINUTE REF	PROGRESS	ORIGINAL TARGET COMPLETION DATE	AMENDED TARGET COMPLETION DATE	ACTUAL COMPLETION DATE
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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 (<i>not running 2018 – Shrove Tues in School hols</i>)	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

Godalming November Event Budget 2017

THE BURYS

Item	Cost	Item	Income
Fireworks	£5,420.00		
Insurance	£1,000.00		
Safety barriers/generator	£300.00		
Labour (set up/clear down)	£900.00		
PA System	£600.00		
SIA	£250.00		
Additional advertising banners	£275.00		
	£300.00		
Misc	£45.00	Sponsorship - Chamber of Commerce	£1,000.00
Waste disposal	£100.00	Sponsorship - Cornmeter (wristbands)	£300.00
Radios	£190.00	Hot food concessions	£300.00
Transport	£250.00	Fair (donation)	£500.00
Crown Court Car Park	£145.00	Ticket sales Eventbrite	£8,440.00
First Aid (St Johns)	£45.00	Procession Torches sales (150)	£450.00
Coloured Wrist bands	£195.00	Donations	£25.00
	£10,015.00		£10,015.00
Income/expenditure	£0.00		

Preparing for the General Data Protection Regulation (GDPR)

12 steps to take now

Preparing for the General Data Protection

Regulation (GDPR) 12 steps to take now



1

Awareness

You should make sure that decision makers and key people in your organisation are aware that the law is changing to the GDPR. They need to appreciate the impact this is likely to have.

2

Information you hold

You should document what personal data you hold, where it came from and who you share it with. You may need to organise an information audit.

3

Communicating privacy information

You should review your current privacy notices and put a plan in place for making any necessary changes in time for GDPR implementation.

4

Individuals' rights

You should check your procedures to ensure they cover all the rights individuals have, including how you would delete personal data or provide data electronically and in a commonly used format.

5

Subject access requests

You should update your procedures and plan how you will handle requests within the new timescales and provide any additional information.

6

Lawful basis for processing personal data

You should identify the lawful basis for your processing activity in the GDPR, document it and update your privacy notice to explain it.

7

Consent

You should review how you seek, record and manage consent and whether you need to make any changes. Refresh existing consents now if they don't meet the GDPR standard.

8

Children

You should start thinking now about whether you need to put systems in place to verify individuals' ages and to obtain parental or guardian consent for any data processing activity.

9

Data breaches

You should make sure you have the right procedures in place to detect, report and investigate a personal data breach.

10

Data Protection by Design and Data Protection Impact Assessments

You should familiarise yourself now with the ICO's code of practice on Privacy Impact Assessments as well as the latest guidance from the Article 29 Working Party, and work out how and when to implement them in your organisation.

11

Data Protection Officers

You should designate someone to take responsibility for data protection compliance and assess where this role will sit within your organisation's structure and governance arrangements. You should consider whether you are required to formally designate a Data Protection Officer.

12

International

If your organisation operates in more than one EU member state (ie you carry out cross-border processing), you should determine your lead data protection supervisory authority. Article 29 Working Party guidelines will help you do this.

Introduction

This checklist highlights 12 steps you can take now to prepare for the General Data Protection Regulation (GDPR) which will apply from 25 May 2018.

Many of the GDPR's main concepts and principles are much the same as those in the current Data Protection Act (DPA), so if you are complying properly with the current law then most of your approach to compliance will remain valid under the GDPR and can be the starting point to build from. However, there are new elements and significant enhancements, so you will have to do some things for the first time and some things differently.

It is important to use this checklist and other Information Commissioner's Office (ICO) resources to work out the main differences between the current law and the GDPR. The ICO is producing new guidance and other tools to assist you, as well as contributing to guidance that the Article 29 Working Party is producing at the European level. These are all available via the ICO's [Overview of the General Data Protection Regulation](#). The ICO is also working closely with trade associations and bodies representing the various sectors – you should also work closely with these bodies to share knowledge about implementation in your sector.

It is essential to plan your approach to GDPR compliance now and to gain 'buy in' from key people in your organisation. You may need, for example, to put new procedures in place to deal with the GDPR's new transparency and individuals' rights provisions. In a large or complex business this could have significant budgetary, IT, personnel, governance and communications implications.

The GDPR places greater emphasis on the documentation that data controllers must keep to demonstrate their accountability. Compliance with all the areas listed in this document will require organisations to review their approach to governance and how they manage data protection as a corporate issue. One aspect of this might be to review the contracts and other arrangements you have in place when sharing data with other organisations.

Some parts of the GDPR will have more of an impact on some organisations than on others (for example, the provisions relating to profiling or children's data), so it would be useful to map out which parts of the GDPR will have the greatest impact on your business model and give those areas due prominence in your planning process.

1

Awareness

You should make sure that decision makers and key people in your organisation are aware that the law is changing to the GDPR. They need to appreciate the impact this is likely to have and identify areas that could cause compliance problems under the GDPR. It would be useful to start by looking at your organisation's risk register, if you have one.

Implementing the GDPR could have significant resource implications, especially for larger and more complex organisations. You may find compliance difficult if you leave your preparations until the last minute.

2

Information you hold

You should document what personal data you hold, where it came from and who you share it with. You may need to organise an information audit across the organisation or within particular business areas.

The GDPR requires you to maintain records of your processing activities. It updates rights for a networked world. For example, if you have inaccurate personal data and have shared this with another organisation, you will have to tell the other organisation about the inaccuracy so it can correct its own records. You won't be able to do this unless you know what personal data you hold, where it came from and who you share it with. You should document this. Doing this will also help you to comply with the GDPR's accountability principle, which requires organisations to be able to show how they comply with the data protection principles, for example by having effective policies and procedures in place.

3

Communicating privacy information

You should review your current privacy notices and put a plan in place for making any necessary changes in time for GDPR implementation.

When you collect personal data you currently have to give people certain information, such as your identity and how you intend to use their information. This is usually done through a privacy notice. Under the GDPR there are some additional things you will have to tell people. For example, you will need to explain your lawful basis for processing the data, your data retention periods and that individuals have a right to

complain to the ICO if they think there is a problem with the way you are handling their data. The GDPR requires the information to be provided in concise, easy to understand and clear language.

The ICO's [Privacy notices code of practice](#) reflects the new requirements of the GDPR.

4

Individuals' rights

You should check your procedures to ensure they cover all the rights individuals have, including how you would delete personal data or provide data electronically and in a commonly used format.

The GDPR includes the following rights for individuals:

- the right to be informed;
- the right of access;
- the right to rectification;
- the right to erasure;
- the right to restrict processing;
- the right to data portability;
- the right to object; and
- the right not to be subject to automated decision-making including profiling.

On the whole, the rights individuals will enjoy under the GDPR are the same as those under the DPA but with some significant enhancements. If you are geared up to give individuals their rights now, then the transition to the GDPR should be relatively easy. This is a good time to check your procedures and to work out how you would react if someone asks to have their personal data deleted, for example. Would your systems help you to locate and delete the data? Who will make the decisions about deletion?

The right to data portability is new. It only applies:

- to personal data an individual has provided to a controller;
- where the processing is based on the individual's consent or for the performance of a contract; and
- when processing is carried out by automated means.

You should consider whether you need to revise your procedures and make any changes. You will need to provide the personal data in a structured commonly used and machine readable form and provide the

information free of charge.

5

Subject access requests

You should update your procedures and plan how you will handle requests to take account of the new rules:

- In most cases you will not be able to charge for complying with a request.
- You will have a month to comply, rather than the current 40 days.
- You can refuse or charge for requests that are manifestly unfounded or excessive.
- If you refuse a request, you must tell the individual why and that they have the right to complain to the supervisory authority and to a judicial remedy. You must do this without undue delay and at the latest, within one month.

If your organisation handles a large number of access requests, consider the logistical implications of having to deal with requests more quickly. You could consider whether it is feasible or desirable to develop systems that allow individuals to access their information easily online.

6

Lawful basis for processing personal data

You should identify the lawful basis for your processing activity in the GDPR, document it and update your privacy notice to explain it.

Many organisations will not have thought about their lawful basis for processing personal data. Under the current law this does not have many practical implications. However, this will be different under the GDPR because some individuals' rights will be modified depending on your lawful basis for processing their personal data. The most obvious example is that people will have a stronger right to have their data deleted where you use consent as your lawful basis for processing.

You will also have to explain your lawful basis for processing personal data in your privacy notice and when you answer a subject access request. The lawful bases in the GDPR are broadly the same as the conditions for processing in the DPA. It should be possible to review the types of processing activities you carry out and to identify your lawful basis for doing so. You should document your lawful bases in order to

help you comply with the GDPR's 'accountability' requirements.

7

Consent

You should review how you seek, record and manage consent and whether you need to make any changes. Refresh existing consents now if they don't meet the GDPR standard.

You should read the [detailed guidance](#) the ICO has published on consent under the GDPR, and use our consent checklist to review your practices. Consent must be freely given, specific, informed and unambiguous. There must be a positive opt-in – consent cannot be inferred from silence, pre-ticked boxes or inactivity. It must also be separate from other terms and conditions, and you will need to have simple ways for people to withdraw consent. Public authorities and employers will need to take particular care. Consent has to be verifiable and individuals generally have more rights where you rely on consent to process their data.

You are not required to automatically 'repaper' or refresh all existing DPA consents in preparation for the GDPR. But if you rely on individuals' consent to process their data, make sure it will meet the GDPR standard on being specific, granular, clear, prominent, opt-in, properly documented and easily withdrawn. If not, alter your consent mechanisms and seek fresh GDPR-compliant consent, or find an alternative to consent.

8

Children

You should start thinking now about whether you need to put systems in place to verify individuals' ages and to obtain parental or guardian consent for any data processing activity.

For the first time, the GDPR will bring in special protection for children's personal data, particularly in the context of commercial internet services such as social networking. If your organisation offers online services ('information society services') to children and relies on consent to collect information about them, then you may need a parent or guardian's consent in order to process their personal data lawfully. The GDPR sets the age when a child can give their own consent to this processing at 16 (although this may be lowered to a minimum of 13 in the UK). If a child is younger then you will need to get consent from a person holding 'parental responsibility'.

This could have significant implications if your organisation offers online services to children and collects their personal data. Remember that consent has to be verifiable and that when collecting children's data your privacy notice must be written in language that children will understand.

9

Data breaches

You should make sure you have the right procedures in place to detect, report and investigate a personal data breach.

Some organisations are already required to notify the ICO (and possibly some other bodies) when they suffer a personal data breach. The GDPR introduces a duty on all organisations to report certain types of data breach to the ICO, and in some cases, to individuals. You only have to notify the ICO of a breach where it is likely to result in a risk to the rights and freedoms of individuals – if, for example, it could result in discrimination, damage to reputation, financial loss, loss of confidentiality or any other significant economic or social disadvantage.

Where a breach is likely to result in a high risk to the rights and freedoms of individuals, you will also have to notify those concerned directly in most cases.

You should put procedures in place to effectively detect, report and investigate a personal data breach. You may wish to assess the types of personal data you hold and document where you would be required to notify the ICO or affected individuals if a breach occurred. Larger organisations will need to develop policies and procedures for managing data breaches. Failure to report a breach when required to do so could result in a fine, as well as a fine for the breach itself.

10

Data Protection by Design and Data Protection Impact Assessments

It has always been good practice to adopt a privacy by design approach and to carry out a Privacy Impact Assessment (PIA) as part of this. However, the GDPR makes privacy by design an express legal requirement, under the term 'data protection by design and by default'. It also makes PIAs – referred to as 'Data Protection Impact Assessments' or DPIAs – mandatory in certain circumstances.

A DPIA is required in situations where data processing is likely to result in high risk to individuals, for example:

- where a new technology is being deployed;
- where a profiling operation is likely to significantly affect individuals; or
- where there is processing on a large scale of the special categories of data.

If a DPIA indicates that the data processing is high risk, and you cannot sufficiently address those risks, you will be required to consult the ICO to seek its opinion as to whether the processing operation complies with the GDPR.

You should therefore start to assess the situations where it will be necessary to conduct a DPIA. Who will do it? Who else needs to be involved? Will the process be run centrally or locally?

You should also familiarise yourself now with the [guidance the ICO has produced on PIAs](#) as well as [guidance from the Article 29 Working Party](#), and work out how to implement them in your organisation. This guidance shows how PIAs can link to other organisational processes such as risk management and project management.

11

Data Protection Officers

You should designate someone to take responsibility for data protection compliance and assess where this role will sit within your organisation's structure and governance arrangements.

You should consider whether you are required to formally designate a Data Protection Officer (DPO). You must designate a DPO if you are:

- a public authority (except for courts acting in their judicial capacity);
- an organisation that carries out the regular and systematic monitoring of individuals on a large scale; or
- an organisation that carries out the large scale processing of special categories of data, such as health records, or information about criminal convictions. The Article 29 Working Party has [produced guidance for organisations on the designation, position and tasks of DPOs](#).

It is most important that someone in your organisation, or an external data protection advisor, takes proper responsibility for your data protection compliance and has the knowledge, support and authority to carry out their role effectively.

12

International

If your organisation operates in more than one EU member state, you should determine your lead data protection supervisory authority and document this.

The lead authority is the supervisory authority in the state where your main establishment is. Your main establishment is the location where your central administration in the EU is or else the location where decisions about the purposes and means of processing are taken and implemented.

This is only relevant where you carry out cross-border processing – ie you have establishments in more than one EU member state or you have a single establishment in the EU that carries out processing which substantially affects individuals in other EU states.

If this applies to your organisation, you should map out where your organisation makes its most significant decisions about its processing activities. This will help to determine your 'main establishment' and therefore your lead supervisory authority.

The Article 29 Working party has produced [guidance on identifying a controller or processor's lead supervisory authority](#).

Report for Godalming Town Council

Meeting Thursday 7th September 2017

Godalming Chamber of Commerce

The Godalming Chamber of Commerce was formed in 1911 and re-emerged in 2009, since then it has been a vibrant voice for the business and retail community of Godalming. The Chamber has in excess of 100 members drawn from both the business and retail sectors of the community and Euan Davidson, who runs Godalming Family Mediation is their President. The Godalming Chamber holds meetings every other month, with other events taking place throughout the year. Every three months the Management Committees of the four Chambers in Waverley meet with WBC to discuss relevant topics. Building on this, the four Chamber have met several times in Godalming, independently from Waverley, in order to discuss ways that they can all work together more closely. In parallel with this, the Chamber took the decision to end their affiliation with Surrey Chambers of Commerce in order to focus more closely on the local level activities.

Godalming Chamber made a significant donation to the re-furbishment of the Wilfrid Noyce Centre and in return for this use the Centre for their meetings. The Chamber has also agreed to help fund some of the costs associated with the Fireworks night this year.

The Christmas and the Food Festivals were again a great success. The Godalming Business Network events continue to flourish, providing a platform for B2B & B2C (Business to Business & Business to Commerce) networking.

In late 2015, when Euan was Vice President, in an attempt to reach out to the "Homepreneur" market, he launched a monthly "Friday Lunch Club". This has rapidly grown into a thriving networking opportunity, successfully attracting business, retail and homepreneurs. They are held on the last Friday of each month at a variety of different venues across the town.

The Chamber, under the guidance of Sarah Alexander, a committee member, has also started to run an evening training event every other month, with topics ranging from tax efficiency to presentation skills, which is starting to build up momentum amongst members and non-members.

The Chamber continues to run a number of retail events and there was a very well-attended event at Cook in June.

The Future:

The main current focus points for the Chamber at the moment are:

1. To build up the membership base, with particular focus on trying to encourage more retailers to become active members.
2. To encourage members and non-members to take part in the variety of networking and social events that the Chamber organises and to attend and participate in the regular Chamber meetings.
3. To work more closely with the Town and Waverley councils.
4. To develop the cooperation with the other Waverley Chambers. The first annual joint Chamber's dinner is due to take place in November in Godalming and there are plans to hold a Waverley business awards in 2018 amongst other ventures.

The Godalming Chamber will continue to work with S.C.C to make Godalming a Dementia Friendly Town.

In conclusion

A strong feature of the Chamber ethos is communication and co-operation. This is substantiated by their drive to work with other partners in the town. Godalming is fortunate to have a strong Chamber of Commerce which not only works hard for both the business and retail sectors but also for the community of the town.

Joy Poulter MBE

GODALMING TOWN COUNCIL

Disclosure by a Member¹ 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]² [a non-pecuniary interest]³ in the following matter:-

COMMITTEE:

DATE:

NAME OF COUNCILLOR: _____

Please use the form below to state in which agenda items you have an interest.

Agenda No.	Subject	Disclosable Pecuniary Interest	Non-Pecuniary Interest	Reason

Signed _____

Dated _____

¹ "Member" includes co-opted member, member of a committee, joint committee or sub-committee

² 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

³ A non-pecuniary interest is defined by Section 5 (4) of the Godalming Members' Code of Conduct.