

## **STANDARDS AND ETHICS COMMITTEE**

**Venue:** Town Hall, The Crofts,  
Moorgate Street,  
Rotherham. S60 2TH

**Date:** Thursday 19 January 2023

**Time:** 2.00 p.m.

### **A G E N D A**

**1. Apologies for Absence**

To receive the apologies of any Member who is unable to attend today's meeting.

**2. Declarations of Interest**

To receive declarations of interest from Members in respect of items listed on the agenda.

**3. Exclusion of Press and Public**

To consider whether the press and public should be excluded from the meeting during consideration of any part of the agenda.

Agenda Items 7 and 8 are all exempt from the press and public.

**4. Minutes of the previous meeting held on 15th September, 2022 (Pages 3 - 7)**

To consider and approve the minutes of the previous meeting held on 15<sup>th</sup> September, 2022 as a true and correct record of the proceedings.

**5. Pledge of Civility and Respect - Parish and Town Councils (Pages 9 - 13)**

To consider the Civility and Respect Pledge, its aims and objectives and the requirements for a Local Council to sign up to the Pledge.

**6. Code of Conduct - Data Protection and Confidential Information (Pages 15 - 21)**

To consider guidance to Members in respect of their obligations relating to the Code of Conduct and in particular the use of Personal Data.

**7. Review of Complaints (Pages 23 - 27)**

To give consideration to a report updating the Committee on the Complaints received against Members of the Council, and Town and Parish Councillors alleging a breach of the Code of Conduct.

8. Review of Concerns Raised Pursuant to the Whistleblowing Policy (Pages 29 - 35)


To give consideration to a report regarding concerns raised pursuant to the Whistleblowing Policy and the actions taken to address these matters.

9. Urgent Business

To determine any item which the Chair is of the opinion should be considered as a matter of urgency.

10. Date and Time of Next Meeting

The next meeting of the Standards and Ethics Committee will take place on Thursday, 9<sup>th</sup> March, 2023, commencing at 2.00 p.m.

A handwritten signature in black ink, appearing to read 'S. Kemp'.

**S. KEMP,**  
Chief Executive.

**STANDARDS AND ETHICS COMMITTEE**  
**15th September, 2022**

Present:- Councillor McNeely (in the Chair); Councillors Z. Collingham, Griffin, Hughes, Tarmey, Parish Councillors A. Buckley, M. Carroll and R. Swann and also Mr. P. Edler (Independent Co-optee).

Also in attendance at the invitation of the Chair were Mr. P. Beavers and Mr. D. Roper-Newman, Independent Persons.

Apologies for absence were received from Councillors Bacon and Yasseen and Mrs. A. Bingham, Mrs. M. Evers and Mrs. K. Penney.

**9.                      MINUTE'S SILENCE AS A MARK OF RESPECT FOR THE SAD PASSING OF HER MAJESTY THE QUEEN, ELIZABETH II**

The Committee stood for a minute's silence following the sad passing of Her Majesty The Queen, Elizabeth II, as a mark of respect to reflect on her commitment to public service and devotion to the nations of the United Kingdom and Commonwealth.

**10.                    DECLARATIONS OF INTEREST**

Mr. P. Beavers and Mr. D. Roper-Newman declared personal interests in Minute No. 15 (Re-appointment of Independent Persons) on the basis that they were the Council's current Independent Persons.

Parish Councillor Buckley declared a personal interest in Minute No. 17 (Review of Complaints) on the basis that he had some knowledge of one of the complaints.

**11.                    EXCLUSION OF PRESS AND PUBLIC**

**Resolved:-** That, under Section 100A(4) of the Local Government Act 1972, the press and public be excluded from the meeting for Minute Nos. 16 and 17 (Whistleblowing and Complaints) on the grounds that they involve the likely disclosure of exempt information as defined in Paragraph 3 of Part 1 of Schedule 12A to the Local Government Act 1972.

**12.                    MINUTES OF THE PREVIOUS MEETING HELD ON 16TH JUNE, 2022**

Consideration was given to the minutes of the previous meeting held on 16<sup>th</sup> June, 2022.

**Resolved:-** That the minutes of the previous meeting held on 16<sup>th</sup> June, 2022 be approved as a true and correct record of the proceedings.

### 13. GIFTS AND HOSPITALITY

Consideration was given to the report presented by the Service Manager which set out in detail a possible amendment to the Code of Conduct in respect of the requirement to register Gifts and Hospitality, following the recommendations from the Committee on Standards in Public Life Report into Local Government Ethical Standards.

As reported to the Committee at its last meeting Recommendation 6 was for Local Authorities being required to establish a register of gifts and hospitality, with councillors required to record gifts and hospitality received over a value of £50 or totalling £100 over a year from a single source.

At the last meeting the Committee discussed this issue and it was suggested that officers review other Local Authorities' Codes of Conduct, as to the approach which had been taken in respect of this issue. This had been undertaken and the different approaches adopted were set out in the report.

The Committee debated whether to include reference to the requirement to disclose a number of different gifts from the same source which over a certain period exceeded the stated amount.

The Committee noted that Sheffield City Council adopted the period as the four-year term of office and as part of their discussion considered whether that was appropriate, or some other period should be adopted.

Discussion ensued about the terminology and as such a "four year term". It was suggested this be changed to "term of office".

The Committee were minded to make such an amendment and suggested the amended paragraph of the Code of Conduct be worded as follows:-

*10.2 I notify the Monitoring Officer in writing of any gift, benefit or hospitality with a value in excess of £xx, or accumulatively in excess of £xx from the same source over the term of office which you have been offered as a Member from any person or body other than the Authority within 28 days of receipt.*

The Committee were also provided for information and assurance the form by which Members registered their gifts and hospitality and full details were set out in the Members Induction Handbook.

It was also noted that further, periodic reminders in respect of the requirement to register Gifts and Hospitality were provided in the Members newsletter.

The Committee in viewing the Members Induction Handbook and in particular Section 4 – Standards and Ethics noted that in Section 4.2 there was no reference to the Nolan Principles and would prefer to see them included.

In addition, for the purposes of annual updates it was suggested in Section 4.4 the wording “no later than (date)” be removed and it be left for review and sign off within 28 days.

**Resolved:-** (1) That the amendment to the Members Code of Conduct in respect of the registration of Gifts and Hospitality in respect of cumulative gifts from a single source over a stated period be approved.

(2) That the amendment to the Code of Conduct the wording at paragraph 1.8 with the words “four year term” omitted be adopted.

(3) That the suggested wording amendments to the Members’ Induction Handbook be fed back to appropriate officers.

#### 14. **PROPOSED AMENDMENTS TO THE WHISTLEBLOWING POLICY**

Consideration was given to the report presented by the Service Manager which set out in detail proposed minor amendments to the Whistleblowing Policy following a review of the Policy.

Following the latest review of the Whistleblowing Policy by officers, a small number of minor amendments to the Policy, were proposed (a full copy of the Whistleblowing Policy with suggested amendments in “tracked” version were included as part of the agenda pack) and further amendments were provided at the meeting..

The proposed amendments were “administrative” changes

The legislation referred to in the Policy remained in force and had not been changed. The procedure for dealing with disclosures once they have been received by the Council also remained the same. The telephone numbers and other contact details available for disclosure within the Policy have been checked and were current and as such it was considered that the current Policy, subject to the above amendments, was appropriate and remained fit for purpose.

The Committee sought clarification on whether this Policy included the Town and Parish Councils and were advised the Council had no jurisdiction in this respect and the Town and Parish Councils came under separate legislation.

**Resolved:-** (1) That the proposed amendments to the Whistleblowing Policy be approved.

(2) That subject the Whistleblowing Policy (Appendix 1) be approved.

**15. RE-APPOINTMENT OF INDEPENDENT PERSONS**

Consideration was given to the report presented by the Service Manager which set out the review of the arrangements for the Council's Independent Persons and recommended the reappointment of the current Independent Persons.

The Council's current two Independent Persons have provided significant contribution to the Council's Standards and Ethics regime, one of them being consulted on all complaints received by the Council as well as providing contributions to policy matters and other issues at meetings.

Given the value of this contribution made by the Independent Persons it was suggested that both Independent Persons be reappointed until the end of the 2023/24 municipal year.

**Recommended:- That the current Independent Persons be reappointed until the end of the 2023/24 Municipal Year.**

**16. A REVIEW OF CONCERNS RAISED PURSUANT TO THE WHISTLEBLOWING POLICY**

Consideration was given to the report and appendix presented by the Service Manager which provided an overview of the Whistleblowing cases which have been received over the past year.

Particular reference was made to the appendix to the report which set out clearly the description of the concerns received and action taken.

**Resolved:-** That the Whistleblowing concerns raised over the previous year and the actions taken to address these matters be noted.

**17. REVIEW OF COMPLAINTS**

Consideration was given to the report presented by the Service Manager, detailing the progress with the handling of complaints relating to breaches of the Council's Code of Conduct for Members and Town and Parish Councillors. The report listed the current cases of complaint and the action being taken in respect of each one.

Reference was made to each related case and recommended outcomes/actions identified were highlighted and discussed.

**Resolved:-** That the report be received and the contents noted.

**18. URGENT BUSINESS**

The Chair advised that there were no urgent items of business requiring the Committee's consideration.

**19. DATE AND TIME OF NEXT MEETING**

**Resolved:-** That the next meeting of the Standards and Ethics Committee be held on Thursday, 17<sup>th</sup> November, 2022, commencing at 2.00 p.m.

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Public Report  
Standards and Ethics Committee

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**Committee Name and Date of Committee Meeting**

Standards and Ethics Committee – 19 January 2023

**Report Title**

Civility and Respect Pledge

**Is this a Key Decision and has it been included on the Forward Plan?**

No

**Strategic Director Approving Submission of the Report**

N/A

**Report Author(s)**

Stuart Fletcher, Service Manager, Legal Services  
01709 823523 - [stuart.fletcher@rotherham.gov.uk](mailto:stuart.fletcher@rotherham.gov.uk)

**Ward(s) Affected**

Borough-Wide

**Report Summary**

A report regarding the Civility and Respect Pledge, its aims and objectives and the requirements for a Local Council to sign up to the Pledge.

**Recommendations**

1. That the Committee notes the content of the report and in particular the aims and objectives of the Civility in Respect Pledge and requirements for a local councils to sign up to the Civility and Respect Pledge.
2. That the Committee encourage all local councils in the Borough to sign up to the Civility in Respect Pledge.

**List of Appendices Included**

None

**Background Papers**

None

**Consideration by any other Council Committee, Scrutiny or Advisory Panel**

None

**Council Approval Required**

No

## Exempt from the Press and Public

No

## Civility and Respect Pledge

### 1. Background

- 1.1 The Civility and Respect Pledge is the response by the National Association of Local Councils (NALC) to the growing concerns about the impact bullying, harassment, and intimidation are having on local (parish and town) councils, councillors, clerks and council staff and the resulting effectiveness of local councils. As such NALC have stated that they believe now is the time to put civility and respect at the top of the agenda and start a culture change for the local council sector.
- 1.2 As stated on the NALC website, The Civility and Respect Pledge is being introduced because there is no place for bullying, harassment and intimidation within the local council sector. The pledge is stated to be easy for councils to sign up for and it will enable councils to demonstrate that they are committed to standing up to poor behaviour across the sector and to driving through positive changes which support civil and respectful conduct. NALC invite all councils to take the Civility and Respect Pledge.
- 1.3 The Mission Statement for the Civility in Respect Pledge is as follows:

#### **MISSION STATEMENT**

*Civility and respect should be at the heart of public life, and good governance is fundamental to ensuring an effective and well-functioning democracy at all levels.*

*The intimidation, abuse, bullying and harassment of councillors, clerks and council staff, in person or online, is unacceptable, whether by councillors, clerks, council staff, or public members.*

*This can prevent councils from functioning effectively, councillors from representing local people, discourage people from getting involved, including standing for election, and undermine public confidence and trust in local democracy.*

*NALC, county associations and OVW, as the membership organisations representing the first tier of local government in England and Wales, and the SLCC, as the professional body for clerks, are committed to working together to promote civility and respect in public life, good governance,*

*positive debate and supporting the well-being of councillors, professional officers and staff.*

*To that end, the Civility and Respect Working Group will be working to deliver tangible resources, actions and interventions in four main areas: providing councils with the tools to support good governance; lobbying to strengthen the standards regime and encouraging more people to get involved; training; and processes to intervene to provide support to struggling councils.*

1.4 By taking the Pledge the local council agrees that the council will treat councillors, clerks, employees, members of the public, and representatives of partner organisations and volunteers with civility and respect in their roles and that it:

- Has put in place a training programme for councillors and staff
- Has signed up to the Code of Conduct for councillors
- Has good governance arrangements in place including staff contracts and a dignity at work policy
- Will seek professional help at the early stages should civility and respect issues arise
- Will commit to calling out bullying and harassment if and when it happens
- Will continue to learn from best practices in the sector and aspire to be a role model/champion council through for example the local [Local Council Award Scheme](#)
- Supports the continued lobbying for change in legislation to support the Civility and Respect Pledge including sanctions for elected members where appropriate

1.5 The Working group referred to above has identified a number of changes and improvements considered vital to provide support to help reduce and manage the issues related to bullying and harassment in the local council sector. These factors have been organised into six work streams that will deliver on the mission statement. These work streams are the provision of training, help in relation to Governance arrangements, intervention strategies to assist struggling councils, lobbying in respect of legislative changes to the standards regime, collaborating with the LGA and Lawyers in Local Government (LLG) and enabling whereby bullying and harassment information and support is made available to clerks and councils.

1.6 A host of resources are also made available through the Civility in Respect Project to local councils including guidance around the Code of Conduct, specific statements for local councils website around bullying and harassment, further guidance in respect of HR matters, and resources and guidance covering governance, recruitment, Social Media and training.

- 1.7 Further information in respect of the Civility and Respect Pledge and ongoing Civility and Respect project are available on the NALC website at [www.nalc.gov.uk/our-work/civility-and-respect-project](http://www.nalc.gov.uk/our-work/civility-and-respect-project) and an online presentation in respect of the Civility and Respect Pledge and Project will be provided at the forthcoming meeting of the Committee.

## **2. Key Issues**

- 2.1 The substance of the Civility and Respect Pledge are set out above and with encouragement from the Committee, it is hoped that all local councils within the Borough will sign up to the Pledge.

## **3. Options considered and recommended proposal**

- 3.1 The recommendations are set out above.

## **4. Consultation on Proposal**

- 4.1 The Civility and Respect project has been discussed at the Parish Liaison group with local council representatives and this will provide an ongoing forum to promote the Pledge.

## **5. Timetable and Accountability for Implementing this Decision**

- 5.1 If the recommendations to the Committee are accepted, then contact will be made with all local councils to encourage them to sign up to the Civility in Respect Pledge within a week of the Committee meeting. Whether or not individual local councils do take the Pledge is a matter and decision for each Council. The number of local councils who sign up to the pledge will reported back to the Committee on a biannual basis.

## **6. Financial and Procurement Advice and Implications**

- 6.1 Any work undertaken by Legal Services in dealing with this matter is within the budget for Legal Services.

## **7. Legal Advice and Implications**

- 7.1 The Council and the Standards and Ethics Committee have a statutory duty to promote and maintain high standards of conduct, pursuant to the Localism Act 2011. The encouragement by the Committee for local councils to sign up to the Civility in Respect Pledge is an effective way for the Council to promote and maintain high standards of conduct.

## **8. Human Resources Advice and Implications**

- 8.1 None.

**9. Implications for Children and Young People and Vulnerable Adults**

9.1 None.

**10. Equalities and Human Rights Advice and Implications**

10.1 The aims and objectives of the Civility and Respect Pledge are consistent with treating everybody equally and ensuring that individuals in the local council sector are not subject to bullying and harassment.

**11. Implications for Partners**

11.1 The Civility and Respect Pledge is aimed at local councils and further engagement in respect of the Civility and Respect Pledge through the Parish Liaison Group will be undertaken.

**12. Risks and Mitigation**

12.1 There is a risk that local councils will not engage with the Civility and Respect Project and take the Pledge. The number of local councils signing up to the Pledge will be monitored and further encouragement and engagement will be provided by the Committee and the parish Liaison Group if necessary.

**13. Accountable Officer(s)**

Bal Nahal, Head of Legal Services

*Report Author:* Stuart Fletcher, Service Manager,  
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This report is published on the Council's [website](#).

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Public Report  
Standards and Ethics Committee

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**Committee Name and Date of Committee Meeting**

Standards and Ethics Committee - 19 January 2023

**Report Title**

Standards and Ethics Committee – Data Protection Guidance – Personal Data

**Is this a Key Decision and has it been included on the Forward Plan?**

No

**Strategic Director Approving Submission of the Report**

N/A

**Report Author(s)**

Stuart Fletcher, Service Manager (Commercial and Property)

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**Ward(s) Affected**

Borough-Wide

**Report Summary**

A report providing guidance to members in respect of their obligations relating to the Code of Conduct and in particular the use of Personal Data.

**Recommendations**

1. That the Committee notes the content of the report.
2. That the guidance note at appendix 1 is circulated to members via the Members Newsletter and forwarded to the Parish and Town Council clerks

**List of Appendices Included**

Appendix 1 Data Protection Guidance

**Background Papers**

None

**Consideration by any other Council Committee, Scrutiny or Advisory Panel**

None

**Council Approval Required**

No

**Exempt from the Press and Public**

No

## **Standards and Ethics Committee – Data Protection Guidance – Personal Data**

### **1. Background**

- 1.1 The requirements of the Members Code of Conduct in respect of confidentiality and access to information are set out below:

#### **Confidentiality and access to information**

As a councillor:

4.1 I do not disclose information:

(a) given to me in confidence by anyone

(b) acquired by me which I believe, or ought reasonably to be aware, is of a confidential nature, unless

(i) I have received the consent of a person authorised to give it;

(ii) I am required by law to do so;

(iii) the disclosure is made to a third party for the purpose of obtaining professional legal advice provided that the third party agrees not to disclose the information to any other person; or

(iv) the disclosure is:

1. reasonable and in the public interest; and

2. made in good faith and in compliance with the reasonable requirements of the local authority; and

3. I have consulted the Monitoring Officer prior to its release.

4.2 I do not improperly use knowledge gained solely as a result of my role as a councillor for the advancement of myself, my friends, my family members, my employer or my business interests.

4.3 I do not prevent anyone from getting information that they are entitled to by law.

The guidance within the Code of Conduct states:

Local authorities must work openly and transparently, and their proceedings and printed materials are open to the public, except in certain legally defined circumstances. You should work on this basis, but there will be times when it is required by law that discussions, documents and other information relating to or held by the local authority must be treated in a confidential manner. Examples include personal data relating to individuals or information relating to ongoing negotiations



- 1.2 Further guidance in respect of these matters generally is available in the LGA model Code of Conduct which the Council has adopted.
- 1.3 More detailed guidance in respect of the data protection obligations on members in relation to personal data has been prepared and is at Appendix 1. This provides more specific information as to how Councillors are able to use personal information which they come into possession of in their role as a Councillor, and how to avoid breaching data protection requirements. Should the recommendations within the report be approved, this guidance will be provided to Members and Parish and Town Council clerks.

## **2. Key Issues**

- 2.1 The key issues are set out above.

## **3. Options considered and recommended proposal**

- 3.1 The alternative option to following the recommendations set out above is not to provide further guidance to Members and local councils in relation to compliance with data protection obligations. This option is not recommended.

## **4. Consultation on proposal**

- 4.1 Consultation with the Councils Data Protection Officer has taken place in respect of this report and guidance.

## **5. Timetable and Accountability for Implementing this Decision**

N/A

## **6. Financial and Procurement Advice and Implications**

- 6.1 The officer time in dealing with this issue is met within existing Legal Services resources.

## **7. Legal Advice and Implications**

- 7.1 The Council and the Standards and Ethics Committee have a statutory duty to promote and maintain high standards of conduct. Providing further guidance in respect of the Code of Conduct and in particular members obligations in relation to personal data is an effective way to ensure the Code of conduct is complied with in this area.

## **8. Human Resources Advice and Implications**

None

## **9. Implications for Children and Young People and Vulnerable Adults**

None

## **10. Equalities and Human Rights Advice and Implications**

None

**11. Implications for Partners**

None

**12. Risks and Mitigation**

None

**13. Accountable Officer(s)**

Bal Nahal, Head of Legal Services

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This report is published on the Council's [website](#).

## **Elected Members and Data Protection Guidance for Borough and Parish and Town Councillors**

### **Introduction**

The Data Protection Act 2018 (or the DPA) and the General Data Protection Regulation (or the GDPR) are based around six Principles of good information handling. These Principles give citizens strong rights in relation to their personal information or data, and oblige organisations - such as councils - that are responsible for handling personal data, to do so in specific ways that protect those citizen rights, and also require those organisations to be able to demonstrate compliance with the legislation.

### **The role of a Councillor**

Councillors are likely to have three roles in relation to information handling:

- As a member of the Council, for example as a member of a committee;
- As a representative of residents of their ward, for example, in dealing with complaints or concerns;
- As a member of a political party, particularly at election time.

### **'Dos and Don'ts'**

The attached list of 'Dos and Don'ts' for elected members has been prepared to support councillors in complying with the law. This is being distributed to all Borough Councillors through the members newsletter and Parish and Town Councils.

### **Further information**

The last page also has some more general background information, including definitions (for example explaining what is meant by the term 'personal data'). We hope that you find this guidance helpful, but if you have any questions or concerns, please contact your Council's Data Protection Officer.

### **Data Protection Dos and Don'ts**

#### **Do**

- Look after personal data that is entrusted to you, whether given to you by a resident or constituent, or by a Council officer.
- If you receive personal data from a Council officer, you may only use it for the purpose that it has been given to you and for no other purpose.
- If travelling, keep information secure and do not leave it on view, in unattended vehicles, or overnight in a vehicle (even in the locked boot).
- If a RMBC Councillor - only use the Council's IT equipment, (and authority secured personal devices) and email address for handling personal data, as this keeps it secure.
- Treat in confidence any information that constituents give to you (they will reasonably expect you to do this) unless it is clear that you will be taking up their case with the Council (this is called 'implied consent').

- In multi-member wards, if you need to pass on an individual's personal data to another member you can only do so to:
  - address the resident's concerns, or,
  - where the issue concerns another member(s) in the same ward, or,
  - where the resident has been made aware that this will happen and why it is necessary.
- If a resident objects to the use or disclosure of information about them, this request should be honoured.
- When campaigning for election only use personal data controlled by the party if party rules allow this.
- Only use personal data from mailing lists given to you as a candidate for election, for example by your political party.
- If you lose personal data, or share it accidentally with a third party, please tell the Council's Data Protection Officer straightaway. They will decide what action to take and whether anyone else needs to be advised.
- Understand the council officers are bound by confidentiality rules, and must not give councillors personal data without proper authority - to do so may be in breach of Data Protection legislation

Further to this:

- if you do not understand the rules relating to the Code of Conduct speak to the Monitoring officer, or (if a Parish or Town Councillor) your clerk.
- If you want more information about the handling of information, please speak to the Council's Data Protection Officer (in a Parish or Town Council, via your clerk).

### **Don't**

- Share information given to you by the Council or resident with any third party unless the individual or the Council expects you to, for example to take up an issue with Council officers on a resident's behalf.
- Ask for, or expect Council officers to give you information about an individual that you have no right have access to (for example a resident who has not asked you to act on their behalf).
  - Cases where you obtain, or attempt to obtain such data and you have *no right* to obtain it could be regarded as in breach of Data Protection legislation.
- Use information that you have been given for political purposes unless you have the agreement of a senior officer of the Council. You must not use a list of users of a particular local authority service without their consent.
- Pass on to other ward members personal information that is not connected to the resident's case.

- Allow another person, such as a family member, to access the information on your computer that is used for processing personal data for your work as a Councillor.
- Expect the Council to disclose personal data to you for political purposes, unless the Council has the explicit consent of the person(s) involved.

### **Further information:**

#### What is personal data?

#### **Definition of personal data (GDPR Article 4)**

*“any information relating to an identified or identifiable natural person (“data subject”) who can be identified directly or indirectly by reference to an identifier, such as name, identification number location data, online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person”.*

#### **“Special categories of personal data (GDPR Article 9)**

Special rules relating to the processing of personal data revealing any of the following:

*“racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person’s sex life, or sexual orientation”.*

(Organisations are not permitted to process any of the above special category data without the individuals explicit consent, or in very restricted circumstances)

#### What is not personal data?

‘Legal and “non--natural persons or entities (GDPR Recital 14). Any information relating to the:

*“processing of personal data which concerns legal persons and in particular undertakings established as legal persons, including the name in the form of the legal person and the contact details of the legal person”.*

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By virtue of paragraph(s) 1, 2 of Part 1 of Schedule 12A  
of the Local Government Act 1972.

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