



**MEMBERS OF ODIHAM PARISH COUNCIL ARE SUMMONED TO ATTEND  
THE COUNCIL MEETING OF ODIHAM PARISH COUNCIL  
AT THE BRIDEWELL, THE BURY, ODIHAM, HAMPSHIRE, RG29 1NB  
TUESDAY 21<sup>st</sup> APRIL 2026 at 7.30pm**

15<sup>th</sup> April 2026

*Andrea Mann, Clerk*

Members of the public are welcome to attend in person or online

Join Zoom Meeting

<https://us02web.zoom.us/j/86912783540?pwd=4hQEUIPXYxTUqA1oQDh9sxdBOqdY.1>

Meeting ID: 869 1278 3540

Passcode: 570080

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- 298/25 To receive apologies for absence**
- 299/25 To receive declarations of interests and requests for dispensation relating to any item on the agenda**
- 300/25 Approval of minutes**  
To approve the minutes of the Council meeting held on 17<sup>th</sup> March 2026 (274-297/25).
- 301/25 Chair's announcements**
- 302/25 Public session**  
An opportunity for residents to raise questions and issues within the Parish in accordance with Standing Orders. Please view details at <https://odihamparishcouncil.gov.uk/wp-content/uploads/2025/03/Standing-Orders-January-2026.pdf> or contact the Parish Office for further advice.

***Councillor Reports***

- 303/25 Meeting reports from councillors**  
To RECEIVE any verbal reports from Councillors on their attendance at outside meetings.
- 304/25 Reports from other councils**  
To RECEIVE any verbal reports from Hart District councillors and the Hampshire County councillor representing Odiham.

***General***

- 305/25 Meeting action points (pages 4-5)**  
To consider matters arising from the Minutes not elsewhere on the agenda
- 306/25 Policies (pages 6-27)**
- i) To review the schedule of policies and recommendations (in red) (page 6).
  - ii) To consider a new Data Protection Policy based on the HALC model template, to replace the Council's current policy (pages 7-12).
  - iii) To consider the revised Data Retention Policy, revised following a data audit as part of the annual audit process (pages 13-15).
  - iv) Privacy Notice – general (pages 16-19).



- v) Privacy Notice – staff, councillors and role holders (pages 20-24).
- vi) Subject access request policy (pages 25-27).

**307/25 2025/26 Annual Report (emailed separately)**

To review and approve the draft Annual Report for the year before presentation to the Annual Parish Assembly on 28<sup>th</sup> April the published.

**308/25 2026/27 Annual Action Plan (emailed separately)**

To review and approve the draft Annual Action Plan for the year ahead before presentation to the Annual Parish Assembly on 28<sup>th</sup> April then published.

***Amenity Areas Matters***

**309/25 Trees at the Peace Garden (emailed separately)**

To consider tree removal at the Peace Garden in response to a neighbour's request for removal and professional advice that the trees are not suitable for the location and have been planted too close to a boundary.

**310/25 Picnic benches (page 28)**

To consider additional picnic benches at OPC's open spaces..

***Community Committee Matters***

**311/25 Community Engagement App**

To consider and agree whether there is interest in researching a community engagement app promoted by the Society of Local Council Clerks <https://www.slcc.co.uk/community-engagement-app/>

**312/25 2026 Heritage Open Days <https://www.heritageopendays.org.uk/>**

To consider a request from the Odiham Society to work together for the 2027 Heritage Open Days events and whether OPC can commit to opening any OPC owned buildings this year.

***Finance Matters***

**313/25 Earmarked reserves for the financial year commencing 01.04.26 (page 29)**

To consider reserve (project) allocations, as proposed by the Finance Committee.

**314/25 Payments Listing (to follow)**

To approve the payments listing for the period 18<sup>th</sup> March-21<sup>st</sup> April 2026 and appoint two Councillors to complete the payment approval process for outstanding payments.

***Planning Matters***

**315/25 Neighbourhood Plan Monitoring Report 2026 (separate file)**

To consider the draft Neighbourhood Plan Monitoring report prepared by Cllr Verdon, to be published following adoption.

***Traffic and Transport***

**316/25 Road Safety (separate file)**

To receive update and proposed prioritisation of road safety measures, before presentation to the Annual Parish Assembly on 28<sup>th</sup> April then published.



**317/25 Date of next meetings**

Annual Parish Assembly – Tuesday 28<sup>th</sup> April.

Full Council Tuesday 19<sup>th</sup> May and 16<sup>th</sup> June 2026 at 7.30pm – to be confirmed.

***Confidential Matters***

**318/25 To pass a resolution in accordance with the Public Bodies (Admission to Meetings) Act 1960 to exclude the public and press to consider confidential contractual and staffing matters which meet the criteria of Schedule 12A of the Local Government Act 1972 Part 1**

**319/25 Chapel Cottage**

To receive any offers or feedback received following the marketing of the property.

Full Council				
Nov-25	164/25	Clerk	Change previous minutes from draft and add to website.	Complete
	165/25	CllrAMc/Clerk	Arrange letter to InOdiham to congratulate on Kings Award.	Complete
	169/25	Clerk	Submit DPI forms to Hart and show position on website.	Complete
		Council	Appoint Cllr CG to committees and positions.	Complete
	171/25	Clerk	Notify Hart of Cllr PV's appointment as joint Commons rep.	Complete
	172/25ia	Clerk	Check model Financial Regs with Internal Auditor and add to next agenda.	Complete
	172/25ib-d	Clerk	Add reviewed financial policies to website.	Complete
	172/25ii	Clerk	Combine staff related policies and circulate Staff Handbook.	Complete
	172/25iii	Clerk	Research passwords and refer Cyber Security Policy to next agenda.	Complete
	173/25	Clerk	Add new Strategy Working Group ToRs to website.	Complete
		Clerk/Strategy WG	Arrange Strategy Working Group meeting.	Complete (all Council)
	174/25	Clerk	Update website to show Amenity Areas Committee work will be covered by full Council until May '26.	Complete
	175/25ii	Clerk	Revise EMR on Scribe to allocate remaining Supporting the High St EMR to flagpoles.	
	175/25iii	Office	Confirm numbers and support with High St properties for flagpoles.	
	175/25iv	Office	Progress listed building planning application for flag poles.	
		Clerk	Research legalities of ownership and insurance.	
	176/25	Clerk	Check with Hart whether S106 allocation can be spent on revised spec for Bartley Heath path improvements.	See below
	177/25	Clerk/CllCG	Arrange vouchers for RAF personnel who will be deployed over Christmas.	Complete
	178/25	Deputy Clerk	Revise Community Award ToRs to include agreed organisations and add to website.	Complete
		Deputy Clerk/Cllr Amc	Write to all groups to secure interest.	Complete
		Deputy Clerk	Prepare media to attract nominations in New Year.	Complete
	179/25	Clerk/CllrsAM&PV	Set up payments on Unity Trust and authorise.	Complete
	180/25	Deputy Clerk	Change P&D mins 29.10.25 to final.	Complete
	181/25	Deputy Clerk	Submit comments on planning applications to Hart.	Complete
	182/25	CllrPV/Clerk	Make enquiries to clarify purpose of Deed of Variation on development on land west of Alton Road.	Complete
		Clerk	Add Deed of Variation to next agenda for signature.	Complete
	183/25	Clerk	Respond to HCC re 30mph on Alton Rd decision notice asking for clarification on comments for justification of decision.	Complete
	184/25	Clerk/CllrsAM,SB,MT	Submit grant application to the Police & Crime Commissioner's road safety grant for traffic calming	Complete
		Clerk	Suggest to RAF Odiham they submit a grant application to the above for a courtesy crossing on	Complete
	187/25	Clerk	Issue agreed Licence to OdSoc for Parish Room and arrange signatures.	Complete
	188/25	Clerk/AO	Circulate list of proposed permissions and restrictions for Chapel Cottage which will be available to	Complete
Dec-25	191/25	Clerk	Change previous minutes from draft and add to website.	Complete
	197/25	Clerk	Add co-option of councillor to RAF Station ward on next agenda.	Complete
	198/25ii	Clerk	Add revised Financial Regs on website.	Complete
	198/25iii	Clerk	Research passwords and refer Cyber Security Policy to next agenda.	N/A
	198/25iv	Clerk	Add revised H&S Policy on website.	Complete
		Office	Research and attend training on Martyn's Law and report back to Council.	
		Staffing Committee	Consider new and enhanced measures to respond to changes in H&S legislation - remote & hybrid	
	198/25v	Clerk	Add revised Safeguarding Policy on website.	Complete
	199/25	Clerk	Update Cllr Greensides's appointments on website.	Complete
	200/25	All	Report OPC's agreed priorities in next newsletter and at APA.	Complete
		Clerk	Update website.	After APA with Annual Action Plan
	201/25	All	Circulate Cllr CD's comments on LGR to all councillors and encourage councillors to respond individually.	Complete
	202/25	Clerk	Notify OCC that OPC has agreed their recommended trustee appointments.	Complete
	203/25	Deputy Clerk	Update website with 2026 APA date and book venue.	Complete
	204/25	Clerk/CllrsCG&PV	Set up payments on Unity Trust and authorise.	Complete
	205/25	Finance Committee	Refer consideration of earmarked reserves to next Finance Committee.	Complete
	206/25	Clerk/CllrCG	Transfer funds to Cllr CG to cover cost of purchasing RAF vouchers and arrange purchasing and distribution.	Complete
	207/25	Deputy Clerk	Change P&D mins 09.12.25 to final.	Complete
	208/25	Clerk	Submit to Rushmoor Council OPC's objection to Farnborough Airport expansion application to increase flights.	Complete
	209/25	Deputy Clerk	Refer 1 x pre-application advice application and 1 x tree application to next P&D Committee agenda.	Complete
	210/25	Clerk	Respond to Hart/Basingstoke legal team to confirm OPC's agreement to Deed of Variation for land west of Alton Rd.	Complete
		Clerk	Arrange signature of revised S106 Agreement for land west of Alton Rd, in accordance with Standing Orders.	Complete
	211/25	Clerk	Prepare ACV nomination for The Bridewell.	
	212/25	Traffic Calming WG	Complete review of Traffic Calming survey responses.	Complete
		Traffic Calming WG	Report back to Council with recommendations for improvements to local traffic calming.	See below
	213/25i	CllrSB/office	Progress project works to relay 70m of hardcore on pathway running through Bartley Heath.	
		Clerk	Liaise with Hart to clarify spending permission on S106 funds.	
	213/25ii	All	Forward details of outstanding path issues to Councillors, compile list of paths which councillors can	Complete
	214/25	Clerk	Update website to show agreed Finance Committee date.	Complete
	217/25	Clerk	Implement decisions on staff related matters.	Complete
Jan-26	220/25	Clerk	Change previous minutes from draft and add to website.	Complete
	226/25	Clerk	Notify Hart of Cllr Cooper's co-option, add as a new councillor on website and set up email account.	Complete
	227/25ii	Clerk	Make revision and add IT policy to website.	Complete
	227/25iii	Clerk	Finalise Standing Orders and add to website.	Complete
	228/25	Clerk/Cllr Bell	Add volunteers to OPC's risk assessment and add approved document on website.	Complete

<b>Full Council</b>				
	229/25	Clerk	Respond to Tennis Club and request further info on purpose of signage. Set up meeting to start review of lease.	Complete Complete
	230/25	Deputy Clerk	Award contract to Scandor for additional cemetery maintenance works. Complete works and report back.	Complete Complete
	231/25	Deputy Clerk	Award contract to Scandor for boundary fence and planting to Cemetery Cottage. Complete works and report back.	Complete Complete
	232/25	Clerk/CllrSB Clerk/CllrSB	Clarify purpose of expenditure for InOdiham grants and financial docs. Report back to InOdiham and request OPC to be recognised as grant funder on event promotion.	Complete Complete
	233/25	Deputy Clerk/Cllr Amc	Progress anti-enging idling campaign project and report back.	Complete
	235-36/25	Clerk	Update website with 2026-27 budget and precept.	Complete
	235-36/25	Clerk	Notify Hart of OPC's precept request.	Complete
	237/25	Clerk/CllrSLC&Amc	Set up payments on Unity Trust and authorise.	Complete
	238/25	Clerk	Complete review of website by website provider, action any matters as required and report back.	Complete
	240/25i	Traffic Calming WG	Progress next steps in traffic calming work - seek advice from HCC strategic infrastructure, parking & Police and report to WG.	On agenda
	240/25ii	Deputy Clerk	Complete first training course/event for new Speedwatch volunteers.	Complete
	240/25iii	Deputy Clerk	Obtain quote from traffic management company for alternative speed reminder and refer to WG for consideration.	No response - suggest removing from action list
	243/25	Amenities Officer	Inspect Chapel Property and report back on any works required. Switch off water (if poss).	Complete. Water kept on to keep boiler running.
		Clerk	Notify insurer that the property is unoccupied.	Complete. Only valid for 6 months under curren insurance.
		Amenities Officer	Obtain 3 market valuations and report back.	Complete
Feb-26	245/25b	Clerk	Change previous minutes from draft and add to website.	Complete
	249/25iv	Clerk	Arrange meeting with Vivid Homes and invite Cllr Dorn.	Complete
	252/25	Clerk	Add meeting calendar to June Council agenda with review of committees.	
	253/25	Clerk	Update website to show Cllr Cooper's committee appointments.	Complete
	255/25	Clerk	Report back to Tennis Club OPC's decision on signage and arrange date to sign lease with extended term.	Emailed 18.02.26
	256/25	Office	Award contract to DTE Ltd to upgrade lights. Complete works.	Complete Scheduled 24.03.26
	257/25	Deputy Clerk	Update website to show revised cemetery fees.	Complete
	258/25	Deputy Clerk	Update website to show revised allotment fees.	Complete
		Amenities Officer	Notify tenants.	Complete
	259/25	Amenities Officer/Office	Research alternative and lower cost options to upgrade Chamberlain Gardens play area equipment.	In progress
	261/25	Clerk	Report back to InOdiham re 2026/27 grants.	Complete
	262/25	CllrsAMc/Deputy Clerk/Clerk	Complete anti-engine idling campaign - meet Buryfields, install signage and include article in Spring newsletter.	Complete
	263/25	Office	Award contract for defib, install and promote online and in Spring newsletter.	Complete
	264/25	Clerk	Add 2025/26 Asset Register to website.	Complete
	265/25	Clerk/CllrSLC&Amc	Set up payments on Unity Trust and authorise.	Complete
	266/25	Deputy Clerk	Change draft responses to planning applications 24.02.26 to final.	Complete
	267/25	CllrPV	Meet with SN to draw up a response to the Gov's consultation on the national planning policy, submit response and refer to March mtg.	Complete
	268/25	Clerk	Submit OPC's 2 x responses to planning and licencing applications.	Complete
	269/25	Traffic Calming WG	Progress traffic calming enquiries with HCC, including in Spring newsletter, report at APA and update WG asap after HCC mtg.	On agenda
	272/25	Amenities Officer	Make arrangements for Chapel Cottage to be marketed with agent MacKenzie Smith.	In progress
Mar-26	276/25	Clerk	Change previous minutes from draft and add to website.	Complete
	277/25i	Deputy Clerk/Chair	Send letter of thanks to SSE re recent cabling works in King St and The Bury area.	Complete
	277/25ii	Clerk	Submit OPC's support for reducing speed limit to 40mph at the Golden Pot junction in responses to the TRO consultation.	Complete
	278/25	Clerk	Liaise with U3A re National Emergency Briefing.	Complete - decided to invite councillors to U3A events.
	282/25i	Deputy Clerk	Add revised Topple Testing Policy to website.	Complete
	282/25ii	Deputy Clerk	Award contract to Scandor for cemetery memorial topple testing. Complete works.	Awaiting 26/27 precept Awaiting 26/27 precept
	283/25i	Clerk	Add revised plans for The Bridewell on website.	Complete
		CllrsAMc/LC	Present revised plans for The Bridewell to the APA.	
	283/25ii	Clerk	Award contract to FlowerKittle Architects to support OPC in securing listed building consent for revised Bridewell plans. Complete project and report back to Council.	Complete
	285/25	Office	Add OPC's agreed events to website and progress plans to hold events.	Complete
	286/25	Clerk	Add annual review of contracts and subscriptions to website.	Complete
		Amenities Officer	Arrange for SSE contract for cemetery electricity to be cancelled.	
	287/25	Clerk/CllrsAM&PV	Accept insurance quote from Clear Councils, make payment and communicate insurance cover to employees.	Complete
	288/25	Clerk/CllrsAM&PV	Set up payments on Unity Trust and authorise.	Complete
	289/25i	Deputy Clerk	Change draft responses to planning applications 24.02.26 to final.	Complete
	289/25ii	Deputy Clerk	Submit OPC's objection to 25/02559/PREAPP for up to 100 retirement homes on land at Broad Oak.	Complete
	291/25	Deputy Clerk	Submit OPC's responses to planning and licencing applications.	Complete

REVIEW OF OPC POLICIES - 21.04.26

Policy Name	Latest review	Essential/ Desirable/ Optional	Recommended next review
<b>Governance</b>			
Code of Conduct	Sep-23	Essential	Sep-26 - review at least every 3 years or following change in legislation or guidance.
Publication Scheme	Sep-23	Essential	Sep-26 - unless change in ICO model scheme.
Standing Orders	Jan-26	Essential	Jan-27 - annual review required.
Scheme of Delegation	Jan-25	Desirable	Jan-27 - unless change in circumstances.
Business Continuity Plan	Feb-25	Desirable	Feb-27 - unless change in circumstances.
Equality, Diversity and Inclusion Policy	Dec-24	Advisable	Dec-26.
Dignity at Work Policy	Dec-24	Advisable	Dec-26.
Councillor Officer Protocol	Dec-24	Advisable	Dec-26.
<b>Finance</b>			
Financial Regulations	Dec-25	Essential	Dec-26.
Statement of Internal Controls	Nov-25	Desirable	Nov-27.
Claiming expenses by Cllrs Policy	Nov-24	Optional	Jul-27 - new Council.
Report on the Independent Remuneration Panel for Hart Parish Councils			-
Investment Policy	Nov-25	Essential	Nov-27.
Reserves Policy	Nov-25	Optional	Nov-27.
Grant Giving Policy	May-25	Essential	May-26.
<b>Council Strategy</b>			
Strategic Plan/Business Plan	Apr-26	Desirable	Mar-26 - annual review required. Reviewed with Annual Action Plan and Annual Report. <b>On agenda.</b>
Annual Action Plan	Apr-26	Desirable	Mar-26 - annual review required. Reviewed with Business Plan and Annual Report. <b>On agenda.</b>
Casual Vacancy and Co-option Policy	Sep-24	Optional	May-27.
Complaints Procedure	Mar-25	Essential	Mar '27
<b>Data Protection</b>			
Data Protection Policy	Jul-23	Essential	<del>May-2027 – unless change in legislation.</del> –On agenda - audit requirement to review annually.
Document Retention Policy	Aug'24	Desirable	<del>May-2027 – unless change in legislation.</del> –On agenda - advisable to review with DP policy.
Consent form for communication with OPC	Jul-23	Desirable	<del>May-2027 – unless change in legislation.</del> –On agenda - advisable to review with DP policy.
Privacy Notice - General	Jul-23	Essential	<del>May-2027 – unless change in legislation.</del> –On agenda - advisable to review with DP policy.
Privacy Notice - Staff, Cllrs and Role Holders	Jul-23	Essential	<del>May-2027 – unless change in legislation.</del> –On agenda - advisable to review with DP policy.
Subject Access Request Policy	Jul-23	Desirable	<del>May-2027 – unless change in legislation.</del> –On agenda - advisable to review with DP policy.
<b>Health &amp; Safety</b>			
Health & Safety Policy	Dec-25	Essential	Dec-26.
Safeguarding Policy	Dec-25	Desirable	Dec-27.
<b>Environment</b>			
Environment & Climate Change Policy	Sep-24	Desirable	Sep-26.
Biodiversity Action Plan	Aug-22	Essential	Reviewed Sept 23. Essential under the Natural Environment and Rural Communities Act 2006.
<b>Managing assets</b>			
Memorial Bench Policy	Apr-25	Optional	Apr-27.
Hiring OPC's land and equipment	Sep-24	Optional	Sep-26.
Tree Policy	Jul-25	Optional	Jul-27
<b>Communication</b>			
Communication Strategy	Aug-25	Desirable	Aug-27.
IT Policy	Jan'26	Desirable	Jan-28.
<b>Staffing</b>			
Disciplinary and Grievance Arrangements	Nov-25	Desirable	Nov-27.
Training and Development Policy	Nov-25	Desirable	Nov-27.
Staff Handbook	Nov-25	Optional	Nov-27.
Sickness absence policy	Nov-25	Desirable	Nov-27.
Flexible working policy	Nov-25	Desirable	Nov-27.
Emergency dependants leave policy	Nov-25	Desirable	Nov-27.
Lone working policy	Nov-25	Desirable	Nov-27.
Pensions Discretionary Policy	Nov-25	Essential	Nov-27.



# Odiham Parish Council

## Data Protection (General Data Protection Regulations [GDPR]) Policy

### Introduction

Odiham Parish Council needs to hold certain information about individuals for a variety of business purposes.

This policy states how personal data will be collected, handled and stored to meet data protection standards and to ensure employees understand the rules governing the use of personal data to which they have access in the course of their duties.

This policy ensures Odiham Parish Council:

- Complies with the Data Protection Act 2018 and UK General Data Protection Regulations (GDPR) and follows good practice.
- Protects the rights of the employees and all other stakeholders.
- Is open about how it stores and processes an individual's data.
- Protects itself from the risk of data breach.
- Is committed to conducting its business in accordance with all applicable data protection laws and regulations and is in line with the highest standards of ethical conduct.

### Applicability

This policy applies to the processing of personal data for customers, employees (current or former), suppliers, business contacts, candidates for jobs and other stakeholders in manual and electronic records kept by Odiham Parish Council in connection with its business. It also covers Odiham Parish Council's response to any data breach and other rights under UK GDPR.

This policy applies to all company employees who process personal data while carrying out their business activities.

### Key terms

'*Personal data*' is information that relates to an identifiable person who can be directly or indirectly identified from that information, for example, a person's name, identification number, location, or online identifier. It can also include pseudonymised data. Odiham Parish Council uses the personal data of its contacts for the following purposes: the general running and business administration and to provide services to its customers.

'*Sensitive personal data*' is data that relates to an individual's health, sex life, sexual orientation, race, ethnic origin, political opinion, religion or trade union membership. It also includes genetic and biometric data used for ID purposes.

'*Criminal offence data*' is data that relates to an individual's criminal history.

'*Data processing*' is any operation or set of operations that are performed on personal data or on sets of personal data. This may be by automated means such as collection, recording, organisation structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

'*Data subject*' is the individual to whom the personal data relates.

The Parish Clerk is Odiham Parish Council's Data Protection Officer. The '*Data Protection Officer*' (DPO) informs and advises on obligations to comply with UK GDPR and other data protection legislation and monitors compliance. This includes managing internal data protection activities, advises on data protection impact assessments, trains staff and conducts internal audits. They are the first point of contact for supervisory authorities such as the Information Commissioner's Office, individuals whose data is processed, business development purposes, personnel, administrative, financial, regulatory and payroll.

Odiham Parish Council makes a commitment to ensuring that personal data, including sensitive personal data and that relating to criminal offence data, is processed in line with UK GDPR and domestic law. All its employees conduct themselves in line with this and other related policies. Where Odiham Parish Council uses third parties to process data on its behalf, Odiham Parish Council will ensure that the third party takes such measures to maintain Odiham Parish Council's commitment to protecting data. Odiham Parish Council understands that it will be accountable for the processing, management, regulation, storage and retention of personal data held electronically and in the form of manual records.

### **Types of data held**

Data is likely to comprise:

- Name, address, email address, telephone number and other contact information.
- Next of kin details.
- Bank details and National Insurance number.
- Right to work in the UK documentation and other security screening information.
- Driving licence or Passport.
- Medical information.
- Absence, disciplinary and grievance records.
- Qualifications, skills, experience and employment history.
- Current level of remuneration, including benefit entitlement.
- Disability.
- Contracts with clients and suppliers.
- Email traffic.
- Web browsing activity
- CCTV recording on company property
- Mailing lists

Individuals should refer to Odiham Parish Council's privacy notices for more information on the reasons for its processing activities and the lawful basis it relies on for the processing and data retention periods.

### **Data protection principles**

When dealing with personal data Odiham Parish Council shall ensure that the following seven principles are adhered to:

1. Fair Lawful and Transparent Processing  
All personal data will be processed lawfully, fairly and in a transparent manner in relation to the data subject.
2. Purpose limitation  
It will be clearly specified exactly what the personal data to be collected will be used for and limit the processing of the data to only that which is necessary to meet the explicit, legitimate and specified purpose.

3. Data minimisation

Personal data will be adequate, relevant and limited to that which is necessary in relation to the purposes for which it is processed, personal data beyond that which is strictly required will not be stored.

4. Accuracy and relevance

Any personal data processed will be accurate and relevant, not excessive and kept up to date. Inaccurate data will be erased or rectified without delay.

The measures adopted by Odiham Parish Council to ensure data quality include:

- Correcting personal data known to be incorrect, inaccurate, incomplete, ambiguous, misleading or outdated, even if the data subject does not request it.
- Keeping personal data only for the period necessary to satisfy the permitted uses or applicable retention period.
- The removal of personal data if in violation of any of the data protection principles or if the personal data is no longer required.
- Restriction rather than deletion of personal data in so far as the law prohibits erasure.
- Erasure would impair the legitimate interests of the data subject.

5. Storage limitation, data retention and storing data securely

Wherever possible, personal data will be stored in a way that limits or prevents identification of the data subject. All personal data will be deleted or destroyed as soon as possible where it has been confirmed there is no longer a need to retain it.

- Where data is stored on printed paper it will be kept in a secure place where unauthorised persons cannot access it.
- Printed data will be shredded and placed in confidential waste bags when it is no longer required.
- Data stored electronically will be protected by strong passwords that are changed regularly. All staff will be encouraged to use a password manager to create and store passwords.
- [The DPO must approve any 'cloud' used to store data].
- Servers containing personal data will be kept at a secure location away from general office space.
- All servers containing sensitive data will be protected by security software and strong firewalls.
- Data will be regularly backed up in line with the backup procedures
- Data will never be saved directly to mobile devices such as laptops, tablets or smartphones.

6. Integrity, confidentiality and data security.

Personal data will be processed in a manner that ensures appropriate security of the data including protection against unauthorised or unlawful processing, against accidental loss, destruction or damage using appropriate technical or organisational measures.

7. Accountability

The Data Controller shall be responsible for and be able to demonstrate compliance with UK GDPR and review and update relevant policies and procedures.

## **Individual's rights.**

Personal data will be processed in recognition of an individual's data protection rights as follows:

- The right to be informed.
- The right of access.
- The right for any inaccuracies to be corrected.
- The right to have information deleted.
- The right to restrict the processing of the data.
- The right of portability.
- The right to object to the inclusion of any information.
- The right to regulate any automated decision-making and profiling of personal data.

## **Employees personal data.**

Employees must take responsible steps to ensure that the personal data held about them is accurate and updated as required. This would include changing a name or address.

## **Children's personal data.**

Children's data is rarely processed by Odiham Parish Council. The Council will occasionally process children's names and photographs, eg when running competitions or community awards, strictly only with permission from their school or parents/guardians.

## **Privacy notices**

Privacy notices are issued to all individuals whose personal data is possessed by Odiham Parish Council.

These notices set out the purpose for which it holds the data, what data is collected, who it is shared with, how it is stored, how long it is retained and the individual's data protection rights.

Odiham Parish Council's website includes an outline privacy notice and an online cookie notice fulfilling the requirements of applicable law.

## **Access to data**

Individuals are entitled to request access to information held about them. Odiham Parish Council will consider each request in accordance with all applicable data protection laws and regulations.

- Subject access requests should be made in writing and submitted to the Parish Clerk and sent either by post to Odiham Parish Council, The Bridewell, The Bury, Odiham, Hampshire, RG29 1NB, or by email to [clerk@odihamparishcouncil.gov.uk](mailto:clerk@odihamparishcouncil.gov.uk).
- Ensure that in the case where processing is conducted by a data processor, the data can be processed only in accordance with the instructions of the data controller.
- Ensure that personal data is protected against undesired destruction or loss.
- Ensure that personal data collected for different purposes can and is processed separately.
- Ensure that personal data is not kept longer than necessary.

In addition, employees must:

- Ensure that all files or written information of a confidential nature are stored in a secure manner and are only accessed by people who have a need and a right to access them.

- Ensure that all files or written information of a confidential nature are not left where unauthorised people can read them.
- Check regularly on the accuracy of data being entered into computers.
- Always use secure passwords to access the computer systems and not abuse them by passing on to unauthorised persons.
- Lock the computer when not in use so that personal data is not left on screen when unattended.
- No personal email accounts should be used for council business.

Personal data relating to employees should not be kept or transported on laptops, USB sticks or similar devices unless authorised. Where any personal data is recorded on any device, it should be safeguarded in the following way:

- Ensuring that data is recorded only on the device if strictly necessary.
- Using an encrypted system – a folder should be created to store the files that need extra protection, and all files created or moved to this folder should be automatically encrypted.
- Ensuring that laptops or USB drives are kept securely to minimise theft.

### **Reporting a suspected data breach.**

A personal data breach is a breach of security leading to the accidental or unlawful destruction, loss, alteration or unauthorised disclosure of personal data.

All staff have an obligation to report actual or potential data protection compliance failures to the Parish Clerk. Where a data breach is likely to result in a risk to the rights and freedoms of individuals, it will be reported to the Information Commissioner within 72 hours of Odiham Parish Council becoming aware of the breach. It may be reported in more than one instalment.

Individuals will be informed directly if a breach is likely to result in a high-risk to the rights and freedoms of that individual.

If the breach is significant enough to warrant notification to the public, Odiham Parish Council will do so without undue delay.

### **Procedures**

Odiham Parish Council has taken the following steps to protect the personal data it holds or to which it has access to and appoints employees with specific responsibilities for:

- The processing and controlling of data.
- The comprehensive reviewing and auditing of its data protection systems and procedures.
- Overseeing the effectiveness and integrity of all the data that must be protected.

There are clear lines of responsibility and accountability for these distinct roles.

Furthermore Odiham Parish Council will:

- Provide information to its employees on their data protection rights, how it uses their personal data and how it protects it. The information includes the actions individuals can take if they think that their data has been compromised in any way.
- Provides its employees with information and training to make them aware of the importance of protecting personal data teaching them how to do this and understand how to treat information confidentiality.

- Account for all personal data it holds, where it comes from and with whom it is shared or likely to be shared.
- Conduct risk assessments as part of its reviewing activities to identify any vulnerabilities in the handling and processing of personal data, taking measures to reduce mishandling and potential breaches of data security. The procedure includes an assessment of the impact of both.
- Recognise the importance of seeking individual's consent for obtaining, recording, using, sharing, storing and retaining their personal data, regularly reviewing procedures. Audit trails are needed and are followed for all consent decisions that must be freely given by an individual and should be specific, informed and unambiguous. Full information will be given regarding the activities about which consent is sought. Individuals have the absolute right to withdraw that consent at any time.
- Have appropriate mechanisms for detecting, reporting and investigating suspected or actual personal data breaches including security breaches. It is aware of the duty to report high-risk breaches that may cause significant harm to the affected individual to the Information Commissioner and is aware of the possible consequences.

## **Training**

New employees must read and understand the policies on data protection as part of their induction.

All employees receive training covering basic information about confidentiality, data protection and the actions to take on discovering a potential data breach.

The nominated data controller/auditors/protection officers for Odiham Parish Council are trained appropriately in their roles under UK GDPR.

All employees who need to use the IT system are trained to protect the individuals' personal data, ensuring data security and to understand the potential consequences to themselves and Odiham Parish Council of lapses and breaches of policy and procedure in accordance with Odiham Parish Council's IT policy.

## **Records**

Odiham Parish Council keeps records of its processing activities including the purpose for processing and retention periods. These records will be kept up to date so that they reflect current processing activities.

## **Data Protection Officer (DPO)**

Odiham Parish Council's DPO can be contacted via email, [clerk@odihamparishcouncil.gov.uk](mailto:clerk@odihamparishcouncil.gov.uk).



# Odiham Parish Council

## Data Retention Policy

### Introduction

Odiham Parish Council recognises that the efficient management of its records is necessary to comply with its legal and regulatory obligations and to contribute to the effective overall management of the Council.

This policy applies to all records created, received, or maintained by Odiham Parish Council while carrying out its functions. Records are defined as all those documents which facilitate the business carried out by the Council and which thereafter retained (for a set period) to provide evidence of its transactions or activities. These records may be created, received, or maintained in hard copy and/or electronically.

A small percentage of Odiham Parish Council records will be selected for permanent preservation as part of the Council's archives and for historical research.

### Responsibilities

Odiham Parish Council has a corporate responsibility to maintain its records and record management systems in accordance with the regulatory environment. The person with overall responsibility for the implementation of this policy is the Parish Clerk, and the Clerk is required to manage the Council's records in such a way as to promote compliance.

### Retention Schedule

Under the [Freedom of Information Act 2000](#), the Council is required to maintain a retention schedule outlining how long they hold different types of records and what actions are taken when they are no longer needed. The retention schedule lays down the length of time which the record or document needs to be retained and the action which should be taken when it is of no further administrative use ensuring full compliance with the [Data Protection Act 2018](#), which came into force on 25 May 2018 which gives effect to UK law to the [UK General Data Protection Regulations \(UK GDPR\)](#).

The Parish Clerk is expected to manage the current record keeping systems using the retention schedule and to take account of the different retention periods when creating new record keeping systems. The retention schedule refers to record series regardless of the media in which they are stored.

### Data Audits

The Parish Clerk will ensure regular data audits, at least once a year.



## APPENDIX A – LIST OF DOCUMENTS FOR RETENTION AND DISPOSAL

Document	Minimum Retention Period	Reason
<b>Administration</b>		
Accident/incident reports	20 years	Potential claims
Agendas – paper	5 years	Management
Agenda papers	20 years	
Applications to hire land, buildings and equipment	6 years	Insurance and VAT
Complaints	Can delete nine months after latest correspondence	Administration
Consultation responses	???	
E-newsletter sign-up's	Until the subscriber unsubscribes	Administration
Event invite lists	Retain latest events only	Administration
Freedom of Information and subject access requests	Can delete three years after latest correspondence relating to request	FOI legislation
General enquiries to Parish Office	Until there is no operational purpose	Administration
Insurance policies	While valid	Management and potential claims
Insurance company names and policy numbers	Indefinite	Management
Minutes	Indefinite	LGA legislation
Play equipment inspection reports	21 years	Potential claims
Title deeds, leases, agreements, contracts	Indefinite	Management
Volunteers personal details	????	Insurance
<b>Allotments</b>		
Register, contract and plans	Indefinite	Management
Rental agreements	Whilst valid	Financial
<b>Burial Grounds</b>		
<ul style="list-style-type: none"> <li>• Register of fees collected</li> <li>• Register of burials</li> <li>• Register of purchased graves</li> <li>• Register/plan of grave spaces</li> <li>• Register of memorials</li> <li>• Applications for interment</li> <li>• Applications for right to erect memorials</li> <li>• Disposal certificates</li> <li>• Copy of certificates of grant of exclusive right of burial</li> </ul>	Indefinite	Local Authorities Cemeteries Order 1977 (SI. 204)
<b>Financial</b>		
Annual returns	Indefinite	Audit
Bank statements including deposit/savings accounts	Last completed audit year	Audit
Bank paying-in books	Last completed audit year	Audit
Cheque book stubs	Last completed audit year	Audit
Grant applications received	3 years	Audit
Investments	Indefinite	Audit Management
Paid invoices	6 years	VAT

<b>Document</b>	<b>Minimum Retention Period</b>	<b>Reason</b>
Paid cheques	6 years	Limitation Act 1980 (as amended)
Quotations and tenders	6 years	Limitation Act 1980 (as amended)
Receipt and payment accounts	Indefinite	Management
Receipt books of all kinds	6 years	VAT
Scales of fees and charges	6 years	Management
VAT records	6 years generally but 20 years for VAT on rents	VAT management
Petty cash	6 years	Tax, VAT, Limitation Act 1980 (as amended)
<b>Local information</b>		
Council owned publications, photographs and press cuttings	Indefinite	Historical archive
Information from other bodies e.g. circulars from county associations, NALC, principal authorities	Until there is no longer an administrative requirement.	Operational
Local/historical information	Indefinite	Historical archive
Neighbourhood Plans	Until there is no longer an administrative requirement	Operational
Village Plans	Until there is no longer an administrative requirement	Operational
<b>Members</b>		
Bank signatories applications	Until the application request has been implemented	Operational
Contact details	Until there is no longer an administrative purpose	Operational
Acceptance of office – general	Until the councillor ceases to be a councillor	Operational
Acceptance of office – chair	Indefinite	LGA legislation
Members' allowances register	6 years	Tax, Limitation Act 1980 (as amended)
Members' DPI forms	Until the councillor ceases to be a councillor	Operational
<b>Personnel</b>		
Certificates for insurance against liability for employees	40 years from date on which insurance commenced or was renewed	The Employers' Liability (Compulsory Insurance) Regulations 1998 (SI 2753) Management
Contracts and staff records	???	Operational/legal
NI/PAYE	6 years	Financial
Pension information	Until pension has been claimed	Financial
Timesheets/diaries	Last completed audit year 3 years	Operational
Wages books/payroll	12 years	Superannuation



# GENERAL PRIVACY NOTICE

Reviewed and adopted ~~18<sup>th</sup> July 2023~~

## **Your Personal Data – what is it?**

Personal data is any information about a living individual which allows them to be identified from that data alone or by combining it with other information.

The processing of personal data is governed by legislation relating to personal data which includes the General Data Protection Regulation – effective from 25 May 2018.

## **Data Controller**

This Privacy Notice is provided to you by Odiham Parish Council which is the data controller for your data. This means it decides how your data is processed and for what purpose.

This Parish Council takes the protection of your data seriously. Our aim is to provide a personal and valuable service whilst safeguarding your privacy. Collecting some personal information is necessary to satisfy the expectations and requirements of our residents and customers and we have set out in this notice what we will do with your personal information.

## **Principles of GDPR**

Odiham Parish Council complies with the 6 principles of GDPR when handling personal data as follows:

- It is processed lawfully, fairly and transparently.
- It is only used for the specific purpose of which you are aware and not further processed without your permission
- It is relevant and limited to what is necessary for the specified purpose.
- It is accurate and, where necessary, kept up to date.
- It is only kept for as long as is necessary for that purpose and that storage is safe and secure.
- It is kept and subsequently destroyed securely; and measures are in place to protect it from loss, misuse, unauthorised access and disclosure.

## **Personal Data we process**

The Council will process some or all of the following where necessary to perform its task:

- Names, titles and aliases, photographs and images;
- Contact details such as telephone numbers, addresses and email addresses;
- Where you pay for activities such as use of council facilities, financial identifiers such as bank account numbers, payment identifiers, policy and claim numbers.

The Council does not collect 'sensitive personal data' as defined under GDPR which includes data relating to racial or ethnic origin, political opinions, religious beliefs, criminal convictions, physical and mental health and sexual orientation. It may, however, process this data in relation to employment which is subject to a separate privacy notice.

## **How we use your personal data**

The Parish Council processes your data for some of the following purposes:

- To deliver public services and maintain our facilities;
- To confirm your identity to provide some services;
- To contact you by post, email, telephone or social media;
- To maintain our own records and accounts;
- To ensure the proper use of public funds;
- To enable us to meet all our legal and statutory obligations and powers including any delegated functions;
- To manage our employees and volunteers;
- To inform you of news, events and activities within the parish.

## **The Legal Basis for processing your personal data**

The council processes personal data under 3 legal bases:

- As a public authority the council has certain powers and obligations. Most of your personal data is processed for compliance with legal obligations which includes carrying out the council's statutory functions and powers.
- Contractual relationship: we may process personal data if it is necessary for the performance of a contract with you e.g. Hiring our facilities or an allotment tenancy agreement.

- Consent: sometimes the use of your personal data requires your express consent and we will not use it until that consent has been granted.

### **Sharing your personal data**

Your personal data will be treated as strictly confidential. We will only share your data with third parties with your consent unless it is for the purposes of criminal investigation or proceedings or for the distribution of our newsletter.

It should be noted that we receive some personal data from other data controllers, e.g. the electoral roll and planning applications. We will process that data in accordance with our policy.

### **How long do we keep your personal data?**

We will only retain personal data for as long as is deemed necessary. We are legally obliged to keep some records permanently and financial records for 7 years for tax purposes.

Details of our data retention periods can be found in our Document Retention Policy and our Data Protection Policy.

When personal data is no longer needed it will be destroyed or deleted in a secure manner.

### **Your rights and your personal data**

Under GDPR you have the following rights with respect to your personal data:

Please note: when exercising any of the rights listed below, we may require you to verify your identity for security purposes. In such cases we will need you to prove your identity before you can exercise these rights.

1. The right to access personal data we hold on you
  - At any point you can contact us to request a copy of the personal data Odiham Parish Council holds on you.
  - There are no fees or charges for the request although unfounded or excessive requests may be subject to an administrative fee.
2. The right to correct and update the personal data we hold on you
  - If the data we hold on you is out of date, incomplete or incorrect, you can inform us and your data will be updated.
3. The right to have your personal data erased
  - If you feel that we should no longer be using your personal data or that we are unlawfully using it, you can request that we erase the personal data we hold.
  - When we receive your request, we will confirm whether the personal data has been deleted or give a reason why it cannot be destroyed.
4. The right to object to processing of your personal data or to restrict its use
  - You have the right to request that we stop processing your personal data or ask us to restrict processing.
  - Upon receipt of your request we will confirm whether we are able to comply or if we have a legal obligation to continue to process your data.
5. The right to data portability
  - You have the right to request that we transfer some of your data to another controller.
  - We will comply with your request within one month, where it is feasible to do so.
6. The right to withdraw your consent at any time to the processing of your data
  - You can withdraw the consent you previously gave us by contacting the office by telephone, email or by post (contact details below).
7. The right to lodge a complaint with the Information Commissioner's Office
  - You can contact the Information Commissioner's Office on 0303 123 1113 or via its website email service <https://ico.org.uk/global/contact-us/email/> or by post to information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF.

### **Transfer of Data Abroad**

All personal data will be placed on systems within the UK or European Economic Area.

However, it should be noted that our website is accessible from overseas so on some occasions personal data may be accessed abroad.

**Further Processing**

If we wish to use your personal data for a new purpose, not covered by this Privacy Notice, then we will provide you with a separate notice explaining this new use prior to commencing the processing. Where and whenever necessary, we will seek your prior consent to the new processing.

**Contact Details**

To exercise all relevant rights or if you have any questions about this Privacy Notice, please contact The Parish Clerk at:

Odiham Parish Council  
The Bridewell  
The Bury  
Odiham  
RG29 1NB  
Email: [clerk@odihamparishcouncil.gov.uk](mailto:clerk@odihamparishcouncil.gov.uk)

**Changes to this notice**

We keep this Privacy Notice under regular review and will place any updates on our web page. This policy was last updated in ~~July 2023~~.



**PRIVACY NOTICE**  
**For staff\*, councillors and role holders\*\***

**Reviewed and adopted on ~~18<sup>th</sup> July 2023~~**

\* Staff: employees and agency staff - all retained on permanent or temporary contracts

\*\* Role holders: includes volunteers, contractors, former staff and former Cllrs. Also includes applicants or candidates for these roles.

### **Your Personal Data – what is it?**

“Personal data” is any information about a living individual which allows them to be identified from that data alone or by combining it with other information (eg name, photograph, video, email address).

The processing of personal data is governed by legislation relating to personal data which includes the General Data Protection Regulation – effective from 25 May 2018.

### **Who are we?**

This Privacy Notice is provided to you by Odiham Parish Council which is the data controller for your data. This means that OPC decides how your data is processed and for what purpose. This Parish Council takes the protection of your data seriously.

### **Principles of GDPR**

Odiham Parish Council will comply with data protection law and as such when handling personal data, we will ensure that:

- It is processed lawfully, fairly and in a transparent way.
- It is only used for the specific purpose of which you are aware and not further processed without your permission
- It is relevant and limited to what is necessary for the specified purpose.
- It is accurate and, where necessary, kept up to date.
- It is only kept for as long as is necessary for that purpose.
- It is kept and subsequently destroyed securely; and measures are in place to protect it from loss, misuse, unauthorised access and disclosure.

### **Personal Data we process**

- Names, titles and aliases, photographs and images;
- Start/leaving dates;
- Contact details such as telephone numbers, addresses and email addresses;
- Where relevant to our legal obligations, data on gender, age, date of birth, marital status, nationality, education/work history, academic/professional qualifications, dependants;
- Non-financial identifiers such as passport numbers, driving licence numbers, taxpayer identification numbers, tax reference codes & NI numbers;
- Financial identifiers such as bank account numbers, payment card numbers;
- Financial information such as National Insurance number, pay and pay records, tax code, tax and benefits contributions and expense claims;
- Other operational personal data created, obtained or otherwise processed in course of normal activities, including IP addresses and website visit histories, logs of visitors, accident records and insurance claims;
- Next of kin and emergency contact information;
- Recruitment information;
- Other staff data including performance management information, information for disciplinary or grievance proceedings, employment status.

### **How we use your personal data?**

The Parish Council processes your data for some or all of the following purposes:

- Making decisions about your appointment;
- Determining the terms of which you work for us;
- Checking your legality to work in the UK;
- Paying you and if you are an employee, deducting tax, NI and pension contributions;
- Providing any contractual benefits to you;
- Administering the contract that we have entered into with you;
- Managing and planning, including accounting and auditing;
- Conducting performance reviews and managing performance;
- Making decisions about salary reviews and compensation;
- Assessing qualifications for a particular job or task;
- Conducting grievance or disciplinary proceedings;

- Making decisions about your continued employment;
- Making arrangements for the termination of our working relationship;
- Education, training and development requirements;
- Dealing with legal disputes, involving you, including accidents at work;
- Ascertaining your fitness to work;
- Managing sickness absence;
- Complying with health and safety obligations;
- To prevent fraud;
- To ensure network and information security;
- To undertake activity consistent with our statutory functions and powers including any delegated functions;
- To maintain our own records and accounts;
- To seek your views or comments;
- To administer Cllr's interests;
- To process a job application;
- To provide a reference;

Some of the above grounds will overlap and there may be several grounds which justify our use of your personal data.

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform a contract that we have entered into with you;
- Where we need to comply with a legal obligation.

#### **How we process sensitive personal data**

- We may process sensitive personal data relating to staff, Cllrs or role holders including as appropriate:
  - Information about your physical or mental health or condition in order to monitor sick leave or take decisions about fitness to work;
  - Your racial or ethnic origin or religious or similar information in order to monitor compliance with equal opportunities legislation;
  - In order to comply with legal requirements and obligations to third parties;
- These types of data are described in the GDPR as 'Special categories of data' and require higher levels of protection. We need to have further justification for collecting, storing and using this type of data;
- We may process special categories of personal data in the following circumstances:
  - With your explicit written consent;
  - Where we need to fulfil our legal obligations;
  - Where it is needed in the public interest, such as equal opportunities monitoring;
  - Where it is needed to assess your working capacity on health grounds, subject to appropriate confidentiality safeguards.
- Less commonly, we may process this type of data where it is needed in relation to legal claims or to protect your interests (or someone else's) and you are not capable of giving your consent, or where you have already made the information public.

Please note: it is not a condition of your contract with us that you agree to any request for consent from us to process your personal data.

#### **Information about criminal convictions**

- We may only use personal data relating to criminal convictions where the law allows.
- We may use personal data relating to criminal convictions where it is necessary in relation to legal claims, to protect your interests or someone else's and you are not capable of giving your consent or have already made the information public.
- We will only collect personal data about criminal convictions if it is appropriate given the nature of the role and where we are legally able to do so. Typically, and where appropriate we will collect this personal data as part of the recruitment process.

#### **The Legal Basis for processing your personal data**

- Some of our processing is necessary for compliance with a legal obligation.

- We may also process personal data if it is necessary for the performance of a contract with you, or to take steps to enter into a contract.
- We will also process your data in order to assist you in fulfilling your role in the council including administrative support or for compliance with a legal obligation.

### **Sharing your personal data**

Your personal data will be treated as strictly confidential. We will only share your data with third parties where it is necessary for the performance of the data controllers' task or where you first give us consent. It is likely that we will share your data with the following data controllers:

- Our agents, suppliers and contractors. Eg, for outsourced HR functions or managing our IT systems and software;
- Other local authorities – mainly Hart District Council and Hampshire County Council;
- HMRC;
- Staff pension providers – Hampshire Pension Fund;
- Former and prospective employers;
- DBS service suppliers;
- Recruitment agencies;
- Professional advisers;
- Trade unions or employee representatives;

### **How long do we keep your personal data?**

We will only retain personal data for as long as is deemed necessary. We are legally obliged to keep some records permanently and financial records for 7 years for tax purposes.

Details of our data retention periods can be found in our Document Retention Policy and our Data Protection Policy.

When personal data is no longer needed it will be destroyed or deleted in a secure manner.

### **Your responsibilities**

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your working relationship with us.

### **Your rights and your personal data**

Under GDPR you have the following rights with respect to your personal data:

Please note: when exercising any of the rights listed below, we may require you to verify your identity for security purposes. In such cases we will need you to prove your identity before you can exercise these rights.

- 1. The right to access personal data we hold on you**
  - At any point you can contact us to request a copy of the personal data Odiham Parish Council holds on you. Once we have received your request we will respond within one month.
  - There are no fees or charges for the request although unfounded or excessive requests may be subject to an administrative fee.
- 2. The right to correct and update the personal data we hold on you**
  - If the data we hold on you is out of date, incomplete or incorrect, you can inform us and your data will be updated.
- 3. The right to have your personal data erased**
  - If you feel that we should no longer be using your personal data or that we are unlawfully using it, you can request that we erase the personal data we hold.
  - When we receive your request, we will confirm whether the personal data has been deleted or give a reason why it cannot be destroyed.
- 4. The right to object to processing of your personal data or to restrict it use**
  - You have the right to request that we stop processing your personal data or ask us to restrict processing.
  - Upon receipt of your request we will confirm whether we are able to comply or if we have a legal obligation to continue to process your data.
- 5. The right to data portability**
  - You have the right to request that we transfer some of your data to another controller.
  - We will comply with your request within one month, where it is feasible to do so.
- 6. The right to withdraw your consent at any time to the processing of your data**

- You can withdraw the consent you previously gave us by contacting the office by telephone, email or by post (contact details below).
- 7. The right to lodge a complaint with the Information Commissioner's Office**
- You can contact the Information Commissioner's Office on 0303 123 1113 or via its website email service <https://ico.org.uk/global/contact-us/email/> or by post to Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF.

### **Transfer of Data Abroad**

All personal data will be placed on systems within the UK or European Economic Area. However, it should be noted that our website is accessible from overseas, so some personal data may be accessed abroad.

### **Further Processing**

If we wish to use your personal data for a new purpose, not covered by this Privacy Notice, then we will provide you with a separate notice explaining this new use prior to commencing the processing. Where and whenever necessary, we will seek your prior consent to the new processing.

### **Contact Details**

To exercise all relevant rights or if you have any questions about this Privacy Notice, please contact:

The Parish Clerk  
Odiham Parish Council  
The Bridewell  
The Bury  
Odiham  
RG29 1NB  
Email: [clerk@odihamparishcouncil.gov.uk](mailto:clerk@odihamparishcouncil.gov.uk)

### **Changes to this notice**

We keep this Privacy Notice under regular review and will place any updates on this web page.  
Last update **July 2023**.



# **SUBJECT ACCESS REQUEST POLICY**

**Reviewed and adopted on ~~18<sup>th</sup> July 2023~~**

## **1. Introduction**

Under Data Protection laws individuals may request information about the personal data processed by the Parish Council (a subject access request). Under GDPR the council must now respond without undue delay and in any case within one calendar month of receipt of the request.

## **2. Responding to a Subject Access Request**

- Where a request is made electronically, the information should be provided by electronic means where possible, unless otherwise requested by the data subject.
- The information must be communicated in a concise, transparent, intelligible and easily accessible form, using clear and plain language.
- The right to obtain a copy of information should not adversely affect the rights and freedoms of others. Personal data about a third party must be redacted from any information provided unless the third party has agreed to its inclusion.

## **3. Fees**

- Information must be provided free of charge under the GDPR.
- A reasonable fee may be charged if the request from a data subject is “manifestly unfounded or excessive”. A reasonable fee can also be charged for supplying further copies of the same information. The fee must be based upon the actual administrative cost of providing the information.

## **4. Timescale**

- The information requested must be provided without delay and at the latest within one month of receipt of the request.
- The timescale can be extended up to three months if the information requested is complex or numerous, but the subject must be told within one month how much extra time is required and why.
- The date of receipt of the request is when the request has been proven to be valid.

## **5. Identification of Requester**

Personal data can only be disclosed to the relevant person, so the data controller should request further information to confirm their identity.

## **6. Summary of Requirements**

- On receipt a subject access request, it must be forwarded immediately to the data controller;
- Correctly identify whether a request has been made under the Data Protection legislation;
- An exhaustive search of all records must be made to locate the personal data;
- All personal data that has been requested must be provided unless an exemption can be supplied;
- The response must be made within one month after accepting that the request is valid;
- Subject Access Requests must be undertaken free of charge to the requestor unless the legislation permits reasonable fees to be charged.
- Cllrs and managers must ensure that all staff are aware of and follow this guidance.
- Where the requester is not satisfied with a response to a SAR, the council must manage this as a complaint.

### **Subject Access Request Procedure**

#### **1. Receipt of SAR:**

Upon receipt of request – notify the Parish Clerk who will organise the process.  
Requests must be in writing.

#### **2. Log the Request**

Enter details of the request in the SAR log.

#### **3. Confirmation of Requirement**

If necessary, clarify with the requestor what personal data they need.

#### **4. Identification**

The requestor must provide his/her address and supply valid evidence to prove their identity. The council accepts the following forms of ID:

- Current UK/EEA passport
- UK driving licence – photocard or paper
- EEA National Identity Card
- Council tax bill/demand or statement (dated in last 12 months)
- Financial statement – bank, building society or credit card (dated in past 3 months)
- Mortgage statement (dated in last 12 months)
- Tenancy agreement
- Utility bill (dated last 3 months)
- HMRC tax credit document or state benefits/pension entitlement document (dated in last 12 months)
- HMRC tax notification document (last 12 months)

NB. The request is only valid from the date the identity has been confirmed.

#### **5. Confirmation of Fees**

Requests are normally free of charge unless the request is “manifestly excessive or unfounded”. The subject must be informed of this.

#### **6. Confirmation of Timescale**

Following the validation of the request, the council has one calendar month to respond. If more time is needed, the subject must be told within the first month.

#### **7. Information Search**

- Carry out a full and exhaustive search of all records - paper and electronic. This will involve searching emails (incl. archived or deleted where recoverable), word documents, spreadsheets, databases, systems, removable media (memory sticks, CDs etc.), recordings and all paper records in relevant filing systems.
- No personal data should be withheld unless an exemption can be applied. Redact any exempt personal data from the documents to be released.

#### **8. Provision of Information**

- You must not withhold personal data because you believe it will be misunderstood; instead you should provide an explanation with the personal data. The data must be provided in an “intelligible form” i.e. explaining codes, acronyms or complex terms.
- The data must be supplied in a permanent form except where agreement is reached with the subject that this would be impossible or involve undue effort in which case they may view files on our premises or on screen. You must redact any exempt personal data from the released documents and explain why that personal data is being withheld.
- If any data has been withheld, you must explain why there is an exemption(s).
- Covering letters must include the following information:
  - The categories of personal data held;
  - The reasons for holding the data;
  - To whom this data has been disclosed (or will be disclosed);
  - The length of time the data will be stored (where possible);
  - From whom the data has been collected (if not from the subject);
  - The subject’s rights to object or to have data corrected or erased;
  - The right to lodge a complaint with the Information Commissioner’s Office (ICON).

#### **9. Update Log**

Ensure the log lists the details of the SAR, the necessary dates and all documentation provided.

#### **10. Complaint**

If the requestor is not satisfied with the response to the SAR, the council must treat this as a complaint which is covered by the complaints procedure.

**REPORT ON:** Picnic benches  
**WRITTEN BY:** Parish Clerk  
**MEETING DATE:** 21<sup>st</sup> April 2026  
**AGENDA ITEMS:** 310/25

## Introduction

Five timber benches were sited in OPC's open spaces in 2023 for a total cost of £750; 2 at Beacon Field, 2 in Chamberlain Gardens and 1 in Chapel Pond play area.



The simple and inexpensive product was intentionally selected because it had a limited lifespan and could easily be replaced. The benches are not fixed in the ground so people can move them around each site and to make it easier for the grass cutting contractor.

The Council subsequently made the decision to keep the benches out during the Winter months and to treat the timber. Three years on, it has only been necessary take the bench at Chapel Pond Drive out of action, potentially due to vandalism?

For the last couple of years, permission has been given to InOdiham to move some of the benches to the High St for the Odiham Food Fayre festival.

## For decision

There is an estimated £2,100 available in the bench/noticeboard budget.

Would Councillors like to add any picnic benches in time for Summer 2026?

See example prices from the company used in 2023:

<https://wellstimmer.co.uk/product-category/wholesale-picnic-benches-multi-buy-deals/>

**REPORT ON:**  
**WRITTEN BY:**  
**MEETING DATE:**  
**AGENDA ITEM:**

Earmarked Reserves for projects  
 Parish Clerk  
 21.04.26

**Year end @ 31.03.26**

Bank balances

CCLA Public Sector Deposit Fund	135,862.88
Hampshire Trust Bank	54,656.72
Lloyds 30 day notice (G Rothery)	0.00
Unity Trust	38,823.64
Lloyds Treasurer's account	0.00
	229,343.24

Represented by

Earmarked reserves	80,995.67
General reserves	148,347.57

Approx number of months running costs:

Based on 2025-26 budget (no project costs)	6.92
Based on 2026-27 budget (no project costs)	6.07

**Proposed by the Finance Committee for 01.04.26**

	Position @ 31.03.26	Proposed by Finance Committee	EMR if proposal accepted (rounded up)
<b>Capital:</b>			
Allotment deposits	655.00		655.00
Bufton Field play area	918.50		918.50
Crownfields car park management		Moved from earmarked	5,000.00
Village gateway		Moved from earmarked	4,500.00
<b>Earmarked:</b>			
IT support/upgrade	1,944.04	RETAIN – For equipment upgrades required for Clerk's laptop, Amenities Officer's PC and building EMR for Deputy Clerk's laptop and Clerk's desktop. ESTIMATED SPEND WITHIN 3 YEARS.	2,000.00
Election expenses	5,000.00	? To be determined	5,000.00
Cemetery maintenane and improvements	3,152.00	REFER to Amenities Committee to determine whether full extent of improvements have been completed.	3,150.00
Chapel building maintenance	4,231.94	REFER to Amenities Committee to determine whether works required.	4,300.00
Chapel Cottage maintenance	0.00	RETAIN HEADING	0.00
War Memorial	0.00	ADD £6,470 from general reserves to cover cost of next two stages of repair works in 2026. ESTIMATED SPEND WITHIN 1 YEAR.	6,500.00
Play area replacement	7,730.59	RETAIN and add unspent £9,500 from 25/26. Research in progress for Chamberlain Gardens play area. ESTIMATED SPEND 1 YEAR.	17,500.00
Benches and noticeboards	1,682.20	RETAIN and add unspent £1,000 from 25/26. ESTIMATED SPEND WITHIN 2 YEARS.	2,700.00
Parish Room maintenance	1,205.32	RETAIN and add unspent £1,459 from 25/26. Building reserve for wall repair. ESTIMATED SPEND 3 YEARS.	2,700.00
Revaluation of buildings	275.00	ZERO BALANCE.	0.00
Climate Action Plan	2,878.30	RETAIN – For Bridewell energy saving works and add unspent £500 from 25/26. ESTIMATED SPEND WITHIN 2 YEARS.	3,400.00
Rights of way	4,427.82	£2,500 allocated to project at Bartley Heath. ESTIMATED SPEND WITHIN 1 YEAR.	4,500.00
Development of sustainable travel	3,187.31	RETAIN – For cycle racks in The Bury area. ESTIMATED SPEND WITHIN 2 YEARS.	3,200.00
Supporting the High St	4,668.97	RETAIN – funds already committed for flagpoles. ESTIMATED SPEND WITHIN 2 YEARS.	4,700.00
Tree survey	1,000.00	DELETE – Budget expenditure in 2027.	0.00
The Bridewell	19,059.50	RETAIN – for ongoing Bridewell works and fees for professional support and add unspent £2,697 from 25/26. Funds now allocated. ESTIMATED SPEND WITHIN 3 YEARS.	21,700.00
Community grants	2,340.00	? COUNCIL DECISION REQUIRED - Funds have been held for successful applicants but deadlines have now passed. Auditor recommendation to delete.	0.00
Public toilets R&M	84.18	ZERO BALANCE AND DELETE.	0.00
Crownfields car park management	5,000.00	RETAIN - S106 developers contribution for maintenance of pre-school land. Move to capital reserve.	0.00
Village gateway	4,000.00	RETAIN - S106 developers contribution for village gateway. Move to capital reserve.	0.00
Bus shelter	455.00	RETAIN – this sum has been spent on replacement seat. Should be earmarking for future replacement.	500.00
Allotments	500.00	REFER to Amenities Areas Committee – fence repair required and improvements to boundary with road (poss biodiversity improvements).	500.00
Tree works	100.00	DELETE – This is a revenue cost.	0.00
Flags	500.00	RETAIN – additional flags required for new flagpoles. ESTIMATED SPEND WITHIN 2 YEARS.	500.00
The Firs	6,000.00	RETAIN – project in progress. ESTIMATED SPEND WITHIN 1 YEAR.	6,000.00
Bins	0.00	RETAIN HEADING	0.00
Professional fees	0.00	Add unspent £2,449 from 25/26. Funds already committed towards Bridewell PM fees. ESTIMATED SPEND WITHIN 2 YEARS.	2,500.00
	80,995.67		102,423.50

Approx number of months running costs  
 (if proposed reserves agreed)

5.19