

## Kington Town Council

QUALITY TOWN COUNCIL

The Old Police Station, Market Hall Street, Kington HR5 3DP **Telephone** 01544 239098 **email:** clerk@kingtontowncouncil.gov.uk

# Minutes of the Town Council Meeting held on Monday 4<sup>th</sup> March 2019

At The Old Police Station, Market Hall Street, Kington

MEMBERS PRESENT IN ATTENDANCE

Cllr M. Fitton - Chair

Cllr. J. Atkinson

Cllr. E. Banks 1 member of press

Cllr. R Banks 28 members of the public

Cllr. J Dennis

Cllr. F. Hawkins Liz Kelso – Clerk

Cllr. R. MacCurrach Mary Tolhurst – admin assistant

Cllr P. Prior Cllr. E. Rolls

Cllr. R. Widdowson Ward Councillor T. James

Cllr I. Wood-Johnson

## Agenda Minute Item Ref

In view of the interest of members of the public in attendance, it was **agreed** that item 15 would be taken earlier in the meeting than originally indicated.

# 1 038-19 TO RECEIVE APOLOGIES FOR ABSENCE, DECLARATIONS OF INTEREST AND REQUESTS FOR DISPENSATION

Apologies were noted from Cllrs C Forrester and T Bounds. There were no declarations of interest and no requests for dispensation.

## 2 039-19 TO CONFIRM MINUTES OF THE MEETING HELD ON 4<sup>th</sup> FEBRUARY 2019

It was **agreed** that the minutes of the meeting of 4<sup>th</sup> February 2019 be approved, and that the Chairman be authorised to sign the minutes as a true record of proceedings at that meeting.

## 15 040-19 CLIMATE EMERGENCY PROPOSAL

## a To consider proposal to declare a Climate Emergency

The Mayor introduced this subject and Cllr Dennis gave the background to this proposal that had previously been discussed at the last Environment Committee meeting. A member of the public was invited to speak: the local KLEEN group is already working on this and is very willing to work with the Town Council in order to progress the work in hand.

It was proposed by Cllr Dennis and seconded by Cllr MacCurrach that Kington Town Council declares a Climate Emergency.

## **RESOLVED**

Kington Town Council declared a Climate Emergency. This was passed by all in favour.

## b To set up a working party to consider the implications of the resolution and make recommendations on an action plan

After discussion it was agreed that although the Town Council was approaching the Purdah Period and could not make any decisions until after the elections in May, there was an opportunity for preparatory work.

**It was agreed** that the working party set up would be deferred to the new Town Council in May.

## To consider proposal to write to Herefordshire Council to encourage a county-wide declaration of a Climate Emergency

**It was agreed** that Kington Town Council would write to Herefordshire Council to encourage a wider debate.

Members of the public showed much support and appreciation for the Town Council's decisions.

## 3 041-19 PUBLIC PARTICIPATION:

## a **Police report**

There was no Police report for this month.

## b Ward Councillors report

Ward Councillor James updated members on several matters including:

- > The forthcoming Herefordshire Council debate on Climate and energy saving
- The new student accommodation building on the site of the old Rockfield stores. Ward Cllr James also commented on the good reputation of Herefordshire College of Art, which has a very high standing nationally but is not always recognized locally.
- ➤ A £1.2m bid for improving the environments within the Market Towns.

#### c Matters raised by members of the public

A member of the public thanked the Town Council for the Information day. Councillors had answered all of his questions and the information display had been very educational.

## 4 042-19 MAYOR'S REPORT

The Mayor gave a verbal report updating members on his recent work including:

Attending a symposium on the Health and Social Services

- The approaching end of the Kington Health Commission project. The Mayor was reasonably hopeful of a good outcome in spite of many loose ends that still needed to be tied up
- The Town Council's pages for the relaunched Kington Chronical had been submitted: Cllr Fitton thanked Cllr Richard Banks for his part in this.
- ➤ The Community Champions Awards: Possible candidates for the Community Champions Award were discussed
- ➤ His recent attendance at the Mayor's event hosted by the Mayor of Hereford. This had been particularly interesting as there had been much discussion on the Market Towns and the possibilities of their future working together.

The Garth Care Home were congratulated on winning a recent award. It was agreed that the Town Council would write to the Garth and congratulate them on recent achievements.

## 5 043-19 CLERK'S REPORT

The Clerk's report, as attached to these minutes was noted. The Clerk added that there was to be a 'Stop the Drop' day in the County, as part of a nationwide litter picking campaign.

## 6 044-19 FINANCIAL MATTERS

#### (a) Payments

Payments as per the attached schedule totalling £1,654.21 were **agreed**.

#### (b) To consider recommendations of the grants panel

All recommendation from the recent Grants Panel meeting were **approved**. It was generally **agreed** that the Grants criteria were in need of refreshing and that this would be referred to the Finance & General Purposes Committee.

## 7 045-19 TO AGREE FUTURE MEETING DATES

The Clerk presented the coming financial year's schedule of meeting dates and suggested an additional meeting of the full council on 25<sup>th</sup> March to agree all 2018-19 payments. This was **agreed**.

## 8 046-19 TOWN COUNCIL ELECTIONS

## a To note feedback from Town Council Information Day

The Clerk reported a better attendance than expected with members of the public engaging in discussions and with one potential new interested candidate.

## b To note update on Election Timetable

The Clerk now has nomination packs available for anyone wishing to put themselves forward as a candidate for the Town Council at the May elections.

All nomination papers have to be completed and hand delivered by the candidate or a

nominated party to the Elections office no late than Tuesday 3<sup>rd</sup> April.

Should there be 15 or fewer candidates then there would be no need for an election for seats on the Town Council; should there be 16 or more candidates then there would need to be a contested election.

#### C Poll cards

It was agreed that the event of a contested election, that Poll Cards would be requested at an approximate cost of 50p per elector.

# 9 047-19 TO APPROVE/ADOPT DATA PROTECTION POLICY AND POLICY ON SUBJECT ACCESS REQUESTS

It was agreed that the Data Protection Policy and Subject Access Request Procedures, as attached to these Minutes, be adopted.

## 10 048-19 PLANNING MATTERS

To consider the following planning application:

Ref: 190449

Site: Arrow Mills, Island Terrace, Kington Dev: Proposed replacement feed store

After discussion the Town Council made no objection to this application.

## 11 049-19 UPDATE ON REQUEST FOR REDUCTION IN SPEED LIMIT WITHIN THE TOWN CENTRE

Members noted that the survey is still open and that responses are still being sent in. A 20mph within the town would link in with the climate change discussion as a fuel saving / less polluting aspect.

## 12 050-19 COMMUNITY ASSET TRANSFERS: UPDATE

Green Spaces: The Clerk and some of the Councillors had met with Herefordshire Council earlier, where it has been made clear that the Town Council would not be accepting responsibility for the additional footpath running alongside of Crooked Well.

Old Police Station and Market Hall had also been discussed but there was much to be clarified about the facilities and the general liabilities for these buildings.

Discussions will be deferred until after the Elections.

## 13 051-19 TO AGREE DRAFT REVISED MARKET OPERATORS LICENCE AND CONSIDER IMPLICATIONS FOR FUTURE USE OF THE MARKET HALL

As a result of the ongoing discussions with Herefordshire Council, this item was deferred to a later meeting.

## 14 052-19 REPORT FROM WORKING PARTY ON THE FUTURE OF KINGTON POST OFFICE

Members noted that the sorting office is to close in the near future although it is not clear what the implications of this on the Postal Service in Kington would be. There was some discussion about the problems about from where to collect undelivered parcels.

Is it hoped that the retail space in the Post Office can be expanded during the new tenure, to increase the business in the building.

## 16 053-19 TO CONSIDER MARKING 40<sup>TH</sup> ANNIVERSARY OF TOWN TWINNING

Members had several ideas as to how this anniversary could be noted, including a sapling tree, a plaque and a 'road sign' in the Place de Marines pointing to France. It was agreed to defer this decision to the April meeting of Full Council. Members noted that the Marches Makers were planning on making something that could be taken over to Marines as a gift from the Town.

## 17 054-19 REPORTS FROM COUNCILLORS ON MEETINGS ATTENDED

Cllr Rolls: Lady Hawkins Foundation and school Endowment meeting.
Cllr Rolls reported that Lady Hawkins School is amongst the top 20 schools in the country for exam results. It was also reported that the school will be introducing an electronic system for the management of the school meals system.

Cllr Dennis: Footpaths meeting.

Cllr Dennis reported a good attendance and a wide spread of interest at the recent meeting to discuss a joint Footpaths Maintenance Group. Kington Walks are keen to start and might be seen as the lead organisation. The possibility of all members of the Footpaths Maintenance Group joining The Ramblers Association had been mentioned as they could then be covered by that organisation's insurance.

There will be a follow-up meeting once dates can be agreed.

## 18 055-19 REPORTS FROM COMMITTEES

#### a Planning Committee

Cllr Hawkins reported that the Committee had looked at four applications at the last meeting and had made no objections to any of them.

The Lyonshall NDP was now available to view on line, as was the Minerals and Local Waste Plan.

b **Services Committee**: the meeting had been inquorate so did not take place.

#### c Finance & General Purposes Committee

Cllr Widdowson reported on the recent Finance & General Purposes Committee meeting at which the level of reserves had been discussed.

The Committee is investigating the possibility of buying a financial a software package for accounting. The Grants Policy was also discussed and would be referred to Council for consideration at a later meeting. Work has also started on a five year financial plan.

## 19 056-19 ITEMS FOR THE NEXT AGENDA

Asset Transfers/ Market Holders Licence Town Twinning 40<sup>th</sup> anniversary celebrations Pharmacy update

## <sup>20</sup> 057-19 DATE AND TIME OF NEXT MEETING

The next meeting will take place on Monday 1<sup>st</sup> April 2019 at the Old Police Station, Market Hall Street, Kington, commencing at 7.00 pm

There being no further business, the meeting was declared closed at 8.50pm

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Chairman 01.04.2019

KINGTON TOWN COUNCIL
Meeting held on 4<sup>th</sup> March 2019
Agenda item 5 - Clerk's Report

This report identifies activities of the Clerk since the last meeting other than those addressed elsewhere on the agenda or addressed by other Members as part of their report.

#### 1. Clerk's absence

Due to a family bereavement, the Clerk was absent from work from 20<sup>th</sup> to 22<sup>nd</sup> February. As a result, some items have not progressed as anticipated.

#### 2. Casual Vacancies

To date there have been no requests to co-opt a candidate to fill the two casual vacancies.

#### 3. Christmas Lights

Due to the Clerk's absence, the Christmas Lights working party has not yet met.

## 4. Herefordshire Council Rubbish & Recycling Collections

Herefordshire Council has announced changes to the rubbish and recycling collections from 18<sup>th</sup> March 2019. Full details are not yet known but individual households can check their collection day online by inputting their postcode. All households affected by a change will receive a letter through the post about any changes proposed.

## 5. Grit bin on Kingswood Road

The agreed request for a bin to be re-sited has been passed to Herefordshire Council/Balfour Beatty and action is awaited

## 6. Great Herefordshire Spring Clean – Friday 22<sup>nd</sup> March to Tuesday 23<sup>rd</sup> April

Herefordshire Council and Balfour Beatty are running a Great Herefordshire Spring Clean promotion, encouraging communities to get involved in a litter pick. This will coincide with the Great British Spring Clean. Litter picking kit can be borrowed from Balfour Beatty who will also arrange to collect litter collected via the scheme. There are competitions with prizes for the oldest and most unusual piece of litter. Details are available from the Clerk or from the Herefordshire Council website.

## KINGTON TOWN COUNCIL

## DATA PROTECTION POLICY

#### 1. Introduction

Kington Town Council has a responsibility under the Data Protection Act 2018 to hold, obtain, record, use and store all personal data relating to an identifiable individual in a secure and confidential manner. This Policy is a statement of what the Town Council does to ensure its compliance with the Act.

The Data Protection Policy applies to all Town Council employees, councillors, volunteers, and contractors. The Policy provides a framework within which the Town Council will ensure compliance with the requirements of the Act and will underpin any operational procedures and activities connected with the implementation of the Act.

## 2. Background

The Data Protection Act 2018 governs the handling of personal information that identifies living individuals directly or indirectly and covers both manual and computerised information. It provides a mechanism by which individuals about whom data is held (the "data subjects") can have a certain amount of control over the way in which it is handled.

Some of the main features of the Act are:

- All data covered by the Act must be handled in accordance with the Six Data Protection Principles (see Appendix 1)
- The person about whom the information is held (the Data Subject) has various rights under the Act including the right to be informed about what personal data is being processed, the right to request access to that information, the right to request that inaccuracies or incomplete data are rectified, and the right to have personal data erased and to prevent or restrict processing in specific circumstances. Individuals also have the right to object to processing based on the performance of a task in the public interest/exercise of official authority (including profiling), direct marketing (including profiling); and processing for the purposes of scientific/historical research and statistics. There are also rights concerning automated decision making (including profiling) and data portability.
- Processing of special categories of data must be done under a lawful basis. This data includes information about race, ethnic origin, political persuasion, religious belief, trade union membership, genetics, biometrics (where used for identification purposes), health, sex life and sexual orientation.
- The Data Protection Act deals with criminal offence data in a similar way to special category data, and sets out specific conditions providing lawful authority for processing it.
- There is a principle of accountability of data controllers to implement appropriate technical and organisational measures that include internal data protection policies and procedures, staff

training and awareness of the requirements of the Act, internal audits of processing activities, maintaining relevant documentation on processing activities, appointing a data protection officer, and implementing measures that meet the principles of data protection by design and data protection by default, including data minimisation, transparency, and creating and improving security features on an ongoing basis.

- Data protection impact assessments are carried out where appropriate as part of the design and planning of projects, systems and programmes.
- Data controllers must have written contracts in place with all data processors and ensure that processors are only appointed if they can provide 'sufficient guarantees' that the requirements of the Act will be met and the rights of data subjects protected.
- Data breaches that are likely to result in a risk to the rights and freedoms of individuals must be reported to the Information Commissioner's Office within 72 hours of the council becoming aware of the breach. Where a breach is likely to result in a high risk to the rights and freedoms of individuals, the council will notify those individuals concerned directly.
- The Information Commissioner is responsible for regulation and issue notices to organisations where they are not complying with the requirements of the Act. She also has the ability to prosecute those who commit offences under the Act and to issue fines.

## 3. **Policy Statement**

The Town Council is committed to ensuring that personal information is handled in a secure and confidential manner in accordance with its obligations under the Data Protection Act 2018 and professional guidelines. The Town Council will use all appropriate and necessary means at its disposal to comply with the Data Protection Act and associated guidance.

#### 4. Roles and Responsibilities

#### 4.1 Town Clerk

The Town Clerk is responsible for the following tasks:

- Informing and advising the Town Council, any processor engaged by the Town Council as data controller, and any employee of the Town Council who carries out processing of personal data, of that person's obligations under the legislation
- Providing advice and monitoring for the carrying out of a data protection impact assessment
- Co-operating with the Information Commissioner's Office
- Acting as the contact point for the Information Commissioner's office
- Monitoring compliance with policies of the Town Council in relation to the protection of personal data
- Monitoring compliance by the Town Council with the legislation.

In relation to the policies mentioned above, the Town Clerk's tasks include:

- a) Assigning responsibilities under those policies,
- b) Raising awareness of those policies
- c) Training staff involved in processing operations, and
- d) Conducting audits required under those policies.

The Town council must provide the Town Clerk with the necessary resources and access to personal data and processing operations to enable them to perform the tasks outlined above and to maintain their expert knowledge of data protection law and practice.

#### 4.2 Town Council

The Town Council will be responsible for ensuring that the organisation complies with its responsibilities under the Data Protection Act through monitoring of activities and incidents via reporting by the Town Clerk. The Town Council will also ensure that there are adequate resources to support the work outlined in this policy to ensure compliance with the Data Protection Act.

## 4.3 All Staff and Councillors

All staff and councillors will ensure that:-

- Personal information is treated in a confidential manner in accordance with this and any associated policies.
- The rights of data subjects are respected at all times.
- Privacy notices will be made available to inform individuals how their data is being processed.
- Personal information is only used for the stated purpose, unless explicit consent has been given by the Data Subject to use their information for a different purpose.
- Personal information is only disclosed on a strict need to know basis, to recipients who
  are entitled to that information.
- Personal information held within applications, systems, personal or shared drives is only accessed in order to carry out work responsibilities.
- Personal information is recorded accurately and is kept up to date.
- They refer any subject access requests and/or requests in relation to the rights of individuals to the Data Protection Officer.
- They raise actual or potential breaches of the Data Protection Act to the Data Protection Officer as soon as the breach is discovered.

It is the responsibility of all staff and councillors to ensure that they comply with the requirements of this policy and any associated policies or procedures.

#### 4.9 **Contractors and Employment Agencies**

Where contractors are used, the contracts between the Town Council and these third parties should contain mandatory information assurance clauses to ensure that the contract staff are bound by the same code of behaviour as Town council members of staff and councillors in relation to the Data Protection Act.

#### 4.10 **Volunteers**

All volunteers are bound by the same code of behaviour as Town council members of staff and councillors in relation to the Data Protection Act.

## **Records Management**

Good records management practice plays a pivotal role in ensuring that the Town council is able to meet its obligations to provide information, and to retain it, in a timely and effective manner in order to meet the requirements of the Act. All records should be retained and disposed of in accordance with the Town Council retention schedule.

#### Consent

The Town council will take all reasonable steps to ensure that service users, members of staff, volunteers, and contractors are informed of the reasons the Town council requires information from them, how that information will be used and who it will be shared with. This will enable the data subject to give explicit informed consent to the Town council handling their data where the legal basis for processing is consent.

Should the Town council wish to use personal data for any purpose other than that specified when it was originally obtained, the data subject's explicit consent should be obtained prior to using the data in the new way unless exceptionally such use is in accordance with other provisions of the Act.

Should the Town council wish to share personal data with anyone other than those recipients specified at the time the data was originally obtained, the data subject's explicit consent should be obtained prior to sharing that data, failure to do so could result in a breach of confidentiality.

#### **Accuracy and Data Quality** 7

The Town council will ensure that all reasonable steps are taken to confirm the validity of personal information directly with the data subject.

All members of staff and councillors must ensure that service user personal information is checked and kept accurate and up to date on a regular basis, for example, by checking it with the service user when they attend for appointments in order that the information held can be validated.

Where a member of the public exercises their right for their data to be erased, rectified, or restricted, or where a member of the public objects to the processing of their data, the Data Protection Officer must be notified and the appropriate procedures followed.

## **8 Data Protection Impact Assessments**

A data protection impact assessment is a process which helps to assess privacy risks to individuals in the collection, use and disclosure of information. They must be carried out at the early stages of projects and are embedded in to the Town council's decision making process.

#### 9 Providers

The Town council must have written contracts in place with all suppliers who process personal data on behalf of the Town council as "data processors". The Town council will ensure that processors are only appointed if they can provide 'sufficient guarantees' through the procurement process that the requirements of the Act will be met and the rights of data subjects protected.

#### 10 Complaints

Any expression of dissatisfaction from an applicant with reference to the Town council's handling of personal information will be treated as a complaint, and handled under the Town council's complaint's processes. The Data Protection Officer will be involved in responding to the complaint.

Should the complainant remain dissatisfied with the outcome of their complaint to the council, a complaint can be made to the Information Commissioner's Office who will then investigate the complaint and take action where necessary.

#### 11 Security and Confidentiality

All staff and councillors must ensure that information relating to identifiable individuals is kept secure and confidential at all times. The Town council will ensure that its holdings of personal data are properly secured from loss or corruption and that no unauthorised disclosures of personal data are made.

The Town council will ensure that information is not transferred to countries outside the European Economic Area (EEA) unless that country has an adequate level of protection for security and confidentiality of information which has been confirmed by the Information Commissioner.

#### 12 Rights of Data Subjects

Individuals wishing to request their information as a subject access request should contact the Town council, who will arrange for the information to be processed in accordance with the Data Protection Act. Further information on this is available in a separate document, *How to access your records*.

Individuals should also make requests in writing to the Town council if they wish to exercise their other rights under the legislation.

#### **APPENDIX 1**

#### DATA PROTECTION PRINCIPLES

#### **First Principle**

processed lawfully, fairly and in a transparent manner in relation to individuals;

#### **Second Principle**

collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;

### **Third Principle**

adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;

### **Fourth Principle**

accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;

#### Fifth Principle

kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals;

### **Sixth Principle**

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

## KINGTON TOWN COUNCIL

# **General Data Protection Regulations Subject Access Requests**

## How to access your records

You have a right under the Data Protection Act to ask for confirmation that an organisation is processing your data and to see information held on you by that organisation.

You also have the right to be told:

- the purposes of and legal basis for the processing;
- the categories of personal data concerned;
- the recipients or categories of recipients to whom the personal data has been disclosed;
- the period for which the personal data is to be held;
- that you have rights to rectification and erasure of personal data where, for example, factual information has been recorded incorrectly;
- that you have the right to lodge a complaint with the Information Commissioner's Office and the contact details of the Commissioner;
- any information about the origin of the personal data concerned.

This guide is designed to help you to access the information held on you by Kington Town Council.

#### How do I get to see my records?

You make requests for records under the Data Protection Act. The Act requires you to put your request in writing, and show proof of identity. We can't ask you why you want the information, however it's helpful to include in your request what you are looking for so that we can process your request more quickly.

To help you to formulate your request, you can use our form on the web site: <a href="https://www.kingtontowncouncil.gov.uk">www.kingtontowncouncil.gov.uk</a>

Proof of identity is an official document with a photograph, such as a driving licence or a passport or such other means which proves your identity to the satisfaction of Town Council staff.

You can then post/email/take your letter or the form requesting your information and the proof of identity to Kington Town Council, The Old Police Station, Market Hall Street, Kington HR5 3DP. You will receive an acknowledgement within 10 working days.

#### Is there a fee?

The information is provided free of charge, however the town council charges a fee for further copies of the same information provided based on a standard charge per page. If you need extra copies please let us know and we will calculate the cost.

### Can my request be refused?

We can refuse your request if it is manifestly unfounded or excessive. We will explain why we consider your request to be manifestly unfounded or excessive if we do refuse it.

The town council's criteria for refusing a request include:

- If the requester has made numerous requests for their information and been provided with the same information over a short period of time (within one year);
- If the townh council has taken all reasonable steps to locate and provide subject to exemptions
  all of the information held about an individual so nothing further can be provided;
- If the town council would need to process an unreasonable amount of personal data of other individuals to locate information about a particular individual, such as carrying out an email search of all email records.

## How long does it take for me to receive a copy of my records?

Under the Data Protection Act your request must be completed within 30 days of the written request and proof of identity being received by the council.

#### How is the information provided?

Wherever possible, we will provide the information in electronic format. If you wish to have a paper copy instead, please let us know when you make your request.

## Will I see everything in my records?

Usually, you will see all of the information about yourself contained in your file. There are exemptions in the Data Protection Act and other legislation that mean that some things have to be redacted (blanked out) or withheld. These things can include:

- Information given in confidence
- Legal advice
- Information about other people ("third party data")

## Can I change anything in my records?

If there are inaccuracies in your records, you can raise them and depending on what the information is, it will be changed or a note will be kept with the record to show your disagreement with what has been recorded.

#### Can I request information on behalf of other people?

If you are making the request on behalf of another individual to access their information, we will need written consent from the individual to whom the data relates as well as their proof of identity. If you have legal authorisation to act on behalf of an individual, such as if you act with power of attorney or as a litigation friend, you will need to provide a copy of that authorisation to evidence it.

#### **Further information**

For further information, speak to the Town Clerk, Kington Town Council, The Old Police Station, Market Hall Street, Kington HR5 3DP, telephone 01544 239098 or email clerk@kingtontowncouncil.gov.uk

There is also further information about making requests for information about yourself from the Information Commissioner's Office – write to the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, telephone: 01625 545 745, or use the Information Commissioner's Office web site at www.ico.org.uk

February 2018 v1.0