

# **ABERTILLERY AND LLANHILLETH COMMUNITY COUNCIL**

## **COMPLAINTS POLICY**

If you have a complaint, you can contact the Council in the following ways:

By telephone: (01495) 217323

By email: [clerk@abertilleryandllanhilleth-wcc.gov.uk](mailto:clerk@abertilleryandllanhilleth-wcc.gov.uk)

By letter: Council Offices, Mitre Street, Abertillery, Blaenau Gwent. NP13 1AE

This complaints procedure is aimed at dealing with those situations where a complaint has been made about the administration of the Council or about its procedures.

Complaints against staff are always dealt with as employment matters

Complaints against Councillors are dealt with by the Public Services Ombudsman.

The aim is to deal with complaints efficiently through a transparent process. The procedure deals with complaints that have not been capable of resolution on a less formal basis, or by explanations from the Clerk or Chair of Council. It gives the complainant the assurance that their grievance has been properly and fully considered.

How we will deal with your complaint:

- We will acknowledge receipt of your complaint within five working days and investigate your complaint within 20 working days. If we cannot meet these deadlines we will inform you of the reasons why.
- Your complaint will be treated as confidential unless it is a matter which must be reported such as illegal activity.
- We will deal with your concern in an open and honest way and ensure that any of your future dealings with the Council do not suffer because you have expressed a concern or made a complaint.
- If you are making a complaint on behalf of someone else we will need to satisfy ourselves that you have the authority to act on behalf of the person concerned.
- If the nature of the complaint has already been dealt with by an external body then the Clerk may decide no further action to be taken and will communicate the decision and reason why to the complainant

Process for making a complaint:

- All formal complaints must be in writing addressed to the Clerk of the Council. This may be in the form of written correspondence either by letter or email.
- The Clerk will respond to your complaint following investigation of the matter concerned within the appropriate timescale.
- If the complaint is against any member of staff, this will be referred to the Human Resources Committee.
- If you are dissatisfied with the response you receive then you may ask for the complaint to be dealt with by the Complaints Committee of the Council, which will comprise of four elected members, to be chosen by the Clerk in consultation with the Chairman of the Council, depending on the nature of the complaint. The complainant will be invited to attend a meeting of the Complaints Committee to present their case and bring such representation as they wish. The decision of the Committee will be confirmed in writing within 7 working days of the Committee meeting and making a decision, together with

*Adopted 29 October 2025.*

details of any action taken or recommended. This decision is final.

- All complaints about the conduct of Councillors must be addressed to the Public Services Ombudsman for Wales at 1 Ffordd Yr Hen Gae, Pencoed, CF35 5LJ.

# Model publication scheme

## Freedom of Information Act

This model publication scheme has been prepared and approved by the Information Commissioner. It may be adopted without modification by any public authority without further approval and will be valid until further notice.

This publication scheme commits an authority to make information available to the public as part of its normal business activities. The information covered is included in the classes of information mentioned below, where this information is held by the authority. Additional assistance is provided to the definition of these classes in sector specific guidance manuals issued by the Information Commissioner.

The scheme commits an authority:

- To proactively publish or otherwise make available as a matter of routine, information, including environmental information, which is held by the authority and falls within the classifications below.
- To specify the information which is held by the authority and falls within the classifications below.
- To proactively publish or otherwise make available as a matter of routine, information in line with the statements contained within this scheme.
- To produce and publish the methods by which the specific information is made routinely available so that it can be easily identified and accessed by members of the public.
- To review and update on a regular basis the information the authority makes available under this scheme.
- To produce a schedule of any fees charged for access to information which is made proactively available.
- To make this publication scheme available to the public.
- To publish any dataset held by the authority that has been requested, and any updated versions it holds, unless the authority is satisfied that it is not appropriate to do so; to publish the dataset, where reasonably practicable, in an electronic form that is capable of re-use; and, if any information in the dataset is a relevant copyright work and the public

authority is the only owner, to make the information available for re-use under the terms of the Re-use of Public Sector Information Regulations 2015, if they apply, and otherwise under the terms of the Freedom of Information Act section 19.

The term 'dataset' is defined in section 11(5) of the Freedom of Information Act. The term 'relevant copyright work' is defined in section 19(8) of that Act.

## Classes of information

### **Who we are and what we do.**

Organisational information, locations and contacts, constitutional and legal governance.

### **What we spend and how we spend it.**

Financial information relating to projected and actual income and expenditure, tendering, procurement and contracts.

### **What our priorities are and how we are doing.**

Strategy and performance information, plans, assessments, inspections and reviews.

### **How we make decisions.**

Policy proposals and decisions. Decision making processes, internal criteria and procedures, consultations.

### **Our policies and procedures.**

Current written protocols for delivering our functions and responsibilities.

### **Lists and registers.**

Information held in registers required by law and other lists and registers relating to the functions of the authority.

### **The services we offer.**

Advice and guidance, booklets and leaflets, transactions and media releases. A description of the services offered.

The classes of information will not generally include:

- Information the disclosure of which is prevented by law, or exempt under the Freedom of Information Act, or is otherwise properly considered to be protected from disclosure.
- Information in draft form.
- Information that is no longer readily available as it is contained in files that have been placed in archive storage, or is difficult to access for similar reasons.

- Information the disclosure of which is prevented by law, or exempt under the Freedom of Information Act, or is otherwise properly considered to be protected from disclosure.
- Information in draft form.
- Information that is no longer readily available as it is contained in files that have been placed in archive storage, or is difficult to access for similar reasons.

## The method by which information published under this scheme will be made available

The authority will indicate clearly to the public what information is covered by this scheme and how it can be obtained.

Where it is within the capability of a public authority, information will be provided on a website. Where it is impracticable to make information available on a website or when an individual does not wish to access the information by the website, a public authority will indicate how information can be obtained by other means and provide it by those means.

In exceptional circumstances some information may be available only by viewing in person. Where this manner is specified, contact details will be provided. An appointment to view the information will be arranged within a reasonable timescale.

Information will be provided in the language in which it is held or in such other language that is legally required. Where an authority is legally required to translate any information, it will do so.

Obligations under disability and discrimination legislation and any other legislation to provide information in other forms and formats will be adhered to when providing information in accordance with this scheme.

## Charges which may be made for information published under this scheme

The purpose of this scheme is to make the maximum amount of information readily available at minimum inconvenience and cost to the public. Charges made by the authority for routinely published material will be justified and transparent and kept to a minimum.

Material which is published and accessed on a website will be provided free of charge.

Charges may be made for information subject to a charging regime specified by Parliament.

Charges may be made for actual disbursements incurred such as:

- photocopying
- postage and packaging
- the costs directly incurred as a result of viewing information

Charges may also be made for information provided under this scheme where they are legally authorised, they are in all the circumstances, including the general principles of the right of access to information held by public authorities, justified and are in accordance with a published schedule or schedules of fees which is readily available to the public.

Charges may also be made for making datasets (or parts of datasets) that are relevant copyright works available for re-use. These charges will be in accordance with the terms of the Re-use of Public Sector Information Regulations 2015, where they apply, or with regulations made under section 11B of the Freedom of Information Act or with other statutory powers of the public authority.

If a charge is to be made, confirmation of the payment due will be given before the information is provided. Payment may be requested prior to provision of the information.

## Written requests

Information held by a public authority that is not published under this scheme can be requested in writing, when its provision will be considered in accordance with the provisions of the Freedom of Information Act.

# Guide to Information available from Abertillery and Llanhilleth Community Council under the model publication scheme

This template guide covers only information we currently hold. If we do not hold some of the information listed below, we will mark it as 'N/A' in the table.

| <b>Information to be published</b>                                                                                                                                                                                              | <b>How the information can be obtained</b> | <b>Cost</b>                                                              |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------|--------------------------------------------------------------------------|
| <p><b>Class 1 - Who we are and what we do</b></p> <p>Information about us, structures, locations and contacts</p> <p>Current information only</p>                                                                               | (hard copy and web site)                   | <p>Website:<br/>FOC</p> <p>Hard Copy<br/>– (see schedule of charges)</p> |
| <p>Who's who on the Council and its Committees:</p> <p>list of Council's members, party affiliation (if any), office held and, if relevant, the ward each member represents</p>                                                 | (hard copy <i>and</i> website)             | <p>Website:<br/>FOC</p> <p>Hard Copy<br/>– (see schedule of charges)</p> |
| <p>A telephone number and generic email address as well as postal address. Where possible, provide the contact details for Clerk and Council members (including co-opted members), with telephone number, and email address</p> | (hard copy <i>and</i> website)             | <p>Website:<br/>FOC</p> <p>Hard Copy<br/>– (see schedule of charges)</p> |
| <p>Location of main Council office and accessibility details</p>                                                                                                                                                                | Website                                    | FOC                                                                      |
| <p>Staffing structure</p>                                                                                                                                                                                                       | Website                                    | FOC                                                                      |

|                                                                                                                                                                                                                                                                  |                                |                                                                 |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------|-----------------------------------------------------------------|
| Gender Pay Gap Reporting in line with the Government's guidance on the <a href="#">gender pay gap reporting</a> (if applicable)                                                                                                                                  |                                |                                                                 |
| <b>Class 2 – What we spend and how we spend it</b><br><br>Financial information relating to projected and actual income and expenditure, procurement, contracts and financial audit<br><br>Provide this information for the current and previous financial year. | (hard copy or website)         | Website:<br>FOC<br><br>Hard Copy<br>– (see schedule of charges) |
| Annual audited accounts                                                                                                                                                                                                                                          | (hard copy <i>and</i> website) | Website:<br>FOC<br><br>Hard Copy<br>– (see schedule of charges) |
| Finalised budget                                                                                                                                                                                                                                                 | (hard copy <i>and</i> website) | Website:<br>FOC<br><br>Hard Copy<br>– (see schedule of charges) |
| Precept                                                                                                                                                                                                                                                          | (hard copy <i>and</i> website) | Website:<br>FOC<br><br>Hard Copy<br>– (see schedule of charges) |
| Borrowing Approval letter                                                                                                                                                                                                                                        | N/A                            |                                                                 |

|                                                                                                                                                                                                                                    |                                |                                                                       |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------|-----------------------------------------------------------------------|
| Financial Standing Orders and Regulations                                                                                                                                                                                          | (hard copy <i>and</i> website) | Website:<br>FOC<br><br>Hard Copy<br>– (see<br>schedule of<br>charges) |
| Grants given and received                                                                                                                                                                                                          | (hard copy <i>and</i> website) | Website:<br>FOC<br><br>Hard Copy<br>– (see<br>schedule of<br>charges) |
| List of current contracts awarded and value of contract                                                                                                                                                                            | Hard Copy                      | Hard Copy<br>– (see<br>schedule of<br>charges)                        |
| Members' allowances and expenses                                                                                                                                                                                                   | (hard copy or website)         | Website:<br>FOC<br><br>Hard Copy<br>– (see<br>schedule of<br>charges) |
| Statement of payments made to all elected members                                                                                                                                                                                  | Hard copy                      | Hard Copy<br>– (see<br>schedule of<br>charges)                        |
| <b>Class 3 – What our priorities are and how we are doing</b><br><br>Strategies and plans, performance indicators, audits, inspections and reviews<br><br>As a minimum, provide this information for the current and previous year | (hard copy or website)         | Website:<br>FOC<br><br>Hard Copy<br>– (see<br>schedule of<br>charges) |
| Community Plan                                                                                                                                                                                                                     | N/A                            |                                                                       |

|                                                                                                                                                                                                                                                                                           |                                |                                                                       |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------|-----------------------------------------------------------------------|
| Annual Report                                                                                                                                                                                                                                                                             | (hard copy or website)         | Website:<br>FOC<br><br>Hard Copy<br>– (see<br>schedule of<br>charges) |
| Local charters drawn up in accordance with WG and Welsh Local Government Association (WLGA) guidelines                                                                                                                                                                                    | Hard Copy if applicable        | Hard Copy<br>– (see<br>schedule of<br>charges)                        |
| Data Protection impact assessments (in full or summary format) or any other impact assessment (eg Health & Safety Impact Assessment, Equality Impact Assessments etc), as appropriate and relevant                                                                                        | Hard Copy if applicable        | Hard Copy<br>– (see<br>schedule of<br>charges)                        |
| <p><b>Class 4 – How we make decisions</b></p> <p>Decision making processes and records of decisions</p> <p>As a minimum, provide this information for the current and previous council year</p>                                                                                           | (hard copy)                    | Hard Copy<br>– (see<br>schedule of<br>charges)                        |
| Timetable, agenda and minutes of meetings, including Council and any committee/sub-committee meetings and community meetings, unless an exemption applies to the information or parts of it. In so far as reasonably practicable, we also publish documents referred to at those meetings | (hard copy <i>and</i> website) | Website:<br>FOC<br><br>Hard Copy<br>– (see<br>schedule of<br>charges) |
| Reports presented to Council meetings, unless an exemption applies to the information or parts of it                                                                                                                                                                                      | (hard copy <i>and</i> website) | Website:<br>FOC<br><br>Hard Copy<br>– (see<br>schedule of             |

|                                                                                                                                                                                                                                                                                                    |                         |                                                              |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------|--------------------------------------------------------------|
|                                                                                                                                                                                                                                                                                                    |                         | charges)                                                     |
| Responses to consultation papers                                                                                                                                                                                                                                                                   | Hard Copy if applicable | Hard Copy – (see schedule of charges)                        |
| Responses to planning applications                                                                                                                                                                                                                                                                 | Hard Copy if applicable | Hard Copy – (see schedule of charges)                        |
| Bye-laws                                                                                                                                                                                                                                                                                           | Hard Copy if applicable | Hard Copy – (see schedule of charges)                        |
| <b>Class 5 – Our policies and procedures</b><br><br>Current written protocols, policies and procedures for delivering our services and responsibilities<br><br>Current information only                                                                                                            | (hard copy or website)  | Website:<br>FOC<br><br>Hard Copy – (see schedule of charges) |
| Policies and procedures for the conduct of Council business, eg: <ul style="list-style-type: none"> <li>• Procedural standing orders</li> <li>• Committee and sub-committee terms of reference</li> <li>• Financial Regulations</li> <li>• Code of Conduct</li> <li>• Policy statements</li> </ul> | (hard copy or website)  | Website:<br>FOC<br><br>Hard Copy – (see schedule of charges) |

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|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------|------------------------------------------------------------------|
| <p>Policies and procedures for the provision of services and about the employment of staff:</p> <ul style="list-style-type: none"> <li>• Internal policies relating to the delivery of services</li> <li>• Equality and diversity policies</li> <li>• Health and safety policy</li> <li>• Recruitment policies and current vacancies, including opportunities for becoming a co-opted member</li> <li>• Policies and procedures for handling requests for information</li> <li>• Customer Service and Complaints procedures, including those covering requests for information and operating the publication scheme</li> </ul> | (hard copy or website) | <p>Website: FOC</p> <p>Hard Copy – (see schedule of charges)</p> |
| Information security policy                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | (hard copy or website) | <p>Website: FOC</p> <p>Hard Copy – (see schedule of charges)</p> |
| Records management policies, including records retention, destruction and archive                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | (hard copy)            | Hard Copy – (see schedule of charges)                            |
| Data protection policy (including data sharing and CCTV usage) and privacy notice                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | (hard copy or website) | <p>Website: FOC</p> <p>Hard Copy – (see schedule of charges)</p> |
| Welsh Language standards, ie details of how we comply with the requirements                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | (hard copy or website) | Website: FOC                                                     |

|                                                                                                        |                                                                              |                                                           |
|--------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------|-----------------------------------------------------------|
| of the Welsh Language Act 1993 and/or the Welsh Language Measure (Wales) 2011                          |                                                                              | Hard Copy – (see schedule of charges)                     |
| <b>Class 6 – Lists and Registers</b><br><br>Currently maintained lists and registers only              | (hard copy or website; some information may only be available by inspection) | Website: FOC<br><br>Hard Copy – (see schedule of charges) |
| Any publicly available register or list, in most circumstances existing access provisions will suffice | Inspection                                                                   |                                                           |
| Assets register                                                                                        | (hard copy or website; some information may only be available by inspection) | Website: FOC<br><br>Hard Copy – (see schedule of charges) |
| Disclosure log detailing responses to previous FOI and EIR requests                                    | N/A                                                                          |                                                           |
| Register of members' interests                                                                         | (hard copy <i>and</i> website)                                               | Website: FOC<br><br>Hard Copy – (see schedule of charges) |
| Register of gifts and hospitality                                                                      | N/A                                                                          |                                                           |
| <b>Class 7 – The services we offer</b>                                                                 | (hard copy or website; some information may                                  |                                                           |

|                                                                                                                              |                                  |                                       |
|------------------------------------------------------------------------------------------------------------------------------|----------------------------------|---------------------------------------|
| Information about the services we offer, including leaflets, guidance and newsletters produced for the public and businesses | only be available by inspection) |                                       |
| Current information only                                                                                                     |                                  |                                       |
| Allotments                                                                                                                   | (hard copy)                      |                                       |
| Burial grounds and closed churchyards                                                                                        | N/A                              |                                       |
| Community centres and village halls                                                                                          | N/A                              |                                       |
| Parks, playing fields and recreational facilities                                                                            | N/A                              |                                       |
| Seating, litter bins, clocks, memorials and lighting                                                                         | N/A                              |                                       |
| Bus shelters                                                                                                                 | N/A                              |                                       |
| Markets                                                                                                                      | N/A                              |                                       |
| Public conveniences                                                                                                          | N/A                              |                                       |
| Agency agreements                                                                                                            | N/A                              |                                       |
| Services for which we are entitled to recover a fee, together with those fees (eg burial fees)                               | N/A                              |                                       |
| <b>Additional Information</b>                                                                                                |                                  |                                       |
| Any additional information published proactively that is not itemised in the lists above                                     |                                  |                                       |
| Bridges Car Scheme                                                                                                           | (hard copy)                      | Hard Copy – (see schedule of charges) |

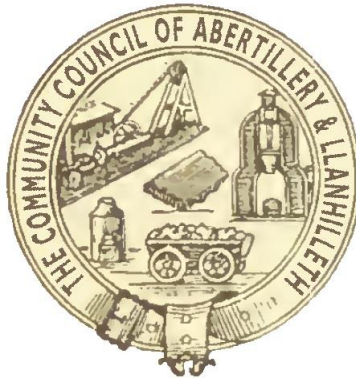
## Schedule of charges

This describes how the charges have been arrived at and should be published as part of the guide.

| <b>TYPE OF CHARGE</b>    | <b>DESCRIPTION</b>                          | <b>BASIS OF CHARGE</b>                                                                                   |
|--------------------------|---------------------------------------------|----------------------------------------------------------------------------------------------------------|
| <b>Disbursement cost</b> | Photocopying @ 1p per sheet (black & white) | Actual cost to the Council to be recharged to the recipient – if above £10                               |
|                          | Photocopying @ 5p per sheet (colour)        | Actual cost to the Council to be recharged to the recipient – if above £10                               |
|                          |                                             |                                                                                                          |
|                          | Postage                                     | Actual cost of Royal Mail standard 2 <sup>nd</sup> class to be recharged to the recipient – if above £10 |
|                          |                                             |                                                                                                          |
| <b>Statutory Fee</b>     | If applicable                               | In accordance with the relevant legislation                                                              |
|                          | Freedom of Information requests             | In line with the FOI Act and guidance in force at the time of the request.                               |
| <b>Other</b>             |                                             |                                                                                                          |

\* the actual cost incurred





## **Information and Data Protection Policy**

### **Introduction**

In order to conduct its business, services and duties, Abertillery and Llanhilleth Community 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.

Abertillery and Llanhilleth Community 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 area'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 that it must at times keep and process sensitive and personal information about both employees and the public. It has adopted this policy not only to meet its legal obligations but to ensure high standards.

The General Data Protection Regulation (GDPR) which became law on 25<sup>th</sup> May 2018, like the Data Protection Act 1998 before it, seeks to strike a balance between the rights of individuals and the

sometimes competing interests of those such as the Community 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 are 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. Community 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.

**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.

Abertillery and Llanhilleth Community Council processes **personal data** in order to:

- fulfil its duties as an employer by complying with the terms of contracts of employment,

- safeguarding employees 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 of details about its Councillors, employees, partners and volunteers
- process information including the recording and updating of 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
- 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 Community 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 Community 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: [clerk.alcc@gmail.com](mailto:clerk.alcc@gmail.com)
- Phone: 01495 217323
- Correspondence: The Town Clerk, Council Offices, Mitre Street, Abertillery, NP13 1AE

#### **Diversity Monitoring**

Abertillery and Llanhilleth Community 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 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.

The Council will always give guidance on personal 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 Area 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 Abertillery and Llanhilleth Community 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 Community 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 Council's 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 cares about ensuring 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 consent of the parent/guardian 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: Town Clerk.

**Information Deletion:** If the individual wishes the Council to delete the information it holds about them, they can request this by contacting the 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 Community 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 Commissioners Office [casework@ico.org.uk](mailto:casework@ico.org.uk) Tel: 0303 123 1113.

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 Council and its committees are subject to statutory notice being given on notice boards and the Website. The Council publishes an annual programme of meetings 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 questions opportunity at 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 are public documents.

Abertillery and Llanhilleth Community Council will ensure the following information is published on its Website for ease of access:

- End of year accounts
- Annual Governance Statements
- Internal Audit Reports
- Lists of Councillor or Member responsibilities
- Details of public land and building assets
- Minutes of Council and committee meetings
- Agendas and associated papers no later than three clear days before the meeting.

Adopted by the Council: ..... date .....

## **PRESS & MEDIA POLICY - OPTION**

### **ABERTILLERY AND LLANHILLETH COMMUNITY COUNCIL PRESS AND MEDIA POLICY**

Responses to the press relating to matters discussed by Abertillery and Llanhilleth Community Council shall be dealt with in the first instance by the Town Clerk.

Whenever possible, any information given to the press shall be given in writing so as not to leave interpretation open to misunderstanding and misreporting.

At no time shall the personal views of either members or officers of the Council be given to the press in a way which could be interpreted as a view of the Council as a whole.