



CWMAMAN TOWN COUNCIL INFORMATION & DATA PROTECTION POLICY

Adopted February 2026

Review February 2027

Introduction

In order to conduct its business, services, and duties, Cwmaman Town 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 Categories

- 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.
- Personal data collected from individuals who have requested to receive information about events and activities.

Cwmaman Town 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.

This Policy is linked to our Privacy notice which will ensure information considerations are central to the ethos of the organisation.

Transparency

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 that is not personal or confidential, it will be prepared to make it available to partners and members of the community. Details of information that is routinely available are contained in the Council's Publication Scheme, which is based on the statutory model publication scheme for local councils.

Protecting Confidential or Sensitive Information

Cwmaman Town 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.

GDPR Compliance

The General Data Protection Regulation (GDPR), which became law on 25th May 2018, and the Data Protection Act 1998 before it, seek to strike a balance between the rights of individuals and the sometimes-competing interests of those such as the Town Council with legitimate reasons for using personal information.

Principles of Personal Data Handling

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.

Personal data: means any information relating to a natural person or data subject that can be used directly or indirectly to identify the person.

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 offenses or alleged offenses 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. City Council, employer, 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.

Data Processing Purposes

Cwmaman 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 organizations 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, give permission to receive information about activities or events 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.
- 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.

Fair Processing Conditions

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.

Sensitive Personal Data Conditions

Particular attention is paid to the processing of any sensitive personal information, and the Town 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 to protect the vital interests of the individual or another person.

Responsible Data Handling

Who is responsible for protecting a person's personal data?

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

Contact Information

Email: clerk@cwmamantc.org

Phone: 01269 823299

Correspondence: Cwmaman Community Centre, 5 High Street, Glanaman, Ammanford SA18 1DX

Data Protection Act 1998 (DPA)

Diversity Monitoring

Cwmaman Town Council monitors the diversity of its employees, and Councillors, in order to ensure that there is no inappropriate or unlawful discrimination in the way it conducts its activities. It undertakes similar data handling in respect of all prospective employees. This data will always be treated as confidential. It will only be accessed by authorised individuals within the Council and will not be disclosed to any other bodies or individuals. Diversity information will never be used as selection criteria and will not be made available to others involved in the recruitment process. Anonymised data derived from diversity monitoring will be used for monitoring purposes and may be published and passed to other bodies.

Privacy Notice

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.

Data Security

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 Cwmaman 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 Town Council is able to keep their personal data accurate and up-to-date. The personal information will be not 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.

Data Security

The Council shall implement appropriate technical and organisational measures to protect personal data from unauthorised access, disclosure, alteration, or destruction. 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. Breach Notification: In the event of a data breach, the Council will report it to the Information Commissioner's Office (ICO) and affected individuals as required by law.

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 our Town Clerk or Data Protection Officer.

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: Town Clerk.

Information Deletion

If the individual wishes the Town 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 or Data Protection Officer.

Automated Decision Making

The Town 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, Data Protection Officer or the Information Commissioners Office casework@ico.org.uk Tel: 0303 123 1113.

Making Information Available

The Publication Scheme

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.

Meeting Notices and Documentation

All formal meetings of Council and its committees are subject to statutory notice being given on notice boards, the Website and via social media. The 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 meeting. Details can be seen in the Council's Standing Orders, which are available on its Website or at its Offices. Occasionally, 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.

Recording of Meetings

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.

Filming and Recording Meetings

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.

Accessibility

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 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 and Transparency

“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.

Code Principles

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.

Government Regulations

Government has also issued a further Code of Recommended Practice on Transparency, compliance of which is compulsory for town councils with turnover (gross income or gross expenditure) not Exceeding £25,000 per annum. These councils will be exempt from the requirement to have an external audit from April 2017. Cwmaman Town Council exceeds this turnover but will never the less ensure the following information is published on its Website for ease of access:

- All transactions above £100.
- End of year accounts
- Annual Governance Statements
- Internal Audit Reports
- List of Councillor or Member responsibilities
- Details of public land and building assets
- Draft minutes of Council and committees within one month
- Agendas and associated papers no later than three clear days before the meeting.

Policy Review

This policy will be reviewed at least annually, or sooner if required, to reflect changes in legislation, guidance from the Information Commissioner's Office (ICO), Council procedures, or feedback received from data subjects.

Date of approval 23rd February 2026

Clerk signature of approval _____

Chairs signature of approval _____

Next review date February 2027

Staff/Volunteer Name _____

Signature _____ Date _____

Appendix 1

Cwmaman Town Council - Publication Scheme

This Publication Scheme is based on the Statutory Model Publication Scheme for Local Councils provided by the Information Commissioner's Office (ICO).

Introduction

Cwmaman Town Council is committed to transparency and openness in the way it conducts its business. As part of this commitment, we have adopted this Publication Scheme to make information about the Council and its operations easily accessible to the public.

This Publication Scheme outlines the categories of information we make available, where and how to access this information, and any associated charges.

Information Available Without Charge

Council Documents

- Agendas and minutes of Council meetings
- Reports presented to the Council
- Policies and procedures
- Annual reports
- Newsletters and bulletins

Finance

- Annual budget
- Financial statements and reports
- Grants and funding information
- Expenses and allowances of Council members

Council Services

- Details of services provided by the Council
- Contact information for Council departments

Information Available for a Fee

Publications

Printed copies of Council documents, reports, and publications (available upon request)

Request for Specific Information

Information not readily available through this Publication Scheme may be requested, subject to the Freedom of Information Act 2000. A fee may apply in accordance with our Fees Schedule (Below).

How to Access Information

Website

Most information can be accessed through our official website [www.cwmamantc.org].

Requesting Information

Requests for specific information should be made in writing to the Council's Data Protection Officer (DPO) at clerk@cwmamantc.org. Please clearly specify the information you are seeking.

Data Protection

Data Protection

Information about how Cwmaman Town Council processes personal data can be found in our Information & Data Protection Policy.

Charges

Charges for Information

Charges for printed copies of documents or specific information requests are detailed in the Council's Fees Schedule (Below).

Feedback and Complaints

Feedback

We welcome feedback on the accessibility and usefulness of the information provided. Please use our contact details to share your comments or suggestions.

Complaints

If you have concerns or complaints regarding our publication scheme or the information provided, please follow our Complaints Procedure (available on our website).

Fees Schedule

Introduction

This fee schedule outlines the charges associated with processing requests made under the Freedom of Information Act 2000 (FOIA) by Cwmaman Town Council. The fees are in line with FOIA regulations and are applied to recover the costs associated with responding to requests.

Fees for Access to Information

2.1. Cwmaman Town Council is committed to providing access to information in a transparent manner. However, the following fees may apply:

Standard Photocopying and Printing Charges

A4 Black and White Photocopy/Print: £0.10 per sheet.

A4 Colour Photocopy/Print: £0.30 per sheet.

Digital Media

CD/DVD with requested information: Cost of the media (e.g., CD or DVD) plus £1.00 for processing.

Postage and Packaging

Cost of postage and packaging may be charged at actual cost incurred.

Administrative Costs

In exceptional cases, where requests are particularly complex or extensive, administrative costs may be applied. These will be calculated on a case-by-case basis and communicated to the requester in advance.

Fee Waivers and Discounts

Fee waivers or reductions may be considered in cases where the Council deems it in the public interest to do so, or where the requester can demonstrate an inability to pay the fees.

Payment Method

Payment of fees shall be made by bank transfer with details provided by the council on request or through other methods as agreed with the requestor.

Review of Fees

Cwmaman Town Council reserves the right to review and amend the fee schedule as necessary. Any changes will be communicated to the public in advance.

Contact Information

For inquiries related to FOIA fees, please contact:

Freedom of Information Officer – Clerk@cwmanantc.org

References

7.1. [Freedom of Information Act 2000](#).

Appendix 2 GDPR Statement

By submitting this form, you consent to Cwmaman Town Council collecting and processing your personal data in accordance with the General Data Protection Regulation (GDPR).

We will only use your data for the following purposes:

- To administer your membership
- To communicate with you about your membership
- To send you marketing communications about our activities (you can opt out of these at any time)

We will not share your data with third parties without your consent.

You have the right to access, correct, delete, and restrict the processing of your data. You also have the right to complain to the Information Commissioner's Office if you are unhappy with how we have handled your data.

For more information about how we handle your data, please contact clerk@cwmmamantc.org