



Saxmundham Town Council

Minutes of the meeting of the Resources Committee held on Tuesday 6th January 2026
at the Town House, Station Approach, Saxmundham at 12:00 pm.

Minutes

78/25RC Attendees

CLlr Elizabeth Clark (Chair)
CLlr John Fisher
CLlr John Findlay

Apologies

CLlr Tim Lock – not accepted

Also Present

Sharon Smith (Town Clerk)

79/25RC Declaration of Interests

None.

80/25RC Open Forum

None.

81/25RC Minutes

It was **unanimously resolved** that the minutes of the meeting held on 2nd December 2025 are a true and accurate record.

82/25RC Monthly Reports

- a) It was **unanimously resolved** to approve the payments and note the receipts for December 2025.
- b) The Committee noted the bank balances as at 31st December 2025.
- c) The Chair verified the bank reconciliations as at 31st December 2025.
- d) The Committee reviewed the Budget versus Actual Income and Expenditure Report as at 31st December 2025, including the year-end forecast.

83/25RC Precept Increase 2026-2027

The Committee received an explanation from the Town Clerk regarding the Committee's original recommendation at its last meeting for an 11% precept increase for 2026–2027, and the subsequent use of an earmarked reserve which enabled the Town Council to approve a revised 10% increase at its December 2025 meeting.

84/25TC Budget Overspends

- a) It was **unanimously resolved** to approve expenditure for bespoke data protection training from Breakthrough Communications for all staff to support compliance with the requirements of AGAR Assertion 10, noting that the staff training budget for 2025-2026 is already overspent and that approval of this expenditure will increase that variance. It was further agreed that all Councillors be invited to attend the training session.

Signed _____ Date _____

- b) The Committee considered a staffing matter and its potential budgetary implications for 2026–2027. Following discussion, the Committee confirmed its commitment to the previously approved budget for 2026–2027 and resolved not to approve any amendment to that budget.

85/25TC Earmarked Reserve Expenditure

The Committee received an update from the Town Clerk on the earmarked reserve expenditure on new play equipment for Seaman Avenue play park.

86/25RC Next Meeting

It was **unanimously resolved** to the reschedule of the next Committee meeting from 3rd February 2026 to 10th February 2026 due to the Town Clerk's approved study leave.

The meeting closed at 12:55 pm.

Sharon Smith
Town Clerk/RFO

Signed _____ Date _____

SAXMUNDHAM TOWN COUNCIL - JANUARY 2026

01/01/2026

Balance Brought Forward - Unity Trust Bank Current	£46,848.97
Balance Brought Forward - Unity Trust Bank Savings	£20,299.49
Balance Brought Forward - Cambridge Building Society	£20,000.00
Balance Brought Forward - Public Sector Deposit Fund	£150,000.00
	£237,148.46

Payments/Transfers from Unity Trust Bank Current

Invoice Date	PO No	Supplier	Description	Gross	VAT	Net	Code	Authority
05/01/2026	n/a	HMRC	PAYE - Month 9	£2,408.84	£0.00	£2,408.84	4000	Pre-Approved Payments List
24/01/2026	n/a	Nest	Pensions - Month 10	£506.72	£0.00	£506.73	4000	Pre-Approved Payments List
24/01/2026	n/a	Staff Salaries	Salaries - Month 10	£7,668.22	£0.00	£7,668.22	4000	Pre-Approved Payments List
10/01/2026	n/a	EE	Mobile Phone - Month 10	£19.20	£3.20	£16.00	4260	Pre-Approved Payments List
29/12/2025	n/a	The Cleaning Company	Cleaning - Month 9	£229.75	£38.29	£191.46	4200	Pre-Approved Payments List
05/01/2026	n/a	Smartest Energy	Electricity - Month 9	£58.60	£2.79	£55.81	4205	Pre-Approved Payments List
05/01/2026	n/a	Smartest Energy	Gas - Month 9	£161.75	£7.70	£154.05	4205	Pre-Approved Payments List
13/01/2026	n/a	Everflow	Water - Month 10	£8.52	£0.00	£8.52	4205	Pre-Approved Payments List
05/01/2026	n/a	Wave	Water - Recreation Ground	£2.68	£0.00	£2.68	4205	Pre-Approved Payments List
31/01/2026	n/a	Unity Trust Bank	Bank Charges - Month 10	£14.10	£0.00	£14.10	4235	Pre-Approved Payments List
17/12/2025	n/a	Red Dune	IT Services - Month 9	£405.60	£67.60	£338.00	4255	Pre-Approved Payments List
01/01/2026	n/a	Red Dune	Broadband - Quarter 3	£162.00	£27.00	£135.00	4260	Pre-Approved Payments List
01/01/2026	n/a	Red Dune	Line Rental - Quarter 3	£37.09	£6.18	£30.91	4260	Pre-Approved Payments List
24/12/2025	n/a	OfficeFlow	Photocopier Service Charge - Month 10	£109.07	£18.18	£90.89	4240	Pre-Approved Payments List
01/01/2025	59/25TC	East Suffolk Services	Refuse Collection - Quarter 4	£179.41	£29.90	£149.51	4210	Pre-Approved Payments List
19/12/2025	61/25TC	Grenke	Photocopier Lease - Quarter 4	£298.51	£49.75	£248.76	4240	Pre-Approved Payments List
08/12/2025	50/25TC	Target Animations	Christmas Lights	£7,320.00	£1,220.00	£6,100.00	4560	Pre-Approved Payments List
19/12/2025	64/25TC	Palmers Fencing	Christmas Fayre - Traffic Management	£1,536.00	£256.00	£1,280.00	4505	Civic and Community Committee - 15/25CC
19/12/2025	91/25TC	Ingham Pinnock Associates	Market Hall Feasibility Study (50%)	£3,600.00	£600.00	£3,000.00	4705/EMR 333	Town Council - 77/25TC
20/01/2026	n/a	Market Hall	Stationery	£9.98	£1.66	£8.32	4245	Pre-Approved Payments List
20/01/2026	n/a	Market Hall	Councillor Tablet Covers x 3	£21.57	£3.60	£17.97	4255	Pre-Approved Payments List
20/01/2026	n/a	Market Hall	Green Team - Tools	£121.52	£0.00	£121.52	4810	Pre-Approved Payments List
20/01/2026	n/a	Market Hall	General Supplies	£122.21	£20.37	£101.84	4265	Pre-Approved Payments List
20/01/2026	n/a	Market Hall	General Supplies	£3.02	£0.50	£2.52	4265	Pre-Approved Payments List
20/01/2026	n/a	Market Hall	Christmas Fayre - Street Decorations	£47.59	£7.90	£39.66	4505	Civic and Community Committee - 15/25CC
20/01/2026	n/a	Market Hall	Christmas Fayre - Santa's Grotto Presents	£16.24	£2.71	£13.53	4505	Civic and Community Committee - 15/25CC
19/01/2026	94/25TC	Rookery Farm	Christmas Fayre - Trees	£636.00	£106.00	£530.00	4505	Amenities and Services Committee - 47/25AS
13/01/2026	n/a	SL Plumbing and Heating	Town House Maintenance	£113.00	£0.00	£113.00	4670	Pre-Approved Payments List
12/01/2026	n/a	Viking	Stationery	£107.94	£18.00	£89.94	4245	Pre-Approved Payments List
06/01/2026	n/a	Viking	Stationery	£29.32	£4.89	£24.43	4245	Pre-Approved Payments List
12/01/2026	n/a	ESPO	General Supplies	£41.88	£6.98	£34.90	4265	Pre-Approved Payments List
01/01/2026	n/a	Fishers	General Supplies	£72.99	£0.00	£72.99	4265	Pre-Approved Payments List
11/01/2026	n/a	Aubergine	Annual Town Council Website Domain	£120.00	£20.00	£100.00	4405	Pre-Approved Payments List
30/11/2025	n/a	WorkNest	HR Support	£275.40	£45.90	£229.50	4705	Staffing Committee - 24/25SC
16/01/2026	n/a	Gipping Occupational Health Ltd	Management Referral	£324.00	£54.00	£270.00	4705	Staffing Committee - 35/25SC
16/01/2025	n/a	Breakthrough Communications	Data Protection Training - All Staff/Councillors	£594.00	£99.00	£495.00	4095	Resources Committee - 84/25TC
19/01/2026	n/a	The Saxmundham and District CIC	Hall Hire	£36.00	£0.00	£36.00	4220	Pre-Approved Payments List
13/05/2025	n/a	The Saxmundham and District CIC	Hall Hire	£30.00	£0.00	£30.00	4220	Pre-Approved Payments List
23/09/2025	n/a	The Saxmundham and District CIC	Hall Hire	£45.00	£0.00	£45.00	4220	Pre-Approved Payments List
18/02/2025	78/25TC	East Suffolk Services	Grounds Maintenance Contract - October 2025 to March 2026	£1,787.22	£297.87	£1,489.35	4815	Pre-Approved Payments List
19/01/2026	52/25TC	Suffolk Association of Local Councils	Training - CiLCA - Deputy Town Clerk	£302.40	£50.40	£252.00	4095	Staffing Sub-Committee - 40/24SSC
20/01/2026	n/a	Unity Trust Bank	Transfer to Savings Account	£19,700.51	£0.00	£19,700.51	n/a	n/a
26/01/2026	n/a	Unity Trust Bank	Transfer to Savings Account	£10,000.00	£0.00	£10,000.00	n/a	n/a
26/01/2026	n/a	Market Hall	VAT Recovery - Quarter 3	£613.38	£0.00	£613.38	106	n/a
26/01/2026	n/a	Gannon Institute	VAT Recovery - Quarter 3	£290.27	£0.00	£290.27	106	n/a
				£60,187.50	£3,066.37	£46,217.46		

Lloyds Bank Multipay Card

Invoice Date	PO No	Supplier	Description	Gross	VAT	Net	Code	Authority
29/12/2025	n/a	Lloyds Bank	Monthly Fee	£3.00	£0.00	£3.00	4235	Pre-Approved Payments List
21/12/2025	n/a	Amazon	Charged in Error - Reimbursed by Deputy Town Clerk	£0.99	£0.00	£0.99	4245	n/a
21/12/2025	n/a	Amazon	Charged in Error - Reimbursed by Deputy Town Clerk	£19.92	£0.00	£19.92	4245	n/a
				£23.91	£0.00	£23.91		

Receipts to Unity Trust Bank Current

Received	Invoice No	Payer	Description	Amount	Code
05/01/2026	n/a	CCLA	Bank Interest	£497.56	1090
20/01/2026	n/a	HMRC	VAT Recovery - Quarter 3	£16,710.50	105
20/01/2026	TC104	Gannon Institute Trust	Cleaning Reimbursement - Month 9	£50.60	4200
15/01/2026	TC66	Stall Holder	Monthly Market - October	£15.00	1100
15/01/2026	TC69	Stall Holder	Monthly Market - November	£15.00	1100
07/01/2026	TC101	Stall Holder	Weekly Market - December	£27.00	1100
12/01/2026	TC102	Stall Holder	Weekly Market - December	£27.00	1100
16/01/2026	TC80	Stall Holder	Christmas Fayre	£30.00	1100
15/01/2026	TC85	Stall Holder	Christmas Fayre	£20.00	1100
15/01/2026	TC88	Stall Holder	Christmas Fayre	£30.00	1100
19/01/2026	TC94	Stall Holder	Christmas Fayre	£30.00	1100
19/01/2026	TC100	Stall Holder	Christmas Fayre	£20.00	1100
30/01/2026	TC86	Stall Holder	Christmas Fayre	£30.00	1100
16/01/2026	n/a	Deputy Town Clerk	Credit Card Reimbursement	£20.91	4245
28/01/2026	n/a	Sax Community Fest	Memorial Field Hire	£50.00	1110
				£17,573.57	

Transfers to Unity Trust Bank Savings

Received	Invoice No	Payee	Description	Amount
20/01/2026	n/a	Unity Trust Bank Savings	Transfer	£19,700.51
26/01/2026	n/a	Unity Trust Bank Savings	Transfer	£10,000.00
				£29,700.51

Receipts to Cambridge Building Society

Received	Invoice No	Payee	Description	Amount	Code
31/12/2025	n/a	Cambridge Building Society	Bank Interest	£1,395.75	1090
				£1,395.75	
		31/01/2026	Balance Carried Forward - Unity Trust Bank Current	£4,211.13	
			Balance Carried Forward - Unity Trust Bank Savings	£50,000.00	
			Balance Carried Forward - Cambridge Building Society	£21,395.75	
			Balance Carried Forward - Public Sector Deposit Fund	£150,000.00	
				£225,606.88	

Town Council Budget Versus Actual Income and Expenditure 2025-2026

Line Number	Cost Centre	Nominal Code	Item	Approved Budget 2025-2026	Income and Expenditure 31/01/26	Committed 31/01/26	Actual Plus Committed 31/01/26	Actual Plus Committed Percentage	Forecast Income and Expenditure to 31/03/26	Forecast Total to 31/03/26	Forecast Percentage to 31/03/26	Forecast Surplus/Deficit
INCOME												
RESOURCES COMMITTEE												
1	100	1076	Precept	£ 278,037	£ 278,037	£ -	£ 278,037	100%	£ -	£ 278,037	100%	
2	101	1150	Community Infrastructure Levy	£ -	£ -	£ -	£ -		£ -	£ -		
3	102	1105	Charitable Trusts' Reimbursement	£ -	£ -	£ -	£ -		£ -	£ -		
4	103	1090	Bank Interest	£ 4,000	£ 5,540	£ -	£ 5,540	139%	£ 700	£ 6,240	156%	£ 2,240
			Total	£ 282,037	£ 283,577	£ -	£ 283,577		£ 700	£ 284,277		
CIVIC AND COMMUNITY COMMITTEE												
5	110	1305	Civic Grants	£ -	£ -	£ -	£ -		£ -	£ -		
6	105	1100	Market Stallage/Christmas Event	£ 1,800	£ 2,383	£ -	£ 2,383	132%	£ 162	£ 2,545	141%	£ 745
			Total	£ 1,800	£ 2,383	£ -	£ 2,383		£ 162	£ 2,545		
AMENITIES AND SERVICES COMMITTEE												
7	107	1110	Land Rental	£ 603	£ 951	£ 2	£ 953	158%	£ -	£ 953	158%	£ 350
8	106	1310	Project Grants	£ -	£ -	£ -	£ -		£ -	£ -		
	103	1320	Greener Sax Community Garden	£ -	£ -	£ -	£ -		£ -	£ -		
			Total	£ 603	£ 951	£ 2	£ 953		£ -	£ 953		
			TOTAL INCOME	£ 284,440	£ 286,911	£ 2	£ 286,913		£ 700	£ 287,775		£ 3,335
EXPENDITURE												
STAFFING COMMITTEE												
9	120	4000	Salaries	£ 125,683	£ 101,565	£ 20,713	£ 122,278	97%	£ -	£ 122,278	97%	£ 3,405
10	120	4050	Staff Expenses	£ -	£ 39	£ -	£ 39		£ -	£ 39		£ 39
11	120	4055	Payroll Service	£ 350	£ 186	£ 186	£ 372	106%	£ -	£ 372	106%	£ 22
12	120	4060	Recruitment	£ 100	£ -	£ -	£ -	0%	£ -	£ -	0%	£ 100
13	120	4095	Staff Training and Development	£ 2,500	£ 3,648	£ -	£ 3,648	146%	£ -	£ 3,648	146%	£ 1,148
14	140	4120	Councillor Training and Development	£ 300	£ 1,454	£ -	£ 1,454	485%	£ -	£ 1,454	485%	£ 1,154
			Total	£ 128,933	£ 106,892	£ 20,899	£ 127,791		£ -	£ 127,791		
RESOURCES COMMITTEE												
15	140	4105	Councillor Expenses	£ 50	£ 146	£ -	£ 146	292%	£ -	£ 146	292%	£ 96
16	140	4275	Elections Contingency	£ 1,000	£ 1,000	£ -	£ 1,000	100%	£ -	£ 1,000	100%	£ -
17	160	4200	Town House Cleaning	£ 3,000	£ 2,067	£ 358	£ 2,425	81%	£ -	£ 2,425	81%	£ 575
18	160	4205	Town House/Youth Booth Utilities	£ 3,200	£ 2,190	£ -	£ 2,190	68%	£ 740	£ 2,930	92%	£ 270
19	160	4210	Town House Refuse Collection	£ 1,250	£ 1,417	£ -	£ 1,417	113%	£ -	£ 1,417	113%	£ 167
20	160	4220	Meeting Room Hire	£ 600	£ 936	£ -	£ 936	156%	£ -	£ 936	156%	£ 336
21	160	4228	Financial Software	£ 3,500	£ 3,261	£ 1,898	£ 1,363	39%	£ -	£ 1,363	39%	£ 2,137
22	160	4230	Internal and External Audit	£ 1,250	£ 1,154	£ -	£ 1,154	92%	£ -	£ 1,154	92%	£ 96
23	160	4235	Bank Charges	£ 153	£ 169	£ -	£ 169	110%	£ 30	£ 199	130%	£ 46
24	160	4240	Photocopier Lease and Toner	£ 2,000	£ 1,822	£ -	£ 1,822	91%	£ 200	£ 2,022	101%	£ 22
25	160	4245	Stationery	£ 1,300	£ 567	£ 20	£ 587	45%	£ 50	£ 637	49%	£ 663
26	160	4250	Subscriptions	£ 1,800	£ 2,047	£ 7	£ 2,054	114%	£ -	£ 2,054	114%	£ 254
27	160	4255	IT Support	£ 4,050	£ 4,417	£ 1,014	£ 5,431	134%	£ -	£ 5,431	134%	£ 1,381
28	160	4260	Telephone and Broadband	£ 1,000	£ 821	£ 38	£ 859	86%	£ -	£ 859	86%	£ 141
29	160	4265	Town House Equipment and Supplies	£ 1,000	£ 1,428	£ -	£ 1,428	143%	£ -	£ 1,428	143%	£ 428
30	160	4270	Insurance	£ 1,800	£ 4,953	£ 2,822	£ 2,131	118%	£ -	£ 2,131	118%	£ 331
31	310	4615	Legal Consultancy	£ 1,000	£ 750	£ -	£ 750	75%	£ -	£ 750	75%	£ 250
32	310	4705	Project Consultancy	£ 6,000	£ 6,303	£ -	£ 6,303	105%	£ -	£ 6,303	105%	£ 303
33	170	4300	Town House - PWLB Repayment	£ 10,700	£ 10,689	£ -	£ 10,689	100%	£ -	£ 10,689	100%	£ 11
34	170	4406	Gannon Institute - PWLB Repayment	£ 2,903	£ 1,465	£ 1,438	£ 2,903	100%	£ -	£ 2,903	100%	£ 0
			Total	£ 47,556	£ 47,602	£ 1,845	£ 45,757		£ 1,020	£ 46,777		
						£ -						
CIVIC AND COMMUNITY COMMITTEE												
35	200	4400	Newsletter and Publicity	£ 1,500	£ 1,055	£ -	£ 1,055	70%	£ -	£ 1,055	70%	£ 445
36	200	4405	Website Support and Development	£ 4,000	£ 4,663	£ 1,275	£ 5,938	148%	£ 150	£ 6,088	152%	£ 2,088
37	140	4100	Chairs Civic Allowance	£ 400	£ 310	£ -	£ 310	78%	£ -	£ 310	78%	£ 90
38	200	4825	Markets Support	£ 500	£ 289	£ -	£ 289	58%	£ 211	£ 500	100%	£ -
39	300	4555	Community Grants	£ 34,500	£ 26,300	£ 7,624	£ 33,924	98%	£ 576	£ 34,500	100%	£ -
40	320	4505	Events	£ 10,000	£ 7,222	£ -	£ 7,222	72%	£ 2,778	£ 10,000	100%	£ -
41	320	4560	Christmas Lights and Trees	£ 6,700	£ 6,630	£ -	£ 6,630	99%	£ -	£ 6,630	99%	£ 70
			Total	£ 57,600	£ 46,469	£ 8,899	£ 55,368		£ 3,715	£ 59,083		
AMENITIES AND SERVICES COMMITTEE												
42	600	4670	Town House Building Maintenance	£ 250	£ 1,436	£ 620	£ 2,056	822%	£ -	£ 2,056	822%	£ 1,806
43	160	4285	Town House Health and Safety	£ 1,100	£ 1,077	£ -	£ 1,077	98%	£ -	£ 1,077	98%	£ 23
			Total	£ 1,350	£ 2,513	£ 620	£ 3,133		£ -	£ 3,133		
AMENITIES AND SERVICES COMMITTEE												
44	500	4829	Memorial Field	£ 6,000	£ 2,045	£ 1,077	£ 3,122	52%	£ -	£ 3,122	52%	£ 2,878
45	500	4830	Street Furniture	£ 3,000	£ 2,127	£ 452	£ 2,579	86%	£ -	£ 2,579	86%	£ 421

TOWN COUNCIL THREE YEAR FORECAST BUDGET 2027-2029

Line Number	Cost Centre	Nominal Code	Item	2026-2027	2027-2028	2028-2029
			Band D Property Per Annum	£ 181.65	£ 190.74	£ 200.27
			Percentage Increased to Current Year	0%	5%	5%
			Increase Compared To Current Year	£ 16.51	£ 25.60	£ 35.13
			Band D Property Per Week	£ 3.49	£ 3.67	£ 3.85
			INCOME			
			RESOURCES COMMITTEE			
1	100	1076	Precept	£ 304,121	£ 319,327	£ 335,293
2	103	1090	Bank Interest	£ 6,000	£ 6,150	£ 6,615
			Total	£ 310,121	£ 325,477	£ 341,908
			CIVIC AND COMMUNITY COMMITTEE			
3	105	1100	Market Stallage Fees	£ 2,000	£ 2,100	£ 2,205
			Total	£ 2,000	£ 2,100	£ 2,205
			AMENITIES AND SERVICES COMMITTEE			
4	107	1110	Land Rental	£ 660	£ 693	£ 728
			Total	£ 660	£ 693	£ 728
			TOTAL INCOME	£ 312,781	£ 328,270	£ 344,841
			EXPENDITURE			
			STAFFING COMMITTEE			
5	120	4000	Salaries	£ 151,375	£ 158,944	£ 166,891
6	120	4050	Staff Expenses	£ 100	£ 105	£ 110
7	120	4055	Payroll Service	£ 448	£ 470	£ 494
8	120	4060	Recruitment	£ 100	£ 105	£ 110
9	120	4095	Staff Training and Development	£ 1,500	£ 1,575	£ 1,654
10	140	4120	Councillor Training and Development	£ 315	£ 331	£ 348
			Total	£ 153,838	£ 161,530	£ 169,607
			RESOURCES COMMITTEE			
11	140	4105	Councillor Expenses	£ 200	£ 210	£ 221
12	140	4275	Elections Contingency	£ 1,000	£ 1,000	£ 1,000
13	160	4200	Town House Cleaning	£ 3,500	£ 3,675	£ 3,859
14	160	4205	Town House Utilities	£ 2,800	£ 2,940	£ 3,087
15	160	4210	Town House Refuse Collection	£ 1,500	£ 1,575	£ 1,654
16	160	4220	Meeting Room Hire	£ 850	£ 893	£ 938
17	160	4228	Financial Software	£ 4,500	£ 4,725	£ 4,961
18	160	4230	Internal and External Audit	£ 1,200	£ 1,260	£ 1,323
19	160	4235	Bank Charges	£ 250	£ 263	£ 276

20	160	4240	Photocopier Toner	£	1,500	£	1,575	£	1,654
21	160	4240	Photocopier Lease	£	1,000	£	1,050	£	1,103
22	160	4245	Stationery	£	700	£	735	£	772
23	160	4250	Subscriptions	£	2,300	£	2,415	£	2,536
24	160	4255	IT Services	£	4,200	£	4,410	£	4,631
25	160	4255	Video Conferencing Equipment	£	3,500	£	-	£	-
26	160	4255	IT Equipment	£	1,000	£	-	£	-
27	160	4260	Telephone and Broadband	£	950	£	998	£	1,048
28	160	4265	Town House Equipment and Supplies	£	1,000	£	1,050	£	1,103
29	160	4270	Insurance	£	2,500	£	2,625	£	2,756
30	310	4615	Legal Consultancy	£	1,250	£	1,313	£	1,379
31	310	4705	Project Consultancy	£	5,000	£	5,250	£	5,513
32	170	4406	Gannon Institute - PWLB Repayment	£	2,793	£	2,684	£	2,574
			Total	£	43,493	£	40,644	£	42,384
			CIVIC AND COMMUNITY COMMITTEE						
33	200	4400	Communication and Branding	£	1,500	£	1,575	£	1,654
34	200	4405	Website Support	£	1,000	£	1,050	£	1,103
35	140	4100	Chairs Civic Allowance	£	500	£	525	£	551
36	200	4825	Markets Support	£	500	£	525	£	551
37	300	4555	Community Grants	£	34,500	£	36,225	£	38,036
38	500	4830	Family Trail Update	£	500	£	-	£	-
39	320	4505	Events	£	10,000	£	10,500	£	11,025
40	320	4560	Christmas Trees and Lights	£	6,650	£	6,983	£	7,332
			Total	£	55,150	£	57,383	£	60,252
			AMENITIES AND SERVICES COMMITTEE						
41	600	4670	Town House Maintenance	£	2,000	£	2,100	£	2,205
42	160	4285	Health and Safety	£	3,300	£	-	£	-
43	500	4829	Memorial Field	£	6,000	£	2,500	£	2,625
44	500	4830	Street Furniture including Hanging Baskets	£	5,000	£	5,250	£	5,513
45	500	4810	Green Team Activities	£	3,000	£	3,150	£	3,308
46	500	4815	Grounds Maintenance	£	4,500	£	4,725	£	4,961
47	500	4821	Tree Survey and Maintenance	£	2,000	£	2,100	£	2,205
48	600	4650	General Town Maintenance	£	500	£	525	£	551
49	600	4675	Youth Booth Maintenance	£	600	£	630	£	6,962
50	500	4820	Play Equipment Inspection and Maintenance	£	4,000	£	4,200	£	4,410
51	500	4827	Saxon Road Allotment Garden	£	5,000	£	1,000	£	1,050
52	500	4830	Chapel Road Bench and Planters	£	2,400	£	-	£	-
53	500	4828	Town House Rainwater Harvesting	£	2,000	£	-	£	-
			Total	£	40,300	£	26,180	£	33,789
			CHARITABLE TRUSTS						
54	300	4500	Market Hall Contingency	£	15,000	£	15,750	£	16,538
55	300	4501	Gannon Institute Contingency	£	5,000	£	5,250	£	5,513
				£	20,000	£	21,000	£	22,050
			TOTAL EXPENDITURE	£	312,781	£	306,736	£	328,082
			TOTAL INCOME	£	312,781	£	328,270	£	344,841

			TOTAL EXPENDITURE	£	312,781	£	306,736	£	328,082
			VARIANCE	£	-	£	21,534	£	16,759



SAXMUNDHAM TOWN COUNCIL

DATA AUDIT 2025-2026

Review Body: Resources Committee
Policy Approved: Town Council
Approval Date: February 2026
Minute Item:
Review Period: Annual
Next Review: February 2027



The purpose of a data audit is to map the data that the Town Council processes as a Data Controller, identify the purpose and lawful basis for that processing, and record who has access to the data. It is an essential step in assessing any risks associated with the Town Council's data processing activities and ensuring compliance with the Data Protection Act 2018 and UK GDPR.

Governance and Democratic Functions						
Subject	Purpose of processing	Categories of Personal Data	Joint Controllers	Categories of Individuals	Article 6 lawful basis for processing	Article 9 condition for processing special category data
Minutes	<p>To create and maintain an accurate legal record of Town Council and Committee decisions, discussions and actions, including matters raised by parish residents and members of the public during open meetings. Minutes must be published in accordance with the Transparency Code for Smaller Authorities and the Local Government Act 1972.</p> <p>Information is provided verbally by attendees during public participation or discussion at meetings.</p>	<p>Names of parish residents or members of the public who speak (where recorded).</p> <p>Summary of issues raised or representations made.</p> <p>Any personal information individuals disclose in their statements (discouraged but sometimes offered voluntarily).</p>	None. The Town Council is the sole Data Controller for its meeting minutes.	<p>Parish residents.</p> <p>Members of the public.</p> <p>Councillors and Officers mentioned in the record.</p>	<p>Article 6(1)(e) – Public task.</p> <p>The Town Council is legally required to create and publish minutes as part of its statutory functions under the Local Government Act 1972 and the Transparency Code.</p>	<p>Normally not applicable.</p> <p>If an individual voluntarily discloses special category data during a public meeting, processing is permitted under:</p> <p>Article 9(2)(g) – Substantial public interest, and DPA 2018, Schedule 1, Paragraph 6 – Statutory and governmental purposes.</p> <p>The Town Council should avoid recording unnecessary special category data unless legally required for the decision.</p>
Planning Applications	<p>The Town Council is a statutory consultee for all planning applications submitted to East Suffolk Council (the Local Planning Authority).</p> <p>The Town Clerk, or another designated Officer, receives notification of applications via the East Suffolk Council planning portal and circulates application details to the Planning and Development Control Committee. The application address is included on published agendas and</p>	Names and contact details of planning applicants and agents.	None. The Town Council acts as an independent Data Controller for information it receives and processes as part of its statutory consultee function.	<p>Officers and members of the Council named in agendas and minutes.</p> <p>Planning applicants and agents.</p> <p>Members of the public submitting comments or speaking at meetings.</p>	<p>Article 6(1)(c) – Compliance with a legal obligation.</p> <p>Processing is required for the Town Council to fulfil its statutory duty as a consultee under the Town and Country Planning Act 1990.</p>	<p>Normally not applicable, as the Town Council does not routinely process special category data for planning matters.</p> <p>However, if an individual voluntarily discloses such data in a public meeting or written representation, processing is permitted under:</p> <p>Article 9(2)(g) – Substantial public interest, specifically the function of a democratic body, and Schedule 1, Part 2, Paragraph 6 of the Data</p>



	<p>minutes.</p> <p>Applications are discussed at public meetings, and minutes (including decisions) are published on the Council website and shared with all Town Councillors.</p>					Protection Act 2018 (statutory and governmental purposes).
Statutory Consultations – Neighbourhood Planning and Other Legislative Consultations	To receive representations during formal consultations, publish responses where required by law, summarise issues, and submit materials for examination.	<p>Names</p> <p>Postal Addresses</p> <p>Email addresses</p> <p>Representations submitted</p>	<p>East Suffolk Council acts as an independent Data Controller for Regulation 16 representations and for its statutory planning functions.</p> <p>Neighbourhood planning consultants engaged by the Town Council (e.g., planning consultants, AECOM technical support, engagement specialists) act as Data Processors, where they handle consultation responses, draft summaries, prepare reports, or manage survey platforms on behalf of the Town Council. They process personal data only under the Town Council’s instruction.</p>	<p>Residents</p> <p>Businesses</p> <p>Statutory consultees</p> <p>Other stakeholders participating in consultations</p>	<p>Article 6(1)(c) – Legal obligation. Required under planning legislation.</p> <p>Article 6(1)(e) – Public task. Preparation of neighbourhood plan.</p>	<p>Not routinely collected. If individuals voluntarily disclose such data in representations, processing is permitted under:</p> <p>Article 9(2)(g) – Substantial public interest, supported by DPA 2018 Schedule 1, Paragraph 6</p>
Councillors	To enable elected members to carry out their democratic functions, including receiving meeting papers, fulfilling statutory responsibilities, communicating with residents, participating in committees,	<p>Name</p> <p>Home address</p> <p>Email address</p>	The Town Council is the sole Data Controller for councillor information that it holds and publishes.	Elected and co-opted members of the Town Council.	<p>Article 6(1)(c) – Legal obligation. Processing is necessary for compliance with statutory duties, including:</p>	<p>Not applicable. The Town Council does not routinely collect or require special category data from councillors.</p>



	<p>and complying with transparency and governance requirements. Processing also supports publication of required information under the Localism Act 2011 and the Transparency Code.</p>	<p>Telephone number(s)</p> <p>Register of Interests (disclosable pecuniary and other registrable interests)</p> <p>Images/photographs published on the website or for publicity</p> <p>Attendance records, declarations, and voting at meetings</p>			<p>Publication of Register of Interests</p> <p>Public access to councillor contact details</p> <p>Issuing agendas, reports and meeting papers</p> <p>Transparency Code requirements Democratic accountability</p> <p>Article 6(1)(e) – Public task. Processing is necessary for councillors to fulfil their public functions and represent the community, including correspondence, meeting attendance, and decision-making.</p> <p>Article 6(1)(a) – Consent (limited use). Used only for optional activities, such as publication of photographs or biographical information beyond what is legally required.</p>	<p>If a councillor voluntarily discloses such data (e.g. disability-related adjustments), processing may occur under: Article 9(2)(a) – Explicit consent, where the councillor has clearly and voluntarily provided the information for a specific purpose.</p>
Electoral Roll	<p>Used by the Town Clerk for reference during elections, by-elections, co-options, casual vacancies and for verifying eligibility for correspondence, petitions, parish meetings, tenancy applications (e.g., allotments), or other matters</p>	<p>Names, addresses and electoral number of parish residents.</p>	<p>None. East Suffolk Council is the Data Controller for the Electoral Register. The Town Council is a separate Data Controller for its permitted use of the</p>	<p>Parish residents listed on the Electoral Register.</p>	<p>Article 6(1)(c) – Compliance with a legal obligation.</p> <p>Processing is necessary for the Town Council to carry out its statutory functions relating to:</p>	<p>Not applicable. No special category data is processed.</p>



	<p>where residency within the parish must be established.</p> <p>Provided electronically on an annual basis by East Suffolk Council as the Electoral Registration Authority, with updates as required (e.g., monthly revisions).</p>		data under electoral legislation.		<p>Elections and co-options.</p> <p>Verifying residency for lawful Town Council processes.</p> <p>Managing casual vacancies under the Local Government Act 1972.</p>	
Freedom of Information Requests and Subject Access Requests	To process statutory information requests, respond within legal deadlines, verify identity where necessary, and maintain records for audit and legal compliance.	<p>Name</p> <p>Contact details</p> <p>Identity documents (for SARs only)</p> <p>Details of the request</p>	None.	<p>Members of the public</p> <p>Legal representatives submitting requests</p>	Article 6(1)(c) – Legal obligation. FOIA 2000, UK GDPR, DPA 2018.	If special category data is disclosed within a request: Article 9(2)(g) – Substantial public interest (statutory purpose).
Complaints Handling/Code of Conduct Complaints	To administer complaints from residents, manage investigations, liaise with Monitoring Officers (for councillor conduct complaints), and maintain records of outcomes.	<p>Names and contact details</p> <p>Nature of complaint</p> <p>Evidence provided</p> <p>Responses and outcomes</p>	For councillor Code of Conduct complaints: East Suffolk Council Monitoring Officer is an independent data controller.	<p>Complainants</p> <p>Individuals complained about</p> <p>Witnesses</p>	<p>Article 6(1)(e) – Public task. Administration of complaints and standards.</p> <p>Article 6(1)(c) – Legal obligation. Compliance with statutory standards frameworks.</p>	If special category data appears: Article 9(2)(g) – Substantial public interest (statutory complaints handling).
Safeguarding Records	To record safeguarding concerns, manage disclosures, liaise with safeguarding authorities, implement protective measures, and maintain statutory records.	<p>Names and contact details</p> <p>Details of disclosure or concern</p> <p>Witness statements</p> <p>Internal assessment notes</p> <p>Records of actions taken</p>	None – but statutory safeguarding authorities become independent controllers once information is shared.	<p>Children</p> <p>Parents/carers</p> <p>Adults at risk</p> <p>Volunteers and Officers involved</p>	<p>Article 6(1)(c) – Legal obligation. Safeguarding duties.</p> <p>Article 6(1)(e) – Public task. Protection of the public.</p>	Article 9(2)(g) – Substantial public interest, safeguarding of children/vulnerable adults.
Charitable Trust Governance and Administration	To administer the Trusts, maintain governance records, hold meetings, issue papers, manage financial records, process licences and hires, and fulfil legal obligations as Sole Trustee.	<p>Names and contact details of licensees</p> <p>Committee/Trust meeting minutes (may include personal data)</p>	None – the Town Council acts as Sole Trustee.	<p>Licensees and hirers</p> <p>Members of the public raising Trust-related queries</p>	<p>Article 6(1)(c) – Legal obligation. Charity law and financial duties.</p> <p>Article 6(1)(e) – Public task. Management of</p>	Not applicable unless health or other special data is disclosed – then Article 9(2)(a) – Explicit consent.



		Financial transaction records Correspondence relating to Trust business		Councillors acting as Trustees	charitable assets for community benefit. Article 6(1)(b) – Contract. Licence agreements.	
Community Engagement						
Subject	Purpose of processing	Categories of Personal Data	Joint Controllers	Categories of Individuals	Article 6 lawful basis for processing	Article 9 condition for processing special category data
Queries and information received from parish residents or from other parties	Correspondence from members of the public, parish residents and other parties. Data is provided directly by parish residents through surveys, online forms, written submissions, public meetings, or engagement events.	Names, address and contact details.	None. The Town Council is the Data Controller for consultation responses it collects.	Members of the public and parish residents.	Article 6(1)(e) – Public task. Processing is necessary for the Town Council to perform its public functions, including engaging with residents to shape decisions, plans and services. Where optional contact details are collected for follow-up, the lawful basis for storing those may be Article 6(1)(a) – Consent, but the consultation itself does not rely on consent.	Not normally applicable. If residents voluntarily disclose special category data in comments, processing is permitted under: Article 9(2)(g) – Substantial public interest, and DPA 2018, Schedule 1, Paragraph 6 – Statutory and government purposes.
Volunteers	To coordinate and manage parish volunteers supporting Town Council projects, events and activities; to communicate relevant information; to ensure health, safety and safeguarding requirements are met; and to maintain records of participation. Data is provided directly by volunteers or, in the case of volunteers under 18, by their	Names and email addresses. Telephone numbers (where provided). Emergency contact details (where collected). Any relevant information for risk assessments or safeguarding (if applicable).	None. The Town Council acts as the Data Controller for volunteer information.	Parish residents volunteering with the Council. Other local volunteers involved in Town Council-led projects. Volunteers under 18 participating in supervised activities (e.g. teenage grotto elves).	Article 6(1)(e) – Public task. Processing is necessary for the Town Council to carry out its public functions, including community engagement, events, stewardship of public spaces, and delivery of parish services.	Normally not applicable. If a volunteer discloses health information for risk assessment or safety reasons, processing is permitted under: Article 9(2)(b) – Employment/social protection obligations (health and safety), or Article 9(2)(g) and DPA 2018 Schedule 1, Paragraph 6 – Substantial



	parent or guardian where required.	Parent/guardian contact details for volunteers under 18			Consent may be used only for optional communication, e.g. subscribing to a mailing list. Article 6(1)(a) – Consent (limited use). Used only for optional activities, such as publication of photographs or biographical information beyond what is legally required.	public interest (statutory and government purposes). Volunteers under 18 are supervised at all times during activities, and any safeguarding data is handled in accordance with statutory guidance and the Town Council’s safeguarding policies.
Correspondence	To communicate on matters relating to Town Council business, including responding to enquiries, providing information, requesting actions, and carrying out statutory or public functions on behalf of the Town Council. Data is provided directly by individuals. Also obtained from the Electoral Roll (where lawful and applicable), Councillors’ or officers’ pre-existing contacts where shared with consent, and publicly available sources (e.g. websites).	Names, postal addresses, email addresses and telephone numbers. Sourced from Councillors’ knowledge, electoral roll and internet.	None. The Town Council is the sole Data Controller.	Members of the public. Contractors and service providers. Representatives of partner organisations.	Article 6(1)(e) – Public task: Processing is necessary for the performance of the Town Council’s statutory functions and duties. Article 6(1)(c) – Legal obligation: Some correspondence is required to comply with law (e.g. statutory notices, consultation duties, responses under planning law). Article 6(1)(a) – Consent: Where individuals explicitly request updates or provide details for communication not covered by statutory duties.	Not normally processed. If individuals voluntarily provide special category data in their correspondence, it is processed under: Article 9(2)(g) – Substantial public interest, and DPA 2018 Schedule 1, Paragraph 6 – Statutory and governmental purposes. The Town Council does not request special category data and discourages its inclusion.
Community Consultations and Surveys	To gather, analyse and record the views of parish residents and stakeholders in order to inform Town Council decisions, strategic planning, policy	Names (where provided voluntarily)	The Town Council is the sole Data Controller for consultation and survey data it collects.	Parish residents Users of Council services	Article 6(1)(e) – Public Task. Processing is necessary for the Town Council to perform its public	The Council does not request special category data. If individuals voluntarily disclose such information in their responses (e.g., health,



	development, service improvement, project design and statutory consultations. Processing includes issuing surveys, collecting responses, analysing feedback, reporting aggregated results, and retaining evidence for governance, audit and funding purposes.	Postal address or postcode (for geographic verification) Email address or telephone number (only if supplied for follow-up contact) Written comments, opinions or qualitative feedback Demographic or contextual information (only if voluntarily given)	If a third-party survey platform (e.g. SurveyMonkey, Microsoft Forms) is used, it operates as a Data Processor under contract.	Local businesses and organisations Stakeholders participating in community engagement exercises	functions, including community engagement, statutory consultations, and evidence-based decision-making. Article 6(1)(a) – Consent (limited use). Used only where individuals voluntarily provide contact details for follow-up, or opt in to receive updates on the consultation. Consent may be withdrawn at any time.	disability, ethnicity), processing is permitted under: Article 9(2)(g) – Substantial public interest, supported by DPA 2018 Schedule 1, Paragraph 6 (statutory/public functions). The Town Council will avoid capturing unnecessary special category data and will redact it where not required.
Social Media Interactions	To communicate Town Council news, promote events, engage with residents, respond to enquiries, publish statutory consultations, and moderate comments. Social media interactions may include responding to messages, managing comments, or recording/reporting inappropriate content.	Username/profile names Comments and messages Images or video included in posts, tags or comments Public reactions (likes, shares) Any information voluntarily disclosed by individuals in comments or messages	The Town Council and the social media platform (e.g. Meta) are Joint Controllers for data visible on the page. Meta controls platform-wide processing; the Town Council controls moderation and communication.	Residents interacting with Council social media Members of the public messaging or commenting Volunteers and businesses tagged in posts Councillors or Officers appearing in posts	Article 6(1)(e) – Public task: Processing is necessary to perform the Council’s public communication and community engagement duties. Article 6(1)(a) – Consent: Used for publishing images of identifiable individuals (especially children) where required. Article 6(1)(f) – Legitimate interests: Used for page moderation and removal of inappropriate content.	Not normally applicable. If users voluntarily disclose special category data, it is processed under: Article 9(2)(g) – Substantial public interest, only as needed to address or moderate the content.
Website Analytics, Cookies and Server Logs	To maintain the secure and effective operation of the Town Council’s website, monitor performance, analyse usage to improve accessibility and user experience, and ensure system security.	IP addresses Device and browser information Pages visited and time spent	The Town Council is the Data Controller for information collected via its website. The website hosting provider acts as a Data	Visitors to the website Residents submitting contact forms	Article 6(1)(e) – Public task: Maintaining a public website is necessary for the Council’s statutory requirement to provide information and ensure transparency.	Not normally applicable. If a contact form inadvertently includes special category data, it is processed under: Article 9(2)(g) – Substantial public interest, limited to



	Processing includes the use of cookies, analytics tools (if enabled), and automatic server logs generated by the hosting provider.	Referrer information Cookie preferences Error logs and security logs Contact form submissions (name, email address, content)	Processor for server logs and security functions.	Users accessing online documents or information	Article 6(1)(c) – Legal obligation: Some content (e.g., minutes, agendas, transparency information) must be published by law. Article 6(1)(a) – Consent: Required for non-essential cookies (e.g. analytics) where used.	what is necessary for responding to the enquiry.
Event Ticketing	To administer bookings for Council-run events, including processing ticket applications, allocating time slots, managing attendance lists, communicating with parents/carers, coordinating safeguarding arrangements, ensuring health and safety compliance, and managing payments where applicable. Processing also supports post-event administration such as evaluating attendance and responding to enquiries.	Collected directly through booking forms or email correspondence: Name of parent or carer Name of child/children Postal address (where provided) Email address Telephone number Preferred time slot Payment details (if the event includes a fee) Any additional information voluntarily provided (e.g. accessibility needs, allergies)	The Town Council is the sole Data Controller for event ticketing. If a third-party ticketing platform is used, they act as a Data Processor under contract.	Parents and carers booking tickets Children attending the event Adult participants where events involve the general public	Article 6(1)(b) – Contract. Processing is necessary to administer the booking, allocate tickets, communicate event details, and deliver the service purchased or reserved. Article 6(1)(c) – Legal obligation. Processing is necessary to comply with health and safety requirements and safeguarding duties applicable to children’s events. Article 6(1)(e) – Public task. Processing is necessary for the Town Council to provide community events and activities as part of its public functions. Article 6(1)(a) – Consent (limited use). Used only where images or optional information are provided voluntarily for publicity purposes. Consent is not required	The Council does not request special category data as part of event bookings. If a parent or carer voluntarily discloses special category information (e.g., health, disabilities, allergies) relevant to safe participation, processing will occur under: Article 9(2)(a) – Explicit consent, provided specifically for that purpose.



					for ticketing administration.	
Event Photography and Videography	<p>To record and publicise Town Council events, promote community engagement, evidence delivery of activities, support future funding applications and reports, and maintain an historical record of civic life.</p> <p>Images and video may be used on the Town Council's website, social media, printed materials, press releases, and in internal reports.</p> <p>Where photography and videography includes identifiable individuals, the Town Council must ensure that use is fair, lawful, and transparent.</p>	<p>Photographs and video of adults</p> <p>Photographs and video of children (only with consent from parent/carer)</p> <p>Audio captured incidentally in video recordings</p> <p>Names only where individuals are identified for publicity (e.g., winners, performers)</p>	<p>The Town Council is the sole Data Controller. If a contracted photographer or videographer is used, they act as a Data Processor under a written agreement, processing imagery on behalf of the Town Council.</p>	<p>Adults attending events</p> <p>Children attending events (with parental consent for identifiable images)</p> <p>Performers, volunteers and stallholders</p> <p>Officers and councillors attending events</p>	<p>Article 6(1)(e) – Public task. The Town Council may take general, non-intrusive photographs of events as part of its public functions to promote community participation and local initiatives.</p> <p>Article 6(1)(a) – Consent. Required for:</p> <p>Identifiable images of children</p> <p>Close-up or posed photographs of adults used in publicity</p> <p>Any situation where an individual would reasonably expect a choice</p> <p>Consent must be explicit, informed, and recorded.</p> <p>Article 6(1)(f) – Legitimate interests (limited use). May apply for general crowd shots where individuals are not the focus and reasonable expectations are met. Not used for children.</p>	<p>Not applicable unless an image reveals special category data (e.g. disability, religious belief, health condition). If this occurs, processing is based on: Article 9(2)(a) – Explicit consent.</p>
Competition Entries	To administer Town Council-run competitions, including receiving entries, communicating with	<p>Names of entrants</p> <p>Contact details (email, telephone number, postal</p>	<p>The Town Council is the sole Data Controller. Where a partner organisation assists in</p>	<p>Adult competition entrants</p> <p>Children competition</p>	<p>Article 6(1)(b) – Contract (performance of a task requested by the entrant).</p>	<p>Not generally applicable unless:</p>



	<p>participants, selecting winners, publishing results, awarding prizes, and promoting community engagement.</p> <p>Personal data may also be used to publicise winning entries (with consent where required) and to evaluate participation for future event planning.</p>	<p>address)</p> <p>Age of entrant (where relevant for eligibility categories)</p> <p>Competition submission (e.g., artwork, photograph, written entry) – may include personal data if identifiable</p> <p>Parent/carer contact details for child entrants</p> <p>Images of winners (only with appropriate consent)</p>	<p>judging or prize-giving, they act as an independent data controller for their own processing, but do not receive personal data from the Town Council unless necessary and proportionate.</p>	<p>entrants (with parental consent)</p> <p>Parents/carers of child entrants</p> <p>Judges (names may be published in promotional materials)</p>	<p>Processing is necessary to run the competition, including communicating with entrants and awarding prizes.</p> <p>Article 6(1)(a) – Consent. Required for: Publishing the names or images of winners (especially children) Using entries (e.g. photos, artwork) in publicity or on social media Consent must be explicit and recorded.</p> <p>Article 6(1)(e) – Public task. May apply where the competition forms part of the Town Council’s engagement activity or statutory community role. Used cautiously and not as a substitute for consent.</p>	<p>An entry or photograph reveals special category information (e.g. health, religious belief). If so, processing will rely on: Article 9(2)(a) – Explicit consent.</p>
Mailing Lists and Newsletters	<p>To send community updates, consultation information, event notices and other communications to individuals who have opted in to receive such information from the Town Council.</p> <p>Individuals may opt out at any time.</p>	<p>Name (where provided)</p> <p>Email address</p> <p>Postal address (only if provided voluntarily for postal updates)</p>	<p>None. Email distribution software (e.g. Mailchimp or other providers) acts as a Data Processor under contract.</p>	<p>Residents</p> <p>Local organisations</p> <p>Other individuals who have explicitly opted in to receive Town Council communications</p>	<p>Article 6 lawful basis for processing Article 6(1)(a) – Consent. Individuals opt in voluntarily and may withdraw consent at any time by contacting the Town Council or using an unsubscribe link (where available).</p>	<p>Not applicable – no special category data is collected for this purpose.</p>
Media Outlets	<p>To issue press releases, statements, event information, public notices and other authorised communications on behalf of the Town Council to</p>	<p>Names of journalists, editors or media contacts</p> <p>Email addresses</p>	<p>None. The Town Council is the sole Data Controller.</p>	<p>Journalists</p> <p>Editors</p>	<p>Article 6(1)(e) – Public Task. Processing is necessary for the Town Council to perform its public</p>	<p>The Town Council does not collect or process special category data for media contacts.</p>



	<p>local, regional and national media outlets.</p> <p>Processing supports transparency, public awareness, emergency communications and community engagement.</p> <p>Contact details are stored to enable efficient distribution of future press releases and media responses.</p>	<p>Telephone numbers</p> <p>Media outlet/organisation details</p> <p>Any correspondence received in reply</p>		<p>Press officers</p> <p>Media representatives from print, online, radio or television outlets</p>	<p>functions, including transparency, public information duties and community engagement .</p> <p>Article 6(1)(a) – Consent (limited use). Where individuals request to be added to a press distribution list that is not already publicly available; consent can be withdrawn at any time.</p>	<p>Any unsolicited disclosure would be processed under: Article 9(2)(g) – Substantial public interest, limited to what is necessary for lawful communications.</p>
Local Businesses	<p>To maintain a directory of local businesses for the purpose of economic development, community engagement, promoting local services, issuing consultation invitations, distributing relevant updates, supporting the visitor economy strategy, coordinating town centre initiatives, and facilitating communication regarding events, market opportunities, town projects, or emergencies affecting business operations.</p> <p>The directory is also used to support partnership work with East Suffolk Council and other agencies on business-related programmes.</p>	<p>Name of business owner or primary contact</p> <p>Business name</p> <p>Business address</p> <p>Email address and telephone number</p> <p>Website or social media links (if provided)</p> <p>Nature of business and service type</p> <p>Any correspondence exchanged with the business</p>	<p>The Town Council is the sole Data Controller for the business contact directory.</p> <p>If contact information is added from publicly available sources, the Town Council remains the Controller for its use.</p>	<p>Local business owners</p> <p>Managers and staff acting as business representatives</p> <p>Sole traders and self-employed individuals</p> <p>Market stallholders who operate within the town (where applicable)</p>	<p>Article 6(1)(e) – Public Task. Processing is necessary for the Town Council to perform functions supporting the local economy, town centre vitality, business engagement and statutory consultation duties.</p> <p>Article 6(1)(f) – Legitimate Interests. May apply for non-statutory communication where the Town Council has a reasonable interest in engaging local businesses (e.g., event opportunities, emergency updates) and where rights and freedoms are not overridden.</p> <p>Article 6(1)(a) – Consent (limited use). Used where businesses opt in to receive newsletters or</p>	<p>The Town Council does not request or process special category data for the business database. If any special category data is disclosed voluntarily (e.g., health-related accessibility notes for market participation), processing will rely on: Article 9(2)(a) – Explicit consent, for that specific purpose only.</p>



					promotional communications not covered by public task.	
Grant Applications	To administer the Town Council's Community Grants scheme, including assessing applications, determining eligibility and compliance with the Grants Policy, contacting applicants for further information, issuing grant agreements, processing payments, monitoring project delivery, and publishing required transparency information.	<p>Collected directly from the grant application form and supporting documents:</p> <p>Name of applicant (individual or organisational contact)</p> <p>Postal address</p> <p>Email address</p> <p>Telephone number</p> <p>Position within organisation</p> <p>Bank account details for grant payment</p> <p>Information about the organisation and proposed project</p> <p>Photographs or promotional material (if voluntarily provided for publicity purposes)</p>	None. The Town Council is the sole Data Controller for grant application data.	<p>Individuals applying for a community grant.</p> <p>Contact persons for community groups, charities, or organisations submitting applications</p>	<p>Article 6(1)(b) – Contract. Processing is necessary to enter into and administer a grant agreement, including assessing the application, making payment, and monitoring use of funds.</p> <p>Article 6(1)(c) – Legal obligation. Processing is required to comply with financial and audit requirements, including publication of expenditure under the Transparency Code and retention of financial records.</p> <p>Article 6(1)(e) – Public task. Processing is necessary for the Town Council to deliver its community funding functions and support local groups as part of its public role.</p> <p>Article 6(1)(a) – Consent (limited use). Used only where applicants voluntarily provide photographs or publicity material for optional promotional purposes.</p>	<p>The Town Council does not request special category data as part of the grant application process. If an applicant voluntarily includes such information (e.g., health-related information relevant to the project), processing will only occur with:</p> <p>Article 9(2)(a) – Explicit consent, provided for that specific purpose.</p>

Service Delivery



Subject	Purpose of processing	Categories of Personal Data	Joint Controllers	Categories of Individuals	Article 6 lawful basis for processing	Article 9 condition for processing special category data
Markets	To administer the Town Council's weekly and monthly markets, including trader registration, stall allocation, invoicing, compliance with market regulations, and ensuring health, safety and insurance requirements are met.	<p>Collected directly from traders via the signed market regulations and associated forms:</p> <ul style="list-style-type: none"> Name and trading name Postal address Email address and telephone number Description of goods sold Vehicle registration number (where applicable) Public liability insurance details Payment and invoicing information 	None. The Town Council is the sole Data Controller. Any third-party payment processor or booking system acts only as a Data Processor on behalf of the Town Council.	Market traders participating in the weekly and monthly markets.	<p>Article 6(1)(b) – Contract. Processing is necessary to enter into and perform the trader agreement (Market Regulations), including stall allocation, invoicing, and compliance checks.</p> <p>Article 6(1)(c) – Legal obligation. Processing is required to comply with legal duties relating to health and safety, financial accounting, and insurance validation.</p> <p>Article 6(1)(e) – Public task. Processing is necessary for the Town Council to deliver and manage markets as part of its public functions supporting the local economy and community.</p>	<p>Not applicable. The Town Council does not request or require special category data for market administration.</p> <p>If a trader voluntarily discloses such information (e.g., health or accessibility needs), processing is permitted under: Article 9(2)(a) – Explicit consent, as the trader has provided the information voluntarily for a specific purpose.</p>
Market Hall Hire	To administer bookings for the Market Hall including processing booking requests, issuing hire agreements, managing invoices and payments, coordinating access, ensuring compliance with the Terms and Conditions of Hire, and maintaining necessary records for audit and insurance purposes.	<p>Collected directly from the hire form or email correspondence:</p> <ul style="list-style-type: none"> Name of hirer or organisation representative Postal address Email address Telephone number Purpose of hire and event 	None. The Town Council is the sole Data Controller for all hall hire information.	<p>Individual hirers</p> <p>Representatives of community groups, charities, clubs or commercial organisations</p> <p>Event organisers</p>	<p>Article 6(1)(b) – Contract. Processing is necessary to enter into and deliver the hire agreement, including issuing invoices, managing access, and ensuring compliance with Terms and Conditions of Hire.</p> <p>Article 6(1)(c) – Legal obligation. Processing is necessary for compliance with</p>	<p>The Town Council does not require special category data as part of the venue hire process.</p> <p>If a hirer voluntarily provides such information (e.g., health or accessibility needs relevant to safe use of the venue), processing is based on: Article 9(2)(a) – Explicit consent, for that specific purpose</p>



		<p>details</p> <p>Payment and invoicing information</p> <p>Any additional information voluntarily provided to support hire arrangements (e.g. accessibility needs)</p>			<p>financial and audit requirements, insurance obligations, and health and safety duties.</p> <p>Article 6(1)(e) – Public task. Processing is necessary for the Town Council to deliver community facilities and make public venues available in accordance with its statutory and community functions.</p> <p>Article 6(1)(a) – Consent (limited use). Used only where optional information is provided voluntarily for publicity or promotional purposes (e.g. photos)</p>	
Market Hall CCTV	To maintain the security of the Market Hall, protect Council property, deter and detect crime, ensure the safety of staff, hirers and visitors, and assist in the investigation of incidents. CCTV footage may be shared with law enforcement authorities where required.	<p>Video images of individuals entering, leaving or moving within the CCTV coverage area.</p> <p>Audio recordings of conversations or sounds occurring within range of the microphones.</p> <p>Date and time of recordings.</p> <p>Vehicle images (if captured).</p>	The Town Council, acting as sole Trustee for the Market Hall, is the sole Data Controller for CCTV footage.	<p>Officer</p> <p>Councillors</p> <p>Hirers and their attendees</p> <p>Visitors and members of the public</p> <p>Contractors</p>	<p>Article 6(1)(e) – Public task. Processing is necessary for the Town Council to carry out its public functions, including ensuring the security and proper use of public assets, protecting individuals using the premises, and assisting with crime prevention.</p> <p>Article 6(1)(f) – Legitimate interests. Processing is necessary for the legitimate interests of the Town Council in protecting its buildings, equipment and</p>	<p>The Town Council does not intend to capture special category data through CCTV.</p> <p>If special category data is incidentally captured (e.g. disability-related visible information), processing is permitted under: Article 9(2)(g) – Substantial public interest, for crime prevention and safeguarding purposes, as supported by Schedule 1, Part 2 of the DPA 2018.</p>



					users, except where those interests are overridden by the rights and freedoms of individuals.	
Gannon Institute Licensees	To administer licence agreements for use of the Gannon Rooms, including processing applications, issuing and managing licences, arranging access, ensuring compliance with the terms of hire, invoicing and payment, and maintaining necessary records for audit, insurance and governance purposes.	<p>Collected directly from licence applicants:</p> <p>Name of licensee or authorised representative</p> <p>Postal address</p> <p>Email address</p> <p>Telephone number</p> <p>Purpose and duration of the licence</p> <p>Insurance details (where applicable)</p> <p>Payment and invoicing information</p> <p>Any additional information voluntarily provided to support safe or compliant use of the building</p>	The Town Council, acting as Sole Trustee of the Gannon Institute Trust, is the sole Data Controller for licence information.	<p>Individuals or representatives of organisations entering into a licence agreement</p> <p>Event organisers using the premises under a licence</p> <p>Other named contacts associated with the licence</p>	<p>Article 6(1)(b) – Contract. Processing is necessary to enter into and perform the licence agreement, including managing access, invoicing, communication and compliance with licence terms.</p> <p>Article 6(1)(c) – Legal obligation. Processing is required for compliance with financial regulations, insurance obligations, health and safety duties, and statutory reporting associated with the Town Council’s role as Sole Trustee.</p> <p>Article 6(1)(e) – Public task. Processing is necessary for the Town Council to manage community assets held in trust and make facilities available for public and community use.</p> <p>Article 6(1)(a) – Consent (limited use). Used only where individuals voluntarily provide information for optional purposes, such as publicity or promotional material.</p>	The Council does not request special category data as part of licence administration. If a licensee voluntarily provides such data (e.g. accessibility or health information relevant to safe use of the premises), processing will only occur under: Article 9(2)(a) – Explicit consent, for that specific purpose.



Allotment Tenants	To manage allotment plots, issue tenancy agreements, maintain waiting lists, arrange inspections, communicate with tenants, and manage invoicing and payments.	Name Address Email address Telephone number Plot number Payment records	None.	Allotment tenants Applicants on the waiting list	Article 6(1)(b) – Contract. Tenancy agreements. Article 6(1)(c) – Legal obligation. Financial and audit requirements. Article 6(1)(e) – Public task. Management of community allotments.	Not applicable unless health data is voluntarily disclosed for accessibility needs – then Article 9(2)(a) – Explicit consent.
Administration and Finance						
Subject	Purpose of processing	Categories of Personal Data	Joint Controllers	Categories of Individuals	Article 6 lawful basis for processing	Article 9 condition for processing special category data
Employees	To administer employment, including recruitment, payroll, pensions, performance management, statutory reporting, training, leave, sickness management, and compliance with employment and health and safety legislation. Administration of employee salaries, statutory deductions, and pension contributions. Payroll is processed by the Suffolk Association of Local Councils (SALC) as a Data Processor on behalf of the Town Council. Data is provided directly by employees and job applicants, and Occupational Health providers (where applicable), and HMRC, pension providers and other statutory bodies	Names Postal addresses Email addresses Telephone numbers Dates of birth National Insurance numbers Employment history Education, skills and qualifications Salary and bank details Performance records Attendance and leave records Special category data: Sickness and medical information (where required for	None. The Town Council is the sole Data Controller.	Current employees. Former employees (where records retention is required). Job applicants.	Article 6(1)(b) – Contractual necessity: Processing required to enter into and perform employment contracts. Article 6(1)(c) – Legal obligation: Processing required to comply with employment law, tax law, pensions law, health and safety legislation, etc. Article 6(1)(e) – Public task: Some functions carried out as part of the Council’s statutory duties. Article 6(1)(a) – Consent (limited use). Used only for optional activities, such as publication of photographs or biographical information beyond what is legally required.	Article 9(2)(b) – Employment and social protection law, supported by DPA 2018 Schedule 1, Part 1, Paragraph 1 (necessary for employment law obligations). Article 9(2)(h) – Provision of health or social care (where OH reports are processed).



		<p>statutory or employment purposes).</p> <p>Equal opportunities monitoring data (where collected).</p> <p>Health information necessary for statutory sick pay, health and safety, risk assessments, and occupational health referrals.</p> <p>Images/photographs published on the website or for publicity.</p>				
Contractors, Suppliers and Service Providers	To procure goods and services, maintain contracts, manage invoicing and payments, ensure compliance with procurement rules, and maintain audit records.	<p>Name of company representative</p> <p>Business contact details</p> <p>Email address and telephone number</p> <p>Bank account information (for payments)</p>	None.	<p>Contractors and consultants</p> <p>Sole traders</p> <p>Supplier representatives</p>	<p>Article 6(1)(b) – Contract. Needed to procure and pay for services.</p> <p>Article 6(1)(c) – Legal obligation. Required for financial reporting and audit.</p>	Not applicable — no special category data processed.
Insurance Claims	To assess incidents, notify insurers, manage claims, liaise with claimants, and retain records for statutory periods.	<p>Names and contact details</p> <p>Incident details</p> <p>Injury details (may include health data)</p> <p>Witness information</p> <p>Photographs/ videography</p> <p>Correspondence</p>	Town Council insurance provider acts as an independent controller.	<p>Claimants</p> <p>Witnesses</p> <p>Insurers</p> <p>Injured parties</p>	<p>Article 6(1)(c) – Legal obligation. Required under insurance and audit law.</p> <p>Article 6(1)(e) – Public task. Managing public safety and statutory claims.</p>	<p>For injury or medical information:</p> <p>Article 9(2)(f) – Legal claims.</p>
Procurement, Tenders and Request for Quotations	To obtain quotations, evaluate tenders, appoint suppliers, manage public procurement obligations, and retain records for audit and transparency.	<p>Names of bidders</p> <p>Business contact details</p>	None.	<p>Contractors and consultants</p> <p>Business owners</p>	<p>Article 6(1)(b) – Contract. Required to enter into service agreements.</p> <p>Article 6(1)(c) – Legal</p>	Not applicable unless special category data appears — then Article 9(2)(a) – Explicit consent.



		<p>Email addresses and phone numbers</p> <p>CVs or qualifications (if supplied)</p> <p>Pricing and tender documentation</p>		Sole traders	obligation. Public procurement rules and audit.	
Information Exchanged with Other Local Authorities	<p>To carry out the Town Council's statutory and public functions through collaboration with principal authorities.</p> <p>This includes resolving resident enquiries, reporting defects or hazards, coordinating Highways matters, participating in planning processes, handling safeguarding referrals, exchanging information relating to public realm, environmental health, elections, community safety, and responding to statutory consultations.</p>	<p>Names and contact details of residents</p> <p>Postal addresses</p> <p>Details of service requests, complaints or casework</p> <p>Correspondence relating to individual issues</p> <p>Information relevant to safeguarding (where applicable)</p> <p>Images/video where CCTV or photographs are shared in relation to incidents</p> <p>Any data necessary for the principal authority to fulfil its statutory responsibilities</p>	<p>None in most cases. Each authority acts as an independent Data Controller for the information it receives.</p> <p>Where a specific statutory scheme creates joint controllership (e.g., certain safeguarding pathways), this is governed by the legislation and handled through established protocols.</p>	<p>Parish residents</p> <p>Complainants or service requestors</p> <p>Individuals involved in incidents or enquiries</p> <p>Volunteers or contractors where relevant to the issue reported</p>	<p>Article 6(1)(e) – Public task. Processing is necessary for the performance of the Town Council's public functions and for cooperation with SCC and ESC in delivering statutory services.</p> <p>Article 6(1)(c) – Legal obligation. Applies where the Town Council must share information to comply with law (e.g. safeguarding, planning procedures, statutory notices).</p> <p>Article 6(1)(a) – Consent (limited use). Used only where a resident explicitly requests referral or contact sharing beyond statutory duties.</p>	<p>Not routinely processed. Where safeguarding, health or other special category data is shared under statutory obligations:</p> <p>Article 9(2)(g) – Substantial public interest, supported by DPA 2018 Schedule 1, Part 2 (safeguarding and statutory functions).</p> <p>Where an individual voluntarily provides special category information for referral: Article 9(2)(a) – Explicit consent.</p>
IT Providers, Cloud Storage, Email Hosting and Technical Support	To provide secure email services, document storage, backup, software support, cybersecurity monitoring, and IT maintenance for the Town Council.	<p>Email content and metadata</p> <p>Names, job titles and contact details</p> <p>Documents stored in cloud</p>	<p>The Town Council is the Data Controller.</p> <p>IT service providers, cloud platforms (e.g. Microsoft), and website support contractors act</p>	<p>Councillors</p> <p>Employees</p> <p>Residents included in correspondence or</p>	<p>Article 6(1)(c) – Legal obligation: Ensuring secure systems, backups, and data protection compliance.</p> <p>Article 6(1)(e) – Public</p>	<p>If processors access special category data as part of support work, processing occurs under: Article 9(2)(b) – Employment/social protection, or</p>



	This includes processing carried out by Microsoft 365, email hosting providers, website maintenance contractors, and IT support providers acting on behalf of the Town Council.	platforms System access logs Backup files Data contained in documents accessed during technical support	as Data Processors under contract.	documents Contractors and partner organisations	task: Maintaining IT systems required for Council operations. Article 6(1)(b) – Contract: Processing may be required to fulfil support or licensing agreements.	Article 9(2)(g) – Substantial public interest, limited to what is necessary for maintaining systems.
Financial Administration and Banking Records	To administer the Town Council’s financial operations, including payments, receipts, budget monitoring, audit trails, bank reconciliation, financial reporting, and compliance with statutory financial regulations. Processing includes maintaining access logs for online banking users and audit records for internal and external review.	Names of payees, suppliers, and recipients Bank account details Payment references and transaction data Invoices, receipts and remittance advice Email addresses and business contact details Councillor and officer names associated with authorisations Audit trail information (signatures, approvals, user access logs)	The Town Council is the Data Controller. Banks act as independent Data Controllers for their own processing. The Town Council uses Rialtas (RBS) financial software for accounting and financial administration. Rialtas acts as a Data Processor providing secure hosted financial management services.	Officers and councillors with financial authorisation Contractors and suppliers Grant recipients Residents receiving refunds or payments	Article 6(1)(c) – Legal obligation: Financial regulations, Local Government Act 1972, Accounts and Audit Regulations, transparency requirements. Article 6(1)(e) – Public task: Managing public funds and carrying out statutory financial duties.	Not normally applicable. Where invoices or records include health-related or other special category information inadvertently, processing is based on: Article 9(2)(g) – Substantial public interest, strictly limited to audit and compliance purposes.



SAXMUNDHAM TOWN COUNCIL

DATA BREACH POLICY

Review Body: Resources Committee

Policy Approved: Town Council

Approval Date: February 2026

Minute Item:

Review Period: Biennial

Next Review: February 2028



1. Introduction

Saxmundham Town Council is committed to protecting the personal data it processes and to complying with the requirements of the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

This Policy sets out how the Council will identify, manage, report and learn from personal data breaches in a consistent, lawful and proportionate manner.

This Policy applies to all councillors, officers, contractors, volunteers and others who process personal data on behalf of the Council.

All actual, suspected or potential data breaches, including near misses, must be reported immediately to the Town Clerk.

2. What is a Personal Data Breach

A personal data breach is a breach of security leading to the accidental or unlawful:

- destruction;
- loss;
- alteration;
- unauthorised disclosure of; or
- access to personal data.

A breach may involve confidentiality, integrity or availability of personal data and may result in harm to individuals, disruption to Council services, reputational damage, financial loss or regulatory enforcement.

Examples (non-exhaustive) include:

- personal data sent to the wrong recipient;
- loss or theft of devices, paper files or storage media containing personal data;
- unauthorised access to systems or records;
- cyber incidents such as malware or phishing attacks;
- insecure disposal of personal data;
- physical security failures resulting in unauthorised access to records.

Near misses, where a breach was narrowly avoided, must also be reported so that learning and mitigation can take place.

3. Roles and Responsibilities



Town Clerk

The Town Clerk is responsible for overseeing the management of data breaches on behalf of the Council, including:

- assessing the breach and associated risks;
- determining whether notification to the Information Commissioner's Office (ICO) and/or affected individuals is required;
- ensuring incidents are recorded, investigated and resolved; and
- ensuring lessons learned are acted upon.

Councillors, Officers, Contractors and Volunteers

All individuals processing personal data on behalf of the Council are responsible for:

- identifying and reporting suspected or actual data breaches immediately;
- cooperating with any investigation; and
- taking steps to contain and mitigate breaches where safe to do so.

4. Reporting a Data Breach

All data breaches or suspected breaches must be reported as soon as they are discovered to the Town Clerk.

Where an incident occurs outside normal working hours, it must be reported at the earliest practicable opportunity by email or telephone.

Where there is doubt as to whether an incident constitutes a breach, it must be treated as a breach and reported.

5. Incident Response and Management

The Council will follow a structured incident response process:

1. Identification and Assessment

Confirm whether a personal data breach has occurred, assess the nature and scope of the incident, and identify the categories and volume of personal data involved.

2. Containment and Mitigation

Take immediate steps to limit the impact of the breach, including securing systems, recovering data where possible, and preventing further unauthorised access or loss.

3. Risk Assessment

Assess the likelihood and severity of the risk to the rights and freedoms of affected individuals, taking account of:

- the type of data involved;
- the sensitivity of the data;
- the number of individuals affected; and



- the potential consequences of misuse.

4. Notification Decisions

The Town Clerk will determine, based on risk assessment:

- whether the breach must be reported to the ICO (within 72 hours of becoming aware of the breach, where required); and
- whether affected individuals must be informed without undue delay.

5. Recovery and Remediation

Restore systems and processes, provide appropriate support to affected individuals where necessary, and implement measures to prevent recurrence.

6. Review and Learning

All breaches and near misses will be reviewed to identify lessons learned and any required changes to policies, procedures, training or technical controls.

6. Recording and Documentation

All personal data breaches and near misses will be recorded in a data breach log, regardless of whether they are reported to the ICO.

Records will include:

- the facts relating to the breach;
- its effects; and
- remedial action taken.

7. Disciplinary and Compliance Matters

Failure to comply with this Policy may result in disciplinary action where breaches arise from deliberate, reckless or repeated non-compliance with Council policies or procedures.

Nothing in this Policy is intended to deter prompt reporting. Early reporting of mistakes or near misses is encouraged and supported.

8. Review and Monitoring

This Policy will be monitored for effectiveness and reviewed biennially, or earlier where required due to legislative change, ICO guidance or operational learning.



SAXMUNDHAM TOWN COUNCIL

DATA PROTECTION POLICY

Review Body: Resources Committee

Policy Approved: Town Council

Approval Date: February 2026

Minute Item:

Review Period: Biennial

Next Review: February 2028



1. Purpose

Saxmundham Town Council is committed to protecting the personal data it processes and to complying with the requirements of the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, the Annual Governance and Accountability Return Assertion 10: Digital and Data Compliance, and relevant guidance from the Information Commissioner's Office (ICO).

This Policy sets out the Council's approach to data protection, its legal responsibilities, and the arrangements in place to ensure personal data is processed lawfully, fairly, and securely.

2. Scope

This Policy applies to all personal data processed by the Council, whether relating to service users, staff, councillors, contractors, volunteers, or members of the public. It applies to data held in any format, including paper records and electronic systems.

3. Roles and Responsibilities

The Town Clerk is responsible for overseeing data protection compliance and advising the Council on its obligations.

Councillors, Officers, and Contractors: All individuals handling personal data on behalf of the Council are responsible for complying with this Policy.

As of 2025, parish and town councils are exempt from the legal requirement to appoint a Data Protection Officer (DPO) under Section 7 of the Data Protection Act 2018. However, the Council may appoint a DPO as good practice. If appointed, the DPO will advise on data protection obligations, monitor compliance, and act as the contact point for the ICO.

4. Data Protection Principles

The Council processes personal data in accordance with the principles of UK GDPR. Personal data shall be:

- processed lawfully, fairly and transparently;
- collected for specified, explicit and legitimate purposes;
- adequate, relevant and limited to what is necessary;
- accurate and kept up to date;
- kept no longer than necessary;
- processed securely, using appropriate technical and organisational measures.

5. Lawful Bases for Processing

The Council will only process personal data where it has a lawful basis under Article 6 of UK GDPR, most commonly:

- compliance with a legal obligation;



- performance of a task carried out in the public interest or in the exercise of official authority;
- performance of a contract;
- legitimate interests, where applicable and proportionate.

Special category personal data will only be processed in accordance with Article 9 of UK GDPR and relevant statutory conditions.

6. Individual Rights

The Council recognises and upholds the rights of individuals under UK GDPR, including the rights of access, rectification, erasure, restriction, objection, and data portability, subject to lawful exemptions.

Requests to exercise these rights will be handled in accordance with the Council's Subject Access Request Policy.

7. Records, Security and Training

The Council maintains a record of its processing activities and a personal data audit.

Appropriate security measures, staff training, and policies are in place to safeguard personal data.

8. Data Breaches

Personal data breaches will be managed in accordance with the Council's Data Breach Policy.



SAXMUNDHAM TOWN COUNCIL

DATA RETENTION AND DISPOSAL POLICY

Review Body: Resources Committee
Policy Approved: Town Council
Approval Date: February 2026
Minute Item:
Review Period: Biennial
Next Review: February 2027



1. Purpose

This Policy sets out how Saxmundham Town Council retains and disposes of records in a lawful, consistent and proportionate manner. It ensures compliance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, the Freedom of Information Act 2000, audit requirements and relevant local government legislation, while supporting effective and efficient Council operations.

The Council recognises that its records are important public assets and must be managed throughout their lifecycle, from creation through to secure disposal or permanent archiving.

2. Scope

This Policy applies to all records created, received or held by the Council in the course of carrying out its functions, regardless of format. This includes:

- Paper records
- Electronic documents and databases
- Emails and digital communications
- Images, plans and scanned records

The Policy applies to Councillors, officers, contractors and volunteers handling records on behalf of the Council.

3. Legislative and Regulatory Framework

The Council manages its records in accordance with relevant legislation and guidance, including (but not limited to):

- UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- Freedom of Information Act 2000
- Local Government Act 1972
- Limitation Act 1980
- VAT Act 1994
- Audit and Accountability legislation
- Employers' Liability (Compulsory Insurance) Regulations 1998

4. Principles of Data Retention

The Council will ensure that records are:



- Retained only for as long as they are required for legal, regulatory, operational or historical purposes
- Accurate, accessible and held in a usable format
- Protected against unauthorised access, loss or damage
- Securely disposed of when no longer required

Personal data will not be retained for longer than necessary and will be processed in line with the Council's Data Protection Policy and Privacy Notices.

5. Retention Periods

Retention periods for Council records are set out in the Records Retention Schedule, which forms an appendix to this Policy.

The Schedule identifies:

- Categories of records
- Minimum retention periods
- The legal or operational basis for retention
- The appropriate action at the end of the retention period

Where a record is required for:

- Ongoing legal proceedings
- Audit queries
- Freedom of Information or Subject Access Requests

disposal will be suspended until the matter is fully resolved.

6. Storage and Security

Records will be stored securely to prevent unauthorised access, alteration or loss.

- Paper records containing confidential or personal data will be stored in locked cabinets with restricted access.
- Electronic records will be held on secure systems with role-based access controls and password protection.
- Cloud-based systems may be used to ensure resilience and business continuity.

Electronic records, including emails, are subject to the same retention rules as paper records.

7. Disposal of Records

When records reach the end of their retention period, they will be disposed of in a secure and appropriate manner:



- Confidential paper records will be shredded or disposed of via secure waste services.
- Electronic records will be permanently deleted in accordance with IT and cyber security procedures.
- Equipment and storage media will be securely wiped or destroyed prior to disposal.

No records will be destroyed where destruction could reasonably be perceived as intended to avoid disclosure or scrutiny.

8. Archiving and Historical Records

Records of long-term historical, legal or evidential value will be retained permanently or transferred to an appropriate archive, such as The Suffolk Hold, in accordance with statutory guidance.

9. Roles and Responsibilities

- **Town Council:** Overall accountability for records management.
- **Town Clerk:** Responsible for implementing this Policy, maintaining the Records Retention Schedule and advising on retention and disposal decisions.
- **Councillors, Officers and Contractors:** Responsible for ensuring records are managed in accordance with this Policy.

Where there is uncertainty about retention or disposal, advice will be sought and records retained until a decision is reached.



Appendix - Records Retention Schedule

This Schedule forms the appendix to, and should be read in conjunction with, the Council's Data Retention and Disposal Policy. It sets out the minimum retention periods for records held by Saxmundham Town Council. Where a range or discretionary period is stated, records should be reviewed at the minimum point and retained only if there is a continuing legal, audit, operational or historical need.

1. Governance and Meetings

Record	Minimum Retention Period	Legal / Guidance Basis	Action at End of Period
Signed minutes of Council and Committee meetings	Permanent	Local Government Act 1972	Archive / Suffolk Hold
Draft minutes, notes and recordings	Until minutes approved	Best practice	Secure disposal
Agendas	6 years	NALC LTN 40	Secure disposal / archive
Reports and papers with agendas	6 years	Limitation Act 1980	Secure disposal
Standing Orders, Financial Regulations	Until superseded	Governance requirement	Archive previous versions
Policies and strategies	Indefinite (current + superseded)	Audit / governance	Archive

2. Finance and Audit

Record	Minimum Retention Period	Legal / Guidance Basis	Action
Receipt and payment accounts	Permanent	Audit requirement	Archive
Annual Governance & Accountability Return (AGAR)	Permanent	Audit	Archive / Suffolk Hold
Internal and external audit reports	Permanent	Audit	Archive
Bank statements, paying-in books, cheque stubs	Last completed audit year	Audit	Secure disposal



Record	Minimum Retention Period	Legal / Guidance Basis	Action
Bank reconciliations	6 years	Audit / Limitation Act	Secure disposal
Paid invoices and receipts	6 years	VAT Act 1994	Secure disposal
VAT records	6 years (20 years for land/buildings)	HMRC	Secure disposal
Budgets and precept calculations	6 years	Audit	Secure disposal
Members' allowances records	6 years	Tax / Limitation Act	Secure disposal

3. Legal, Property and Assets

Record	Minimum Retention Period	Legal / Guidance Basis	Action
Title deeds, leases, land agreements	Permanent	Limitation Act 1980	Archive
Asset registers	Permanent	Audit requirement	Archive
Contracts and agreements	6 years after expiry (12 years for deeds)	Limitation Act	Secure disposal
Insurance policies	While current + 2 years	Limitation Act	Secure disposal
Employers' liability insurance certificates	40 years	EL(CI) Regulations 1998	Archive

4. Planning and Consultations

Record	Minimum Retention Period	Basis	Action
Planning applications (determined)	As held on District portal	Statutory	No local retention



Record	Minimum Retention Period	Basis	Action
Major / controversial planning records	Permanent	Precedent / archive value	Archive
Public consultations, surveys and responses	3 years	Management	Secure disposal
Neighbourhood Plan evidence and examination	Permanent	Statutory	Archive

5. Personnel (Staff)

Record	Minimum Retention Period	Legal / Guidance Basis	Action
Personnel files (general)	6 years after employment ends	Limitation Act	Secure disposal
Contracts of employment	6 years after employment ends	Limitation Act	Secure disposal
Payroll and wages records	12 years	HMRC / pensions	Secure disposal
Timesheets	3 years	Limitation Act (PI)	Secure disposal
Pension records	12 years	Pensions legislation	Secure disposal
Recruitment records (unsuccessful)	6 months	Equality Act 2010	Secure disposal
Occupational health records	As advised (usually 6 years)	GDPR / best practice	Secure disposal

6. Councillors

Record	Minimum Retention Period	Basis	Action
Declarations of acceptance of office	Permanent	Governance	Archive



Record	Minimum Retention Period	Basis	Action
Register of interests	Maintained by District Council	Statutory	N/A
Councillor contact details	Until superseded	Management	Secure disposal
Allowances claims	6 years	Tax / audit	Secure disposal

7. Community Services and Facilities

Record	Minimum Retention Period	Basis	Action
Allotment registers and plans	Permanent	Audit / management	Archive
Allotment waiting lists	While current	Management	Secure disposal
Hall / facility hire agreements, invoices	6 years	VAT Act 1994	Secure disposal
Risk assessments	3 years from review	Management	Secure disposal
Inspection and maintenance records	25 years	Management / PI	Secure disposal
Burial registers, grave plans, memorial records	Permanent	Cemeteries legislation	Archive

8. Correspondence and Communications

Record	Minimum Retention Period	Basis	Action
Routine correspondence and emails	6 months – 2 years	Management	Secure disposal
Complaints	5 years after closure	Management	Secure disposal
Press releases and publicity	1 year	Management	Secure disposal



Record	Minimum Retention Period	Basis	Action
Reports and publications	As long as useful	Management	Review then dispose

9. Electronic Records and IT

Record	Minimum Retention Period	Basis	Action
Emails	As per category above	Management	Secure deletion
Portable storage devices	3 years	Information security	Secure destruction
Backup media	1 year	IT policy	Secure destruction
Cryptographic keys	As required	Cyber security	Secure destruction



SAXMUNDHAM TOWN COUNCIL

WEBSITE AND COOKIE POLICY

Review Body: Resources Committee

Policy Approved: Town Council

Approval Date: February 2026

Minute Item:

Review Period: Biennial

Next Review: February 2028



1. Purpose of this Policy

This policy explains how personal data is collected and processed when you visit and use the Saxmundham Town Council website. It should be read alongside the Council's main Privacy Policy, which covers how personal data is used more generally.

2. Data Controller and Website Provider

For the purposes of UK GDPR, Saxmundham Town Council processes personal data collected through its website in connection with its statutory and administrative functions.

The Council's website is hosted and supported by WJP Software Limited, which acts as a data processor on behalf of the Council under a written data processing agreement. Website servers are located in the United Kingdom.

3. Information Collected Automatically

When you visit the Council's website, limited technical information may be collected automatically, including:

- Internet Protocol (IP) address (anonymised where possible)
- Date and time of access
- Pages visited and duration
- Device type and browser information
- Approximate geographic location (town or area level)

This information is used only to monitor website performance, understand how the site is used, and improve content and accessibility.

4. Cookies and Analytics

Cookies are small text files placed on your device when you visit a website. They help the site function properly and help us understand how users interact with the website.

The Council uses cookies only for:

- Essential website functionality; and
- Anonymous website analytics.

Analytics cookies collect information in an anonymised form and do not identify individual users. Analytics data is retained for a limited period (currently up to 14 months) before being automatically deleted.

You will be shown a cookies notice when you first visit the site. You can control or disable cookies through your browser settings; however, some parts of the website may not function correctly if cookies are disabled.

5. Online Forms and Contact



If you submit an enquiry or contact request through the website, the personal information you provide (such as your name and contact details) will be used only to respond to your enquiry or provide the requested information.

Website enquiries are not used for marketing purposes and are not retained longer than necessary.

6. Sharing Website Data

Website-related personal data is not sold or shared with third parties for marketing purposes.

Data may be shared where required to:

- Operate and maintain the website;
- Meet legal or regulatory requirements; or
- Investigate or respond to technical or security issues.

7. Security

Appropriate technical and organisational measures are in place to protect website data against unauthorised access, loss or misuse. These include secure hosting, access controls, and routine system monitoring.

8. Your Rights

You have the same data protection rights in relation to website data as set out in the Council's Privacy Policy, including the right to access, correct or request deletion of your personal data and to complain to the Information Commissioner's Office.

Requests should be made to the Town Clerk at:

Saxmundham Town Council
The Town House, Station Approach, Saxmundham, IP17 1BW
Email: townclerk@saxmundham-tc.gov.uk
Telephone: 01728 604595

MARKET HALL - FEBRUARY 2026

01/02/2026

Balance Brought Forward - Unity Trust Bank Current
Balance Brought Forward - Unity Trust Bank Savings

£2,226.65
£0.00
£2,226.65

Payments

Invoice Date	PO Number	Supplier	Description	Gross	VAT	Net	Code	Authority
n/a		Smartest Energy	Electricity - Month 10	£65.00			4205	Pre-Approved Payments List
n/a		Smartest Energy	Gas - Month 10	£250.00			4205	Pre-Approved Payments List
n/a		Wave	Water - Month 10	£70.00			4205	Pre-Approved Payments List
28/02/2026	n/a	Unity Trust Bank	Bank Charges - Month 11	£8.00			4235	Pre-Approved Payments List
	2/25MH	Suffolk Joinery Ltd	Rear Door and Window Refurbishment - Remainder	£4,497.42	£749.57	£3,747.85	4300	Market Hall Trust - 24/25MHT
31/01/2026	n/a	Fishers	General Supplies	£26.04	£0.00	£26.04		Pre-Approved Payments List
n/a		Red Dune	CCTV Repair	£47.99	£8.00	£39.99		Pre-Approved Payments List
				£4,964.45	£757.57	£3,813.88		

Lloyds Bank Multipay Card

Invoice Date	PO No	Supplier	Description	Gross	VAT	Net	Code	Authority
26/01/2026	n/a	Lloyds Bank	Credit Card Charge - Month 11	-£3.00	£0.00	-£3.00	4235	Pre-Approved Payments List
09/01/2026	n/a	Amazon	General Supplies	-£3.02	-£0.50	-£2.52		Pre-Approved Payments List
				-£6.02	-£0.50	-£5.52		

Receipts

Date	Invoice No	Payer	Description	Amount	Code
n/a		Saxmundham Town Council	Bridging Loan	£5,000.00	
n/a		Saxmundham Town Council	Refurbishment Grant	£684.62	
				£5,684.62	
				£2,940.80	
				£0.00	
				£2,940.80	

28/02/2026

Balance Carried Forward - Unity Trust Bank Current
Balance Carried Forward - Unity Trust Bank Current

MARKET HALL - MARCH 2026

01/03/2026

Balance Brought Forward - Unity Trust Bank Current
Balance Brought Forward - Unity Trust Bank Savings

£2,940.80
£0.00
£2,940.80

Payments

Invoice Date	PO Number	Supplier	Description	Gross	VAT	Net	Code	Authority
n/a		Smartest Energy	Electricity - Month 10	£65.00			4205	Pre-Approved Payments List
n/a		Smartest Energy	Gas - Month 10	£250.00			4205	Pre-Approved Payments List
n/a		Wave	Water - Month 10	£70.00			4205	Pre-Approved Payments List
31/03/2026		Unity Trust Bank	Bank Charges - Month 11	£8.00			4235	Pre-Approved Payments List
n/a		Suffolk Joinery Ltd	Rear Door and Window Refurbishment - Remainder	£5,621.77	£936.96	£4,684.81	4300	Market Hall Trust - 24/25MHT
n/a		The Cleaning Company Suffolk	Kitchen and Toilet Deep Clean	£600.00	£100.00	£500.00	4200	Pre-Approved Payments List
n/a		Saxmundham Town Council	Bridging Loan - Repayment	£5,000.00	£0.00	£5,000.00		
				£11,614.77	£1,036.96	£5,184.81		

Lloyds Bank Multipay Card

Invoice Date	PO No	Supplier	Description	Gross	VAT	Net	Code	Authority
n/a		Lloyds Bank	Credit Card Charge - Month 12	-£3.00	£0.00	-£3.00	4235	Pre-Approved Payments List
				-£3.00	£0.00	-£3.00		

Receipts

Date	Invoice No	Payer	Description	Amount	Code
n/a		Clear Councils	Hall Hire Lost Income	£6,997.50	
n/a		Clear Councils	Dehumidifier Electricity	£956.85	
n/a		East Suffolk Council	Heritage Fund Grant	£4,685.00	
				£12,639.35	
				£3,962.38	
				£0.00	
				£3,962.38	

31/03/2026

Balance Carried Forward - Unity Trust Bank Current
Balance Carried Forward - Unity Trust Bank Current

SALC INTERNAL AUDIT SERVICE – LETTER OF ENGAGEMENT

SALC is committed to providing a high-quality internal audit service which aims to assist local councils to maintain and improve internal controls in accordance with proper practices as set out in the Accounts and Audit Regulations.

This letter of engagement sets the terms of the agreement between SALC and the council which includes details such as the scope, responsibilities and fees. This will need to be approved at the next council meeting and recorded in the minutes of the decision to appoint SALC as the internal auditor for the period 1st April 2025 - 31st March 2026.

Internal audit objectives and responsibilities

The primary objective of internal audit is to review, appraise and report upon the adequacy of internal control systems operating throughout the council, and to achieve this will adopt a predominantly systems-based approach to audit.

The council's internal control system comprises the whole network of systems established within the council to provide reasonable assurance that the council's objectives will be achieved, with reference to:

- the effectiveness of operations
- the economic and efficient use of resources
- compliance with applicable policies, procedures, laws and regulations
- the safeguarding of assets and interests from losses of all kinds, including those arising from fraud, irregularity and corruption
- the integrity and reliability of information, accounts and data

Accordingly, in the conduct of planned audits internal audit may:

- carry out a selective assessment of compliance with relevant procedures and controls expected to be in operation during the financial year to be able to complete the Annual Internal Audit Report (AIAR) section of the Annual Governance and Accountability Return (AGAR).

- review the reliability and integrity of financial information and the means used to identify, measure, classify and report such information
- review the means of safeguarding assets and, as appropriate, verify the existence of such assets
- appraise the economy and efficiency with which resources are employed, identify opportunities to improve performance and recommend solutions to problems
- review the established systems to ensure compliance with those policies, procedures, laws and regulations which could have a significant impact on operations, and determine whether the council complies
- review the operations and activities to ascertain whether results are consistent with objectives and whether they are being carried out as planned

The scope of the internal audit activity

There are no limitations on internal audit's scope of activities. The scope of internal audit allows for unrestricted coverage of the council's activities, including both financial and non-financial systems of internal control.

Independence

The main determinant of the effectiveness of internal audit is that it is seen to be independent in its planning and operation. To ensure this, internal audit will operate within a framework that allows:

- unrestricted access to the officers of the council
- reporting in its own name
- segregation from the day to day operations of the council

Every effort will be made to preserve objectivity by ensuring that all internal auditors are free from any conflicts of interest and do not undertake any non-audit duties on behalf of the council.

Rights of access

There are no limitations on internal audit's access to records. Internal auditors have the authority to:

- access council premises at reasonable times agreed in advance
- access all assets, records, documents, correspondence and control systems
- receive any information and explanation considered necessary concerning any matter under consideration
- require any employee to the council to account for cash, stores or any other council asset under his/her control
- access records belonging to third parties, such as contractors when required

The council's responsibilities

The Responsible Financial Officer and Proper Officer have clearly defined responsibilities for risk management, internal control, internal audit and preventing fraud and corruption.

The existence of internal audit does not diminish the responsibility of the council to establish systems of internal control to ensure that activities are conducted in a secure and well-ordered manner. **Please be aware that if the council are late reporting for the present year, the council will fail the public rights test on the AGAR for the following year.**

Reporting

The internal auditor will formally report the results of audits and the recommendations made to the council and will follow up at subsequent internal audits to make sure that corrective actions are taken.

Data protection

This internal audit offer is an additional service provided by SALC as described in our published privacy notice (section 6) [available on our website here](#). When booking this service you are providing consent to proceed. The delivery of the internal audit service involves the handling of some personal data supplied by the member council.

For the purposes of data protection legislation SALC is the data controller and the internal auditor is the data processor. SALC and internal auditors, whilst separate entities, work in partnership to deliver a service that seeks to support and improve local councils. SALC and the internal auditor have entered into a data sharing agreement as part of their terms of engagement.

Audit fees for 2026

Income/expenditure, whichever is higher (excl. VAT)

Up to £5,000	£128.00
£5,001 - £15,000	£189.00
£15,001 - £25,000	£237.00
£25,001 - £50,000	£290.00
£50,001 - £100,000	£342.00
£100,001 - £200,000	£419.00
£200,001 - £300,000	£505.00
£300,001 - £400,000	£558.00
£400,001 - £500,000	£618.00
£500,001 +	£713.00
Onsite visits will incur mileage expenses at 45p per mile.	
£29 hourly rate for meetings/ad-hoc training/development of materials	

AUDIT PROCEDURE

SALC continues to offer onsite audits to town and larger councils. The SALC admin team will contact you to arrange a suitable date and confirm which auditor will be carrying out the onsite audit.

When allocated the internal auditor shall:

- process the documents in line with SALC's policies and procedures
- raise queries or points of clarification as soon as possible direct with you

The signed AIAR of the AGAR will be signed and presented to you by the auditor on the day of the on-site visit. On receipt of the report admin@suffolk-alc.gov.uk will provide a link to an electronic copy which can be downloaded. This will be sent to both the chairperson and clerk/RFO/lead officer.