



To All Credition Town Councillors

You are hereby summoned to attend a meeting of **Full Council**, which will be held on **Tuesday, April 21, 2026, at 19:30, at Credition Library, Belle Parade, Credition.**

This meeting may be livestreamed via Facebook in order to allow Members of the Public to watch the meeting.

The purpose of the meeting is to transact the following business.

Rachel Avery FSLCC

Town Clerk

Wednesday, 15 April 2026

Please note that:

- Members of the Press & Public are invited to attend under the Public Bodies (Admission to Meetings) Act 1960. Members of the public will be given the opportunity to address councillors in attendance as part of the agenda.
- Under the Openness of Local Government Bodies Regulations 2014, any members of the public or press are allowed to take photographs, film and audio record the proceedings and report on all public sections of the meeting.
- Under the Local Government Act (LGA) 1972 Sch 12 10(2)(b), Credition Town Council is unable to make any decision on matters not listed within the agenda.
- Credition Town Council will always attempt to record and livestream meetings to Credition Town Council's social media platforms.

AGENDA

2026/509 - Welcome and Introduction

Opening of meeting by the Chair and member introductions

2026/510 - Public Question Time

To receive questions from members of the public relevant to the work of the council (a maximum of 30 minutes is allowed for this item; verbal questions should not exceed 3 minutes)

2026/511 - Apologies

To receive and accept Town Councillor apologies (apologies should be made to the Town Clerk)

2026/512 - Declarations of Interest and Requests for Dispensations

2026/512.1 - To receive declarations of personal interest and disclosable pecuniary interests (DPI's) in respect of items on this agenda

2026/512.2 - To consider any dispensation requests (requests should be made to the Town Clerk prior to the meeting)

2026/513 - Order of Business

At the discretion of the Chair, to adjust, as necessary, the order of agenda items to accommodate visiting members, officers or members of the public

2026/514 - Chair's and Clerk's Announcements

To receive any announcements which the Chair and Town Clerk may wish to make (for information only)

2026/515 - Town Council Minutes

To approve and sign the minutes of the meeting held on **Tuesday 14 April 2026**, as a correct record (minutes will be issued with the agenda)

2026/516 - Town Council Committees and Sub-Committees

Grounds Maintenance Task and Finish Group meeting held on 11 February 2026

2026/517 - County and District Councillor Reports

To receive written reports from County and District Councillors

2026/518 - Reports from Outside Bodies

Hayward's Educational Foundation

Crediton United Charities

Devon Association of Local Councils (& Larger Councils Sub Committee)

Crediton Twinning Association

Boniface Link Association

Mid Devon Community Safety Partnership
Friends of Crediton Station
Sustainable Crediton
Boniface Trail Association
Crediton Chamber of Commerce
Okehampton Rail Forum
League of Friends of Crediton Hospital
Age Concern Trustee
North Devon Line Stakeholder Forum

2026/519 - Finance

2026/519.1 - To receive and approve transactions between 01 March and 31 March 2026

2026/519.2 - To receive and approve the bank reconciliation to 31 March 2026

2026/519.3 - To note bank balances to 31 March 2026

2026/519.4 - To note year to date spend

2026/519.5 - To note Ear Marked Reserves balances

2026/519.6 - To review and approve the 5 year forecast

2026/520 - Reserves Spending

To receive the report by the Deputy Clerk and to consider the recommendations therein

2026/521 - Assertion 10 - AGAR

To receive the report regarding CTC data for Assertion 10, and to review the documentation and agree further actions where required

2026/522 - Standing Orders

Following the motion considered at the meeting held on 17 March 2026 (minute no. 2026/471.1), to review and approve the amended Standing Orders

2026/523 - Policies

To review and adopt the following policies:

IT and Cyber Security Policy
IT and Data Protection Policy
Information and Data Privacy Policy
General Privacy Policy
Privacy Policy for Staff, Councillors and Role Holders
AI Usage Policy
Responding to a Subject Access Request Procedure
Data Breach Policy
Protocol for dealing with FOI Requests
Communications and Media Protocol

2026/524 - Local Council Award Scheme

2026/524.1 - To receive a verbal update on the application

2026/524.2 - To approve an extra ordinary Full Council meeting on Thursday 30 April, to review and submit the application

2026/525 - Newcombes Meadow Paddling Pool

To receive a verbal report from the Town Clerk regarding the paddling pool

2026/526 - Old Landscore School

To receive and note the documentation

2026/527 - Town Wide Survey

2026/527.1 - To approve the creation of a Survey Task and Finish Group

The Task and Finish Group's remit will be to consider questions and make recommendations for its delivery, with recommendations being made to the Oversight Committee

2026/527.2 - To appoint four members to the Survey Task and Finish Group

2026/527.3 - To approve amendment to the meeting calendar

To facilitate a Survey Task and Finish Group meeting, approve that it will meet on 12 May, and the Oversight Committee provisionally be moved to Tuesday 19 May

2026/528 - Public Space Protection Order

To receive the documents relating to a proposed Public Space Protection Order, and to agree a response to MDDC

2026/529 - Date of next meeting

To note that the date of the next meeting will be **Tuesday 05 May 2026**

2026/530 - Part II

To resolve that under section 1(2) of the Public Bodies (Admission to Meetings) Act 1960, the public and press be excluded from the meeting for the following items as it involves the likely disclosure of sensitive and confidential information

2026/531 - Old Landscore School

To receive the Town Clerk's confidential report and to consider the recommendations therein

2026/532 - Reports Pack

Attachments – for internal use only

[2026-04-14 - Full Council - Minutes.docx](#)

[GMC T F Group 11 02 2026.docx](#)

[Transactions 01 March - 31 March.pdf](#)
[Bank rec as at 31 March 2026.pdf](#)
[Bank balances as at 31 March 2026.PDF](#)
[Y2D budget as at 31 March 2026.pdf](#)
[Youth finances as at 31 March 2026.pdf](#)
[EMR levels as at 31 March 2026.pdf](#)
[5 year forecast.xlsx](#)
[Reserves Spending Report.docx](#)
[Assertion 10 Action Plan.docx](#)
[Standing Orders - March 2026 PROPOSED CHANGES.docx](#)
[IT and Cyber Security Policy.docx](#)
[IT and Data Protection Policy.docx](#)
[Information and Data Protection Policy.docx](#)
[General Privacy Notice.docx](#)
[Privacy Policy for Staff, Councillors and Role Holders.docx](#)
[AI Usage Policy.docx](#)
[SAR Procedure.docx](#)
[Data Breach Policy.docx](#)
[Protocol for dealing with FOI requests.docx](#)
[Communications and Media Protocol.docx](#)
[Desk Review of Old Landscore School Feasibility Study.pdf](#)
[Consultation letter PSPO Alcohol Crediton.docx](#)
[Draft PSPO Crediton final.docx](#)



**Minutes of the Full Council meeting held on Tuesday, April 14, 2026
at 19:00 at Credition Library, Belle Parade.**

Present: Cllrs Steve Huxtable, Liz Brookes-Hocking, Guy Cochran, Joyce Harris, Rachel Backhouse, Giles Fawcett, Vix Frisby, Tim Stanford, Jim Cairney (part meeting) and Paul Perriman (part meeting)

Apologies: Cllrs John Downes and Natalia Letch

In Attendance: 19 members of the public

Minute Taker: Emma Anderson

MINUTES

2026/522 WELCOME AND INTRODUCTION

Cllr Huxtable opened the meeting, welcoming all members of the public and advised the order of the agenda would be adjusted to accommodate the items of interest to the majority of attendees. Members introduced themselves.

Cllr Cairney joined the meeting at 19.04

2026/523 PUBLIC QUESTION TIME

A member of the public raised concerns about the Council's compliance with legal standards, particularly regarding the Statement of Internal Control for 2025/26. Issues were highlighted including the Council displaying an outdated Gold Award logo, CCTV signage and the failure to update certain policies including the Model Publication Scheme. The member of the public questioned whether the Council could approve the Statement of Internal Control, based on these issues.

Another member of the public suggested members of the Council carrying out a SWOT analysis together, to look at the Council's strengths and weaknesses. The Chair acknowledged this suggestion.

2026/524 APOLOGIES

Decision: It was **resolved** to receive and accept apologies from Cllrs Downes and Letch. (Proposed by Cllr Harris)

2026/525 DECLARATIONS OF INTEREST AND REQUESTS FOR DISPENSATIONS

2026/525.1 TO RECEIVE DECLARATIONS OF PERSONAL INTEREST AND DISCLOSABLE PECUNIARY INTERESTS (DPI'S) IN RESPECT OF ITEMS ON THIS AGENDA

Cllr Brookes-Hocking declared a personal interest in relation to agenda item 2026/529, planning application 26/00384/LBCDOC.

2026/525.2 TO CONSIDER ANY DISPENSATION REQUESTS (REQUESTS SHOULD BE MADE TO THE TOWN CLERK PRIOR TO THE MEETING)

The Chair confirmed that no dispensation requests had been received prior to the meeting.

2026/526 ORDER OF BUSINESS

Given the large number of members of the public in attendance, the Chair proposed bringing forward agenda item 532, concerning the highways proposal, and taking it as the next item on the agenda.

Decision: It was **resolved** that item 532 would be taken after item 526. (Proposed by Cllr Huxtable)

2026/527 CHAIR'S AND CLERK'S ANNOUNCEMENTS

Agenda item taken as item 2026/528

There were no announcements.

2026/528 TOWN COUNCIL MINUTES

Agenda item taken as item 2026/529

Decision: It was **resolved** to **approve** the minutes of the Full Council meeting held on Tuesday 17 March 2026. (Proposed by Cllr Harris)

2026/529 MID DEVON DISTRICT COUNCIL PLANNING APPLICATIONS

Agenda item taken as item 2026/530

Members reviewed several planning applications submitted to Mid Devon District Council:

26/00262/HOUSE | Erection of a first floor extension over side extension | 51 Spruce Park Crediton Devon EX17 3HJ

Decision: It was **resolved** to recommend APPROVAL, noting that it was a very well-designed addition. (Proposed by Cllr Brookes-Hocking)

26/00384/LBCDOC | Details pursuant to the Discharge of Conditions 5 (relating to detailed drawings) and Condition 6 (floor build ups) of Listed Building Consent 24/01803/LBC | Crediton Town Council Manor Office 6 North Street Crediton Devon EX17 2BT

Cllr Brookes-Hocking declared a personal interest

The application was **noted** with no comments.

26/00424/CAT | Notification of intention to pollard 1 Goat Willow to approximately 2.8m in height; reduce the height and trim the sides of 1 Bay tree by 3m within the Conservation Area | 63 East Street Crediton Devon EX17 3BA

Decision: It was **resolved** to recommend NO OBJECTION. (Proposed by Cllr Brookes-Hocking)

26/00495/HOUSE | Erection of single-storey rear and side extension to include conversion of garage to games room

Decision: It was **resolved** to recommend NO OBJECTION. (Proposed by Cllr Backhouse)

Task: Submit planning comments to MDDC. @Emily Armitage

2026/530 MID DEVON DISTRICT COUNCIL PLANNING DECISIONS

Agenda item taken as item 2026/531

Members **noted** the planning decisions.

2026/531 PREMISES LICENCE

Agenda item taken as item 2026/532

Cllr Backhouse queried the timeframe requested on the application. It was clarified that this is standard practice to avoid the need for frequent licence amendments.

Decision: It was **resolved** to recommend NO OBJECTION. (Proposed by Cllr Brookes-Hocking)

Task: Submit premises licence comments to MDDC. @Emily Armitage

2026/532 HIGHWAYS PROPOSAL

Agenda item taken as item 2026/527

Discussion took place regarding the proposal to extend double yellow lines along Westwood Road. The Chair outlined the usual process, including a consultation period and the opportunity for residents to submit comments directly to Devon County Council.

Cllr Perriman joined the meeting at 19.12

Standing orders were suspended

Several residents expressed their views. Residents supporting the proposal highlighted safety concerns, particularly the danger posed by cars parked near the junctions and on the brow of the hill, which forces drivers into the opposite lane and creates blind spots. They highlighted near misses and the potential for serious accidents, especially for cyclists and pedestrians.

Opponents of the proposal argued that the parked cars did not significantly obstruct visibility and that the primary issue was the speed of vehicles travelling down the hill. They pointed out that the recent addition of double yellow lines had already

reduced available parking and that further restrictions would exacerbate the problem.

Standing orders were reinstated

Members discussed the proposals, agreeing that the speed of vehicles on that road appears to be the greater issue. Members agreed that traffic calming in this area needs to be investigated. Suggestions included speed bumps, 20 mph limits, 'slow down' signs as well as alternative signage on the junction from Salmonhutch to discourage turning right due to the poor visibility.

Cllr Cairney advised that this area poses significant safety risks. He explained that the proposal for double yellow lines had previously been considered but due to safety concerns this decision is being revisited. Due to the complexities of the area senior traffic managers will be involved in the decision, not just the HATOC committee.

It was agreed that a site visit with the highways officer, and possibly more senior staff, would be beneficial to assess the situation thoroughly and explore all options for improving safety.

Decision: It was **agreed** that the comments raised by members of the public would be passed onto Devon Highways for consideration.

Decision: It was **agreed** to arrange a site visit at Westwood Road, for councillors to attend along with the local highways officer.

Task: Submit public comments regarding double yellow lines proposal to Cllr Cairney and DCC Highways Officer. @Emma Anderson

Task: Arrange a site visit for councillors with local highways officer to assess visibility issues and explore solutions for traffic calming measures near Westwood, Crediton. @Emma Anderson, Jim Cairney

2026/533 CREDITON URBAN TASKFORCE [CUT!]

The council received a report from [CUT!], highlighting recent activities on East Street. The excellent community spirit amongst residents at East Street was highlighted. The report was **noted**.

2026/534 POLICIES

The following policies were reviewed:

- Bench Seat Policy

Decision: It was **resolved** to approve the Bench Seat Policy. (Proposed by Cllr Brookes-Hocking)

- Eye Test and Glasses Policy

Decision: It was **resolved** to approve the Eye Test and Glasses Policy. (Proposed by Cllr Harris)

- Leadership in Planning Policy

Decision: It was **resolved** to approve the Leadership in Planning Policy. (Proposed by Cllr Harris)

- Motion Request Form
Decision: It was **resolved** to approve the Motion Request Form. (Proposed by Cllr Brookes-Hocking)
- Tree Risk Management Policy: Cllr Backhouse raised concerns regarding the frequency of inspections. The Deputy Clerk advised that the tree consultant's advice was that two and four year intervals would be appropriate for the sites. Cllr Backhouse queried whether the increased use of Stonypark for Parkrun should be considered in terms of increased risk.

Decision: It was **resolved** to approve the Tree Risk Management Policy with the agreement to include Stonypark in the 2027 QTRA inspection, in order to review inspection frequency. (Proposed by Cllr Huxtable)

Task: Include Stonypark in 2027 QTRA and review inspection frequency following the results of the survey. @Emma Anderson

2026/535 RESERVES SPENDING

Decision: It was **resolved** to approve the recommendations contained in the report, as follows:

- To approve an overspend of £143.10 from the 25/26 Newcombes Meadow toilets supplies & repairs budget.
 - To approve spending £972.50 from EMR 366: Youth underspend 24/25 to purchase a new laptop.
 - To approve spending £972.50 from EMR 339: IT Equipment/Support to purchase a replacement laptop.
 - To approve an overspend of £43.70 from the Council Offices electricity budget.
 - To approve the transfer of £211.23 into new EMR 375: Cluster Grant
- (Proposed by Cllr Brookes-Hocking)

2026/536 STATEMENT OF INTERNAL CONTROL 2025/26

Decision: It was **resolved** to approve the Statement of Internal Control for the financial year 2025/26. (Proposed by Cllr Harris)

2026/537 ASSET REGISTER

Decision: It was **resolved** to approve the Council's Asset Register as at 31 March 2026. (Proposed by Cllr Harris)

2026/538 FLORAL WATERING CONTRACT

Cllr Backhouse queried whether it would be more efficient to alternate the watering of flower beds with the watering carried out every 10 days and the beds fully soaked on each visit. A suggestion was also raised to try using mulch before the next season, before the ground dries out. The Deputy Clerk agreed this could be looked at next year. Cllr Cochran queried whether water retention crystals are used in the soil. The Deputy Clerk agreed to contact the contractors regarding options to improve watering efficiency within the schedule as well as contacting the nursery regarding water retention crystals.

Decision: It was **resolved** to appoint Contractor A to carry out the floral watering contract for 2026. (Proposed by Cllr Harris)

Task: Instruct Contractor A to carry out the watering of floral displays from 1 June - 30 Sept 2026. @Emma Anderson

2026/539 TOWN SQUARE BENCH CLEANING

The Council discussed the proposal for cleaning benches in the Town Square. Cllr Backhouse highlighted the need for regular cleaning, especially during the summer and before events. A suggestion was made to approach the new owners of the Three Little Pigs to see if they would consider contributing to the cleaning. Concerns about liability and public safety were raised in regard to a regular cleaning schedule being adhered to.

Decision: It was **resolved** to obtain quotes for cleaning the benches on the town square over the summer, with the addition of engaging with the new owners of the Three Little Pigs to explore potential collaboration. (Proposed by Cllr Backhouse)

Task: Investigate costs for regular bench cleaning services during summer months, including weekly and fortnightly. @Emma Anderson

Task: Engage with the new owners of the Three Little Pigs to discuss potential collaboration on maintaining cleanliness of benches on the town square. @Tim Bland

2026/540 CREDITON AREA ASSOCIATION OF LOCAL COUNCILS

The report was **noted**.

2026/541 DATE OF NEXT MEETING

It was **noted** that the date of the next meeting would be Tuesday, 21 April 2026. Meeting closed at 20.38.

2026/542 REPORTS PACK

Signed

Dated.....



**Minutes of the Grounds Maintenance Task & Finish Group meeting held on
Wednesday, 11 March 2026 at 19:00 in Manor Office, 6 North Street, Crediton**

Present: Cllrs Steve Huxtable, Giles Fawssett, Joyce Harris and Tim Stanford
Apologies: Cllr Natalia Letch
Minute Taker: Emma Anderson

MINUTES

It was noted that the item to elect a chair had been omitted from the agenda.

Decision: It was **resolved** to elect Cllr Huxtable as Chair of the Task & Finish Group
(Proposed by Cllr Harris)

1 APOLOGIES

Decision: It was **resolved** to receive and accept apologies from Cllr Letch. (Proposed by Cllr Huxtable)

2 DECLARATIONS OF INTEREST AND REQUESTS FOR DISPENSATIONS

2.1 TO RECEIVE DECLARATIONS OF PERSONAL INTEREST AND DISCLOSABLE PECUNIARY INTERESTS (DPI'S) IN RESPECT OF ITEMS ON THIS AGENDA

There were no declarations of interest.

2.2 TO CONSIDER ANY DISPENSATION REQUESTS (REQUESTS SHOULD BE MADE TO THE TOWN CLERK PRIOR TO THE MEETING)

No dispensation requests had been received.

3 GROUNDS MAINTENANCE CONTRACT 2026-2029

All tender applications were reviewed and scored using the evaluation criteria.

Decision: It was **resolved** to recommend to Full Council that Contractor A be appointed to carry out the Grounds Maintenance Contract for 2026-2029, subject to satisfactory references and an onsite meeting prior to contract start date. (Proposed by Cllr Harris)

It was **agreed** to make a further recommendation for Full Council to approve approaching the second highest scoring applicant, Contractor B, should the outcome of the pre-contract checks on Contractor A be unsatisfactory.

4 CLOSE

Meeting closed at 19.56.

Signed

Dated.....

Receipts for Month 12

Nominal Ledger Analysis

<u>Receipt Ref</u>	<u>Name of Payer</u>	<u>£ Amnt Received</u>	<u>£ Debtors</u>	<u>£ VAT</u>	<u>A/c</u>	<u>Centre</u>	<u>£ Amount</u>	<u>Transaction Detail</u>
Balance Brought Fwd :		159,280.37					159,280.37	
	Banked 11/03/2026	24.57						
#332	Allotment Barnfield	24.57			1150	160	22.40	B7 Rent 25/26
					1170	180	2.17	B7 BAA 25/26
	Banked 17/03/2026	5.00						
#333	Youth Club (YW)	5.00			1240	410	5.00	Subs - Girls Group
	Banked 19/03/2026	98.00						
#334	Youth Club (YW)	10.00			1240	410	10.00	Subs
#335	Youth Club (YW)	22.00			1240	410	22.00	Woodlands trip
#336	Youth Club (YW)	22.00			1240	410	22.00	Woodlands Trip
#337	Youth Club (YW)	22.00			1240	410	22.00	Woodlands Trip
#338	Youth Club (YW)	22.00			1240	410	22.00	Woodlands Trip
	Banked 23/03/2026	6.00						
#339	Youth Club (YW)	6.00			1240	410	6.00	Subs
	Banked 24/03/2026	22.00						
#340	Youth Club (YW)	22.00			1240	410	22.00	Woodlands Trip
	Banked 26/03/2026	22.00						
#341	Youth Club (YW)	22.00			1240	410	22.00	Woodlands Trip
	Banked 27/03/2026	144.85						
#342	Youth Club (YW)	32.85			1240	410	17.85	Subs - Weds Group
					1240	410	12.00	Subs - Panto
					1240	410	3.00	Subs - Girls Group
#343	Youth Club (YW)	46.00			1240	410	34.00	Subs - Weds Group
					1240	410	12.00	Subs - Girls Group
#344	Youth Club (YW)	22.00			1240	410	22.00	Woodlands Trip
#345	Youth Club (YW)	22.00			1240	410	22.00	Woodlands Trip
#346	Youth Club (YW)	22.00			1240	410	22.00	Woodlands Trip
	Banked 30/03/2026	22.00						
#347	Youth Club (YW)	22.00			1240	410	22.00	Woodlands Trip
	Banked 31/03/2026	52.55						
#348	Allotment Exhibition	8.55			1150	150	7.80	E13 Rent 25/26
					1170	180	0.75	E13 BAA 25/26
#349	Youth Club (YW)	22.00			1240	410	22.00	Woodlands Trip
#350	Youth Club (YW)	22.00			1240	410	22.00	Woodlands Trip
Total Receipts for Month		396.97	0.00	0.00			396.97	
Cashbook Totals		159,677.34	0.00	0.00			159,677.34	

Payments for Month 12

Nominal Ledger

<u>Date</u>	<u>Payee Name</u>	<u>Reference</u>	<u>£ Total Amnt</u>	<u>£ Creditors</u>	<u>£ VAT</u>	<u>A/c</u>	<u>Centre</u>	<u>£ Amount</u>	<u>Transaction Detail</u>
02/03/2026	Lee	SO #616	1,408.33			4400	250	1,408.33	Manor Office rent
04/03/2026	EE Ltd	DD #617	21.60		3.60	4720	410	18.00	Youth mobile phone bill
05/03/2026	Spar	CARD #618	2.29			4720	410	2.29	Youth - Weds group food
05/03/2026	Morrisons	CARD #619	2.50			4720	410	2.50	Youth weds group
05/03/2026	Cloudy IT	DD #620	28.80		4.80	4070	120	24.00	IT support - tablets
06/03/2026	Tesco	CARD #621	41.39			4720	410	41.39	Youth - GG food
06/03/2026	Libraries Unlimited SW	BACS #622	15.00			4720	410	15.00	Room hire
06/03/2026	Boniface Centre	BACS #623	60.00			4210	130	60.00	Room hire - traders meeting
06/03/2026	Libraries Unlimited SW	BACS #624	66.25			4720	410	66.25	Room hire
06/03/2026	Libraries Unlimited SW	BACS #625	130.00			4210	130	80.00	Room hire
						4720	410	50.00	Room hire
06/03/2026	Libraries Unlimited SW	BACS #626	130.00			4210	130	80.00	Room hire
						4720	410	50.00	Room hire
06/03/2026	The Makers Boutique	BACS #627	150.00			4720	410	150.00	Youth - workshop
06/03/2026	Crediton Farmers Market	BACS #628	150.00			4680	470	150.00	VJ Day - gazebo hire
06/03/2026	E Armitage	BACS #629	194.00			4130	130	194.00	Expenses claim
06/03/2026	Devon County Council	BACS #630	194.04		7.59	4720	410	186.45	Youth - DBS checks
06/03/2026	Crediton Farmers Market	BACS #631	200.00			4650	390	200.00	CinC - gazebo hire
06/03/2026	Normanton Screen Printing	BACS #632	361.14		60.19	4450	270	300.95	CCTV signs
06/03/2026	Nexus Open Systems	BACS #633	420.00		70.00	4720	410	350.00	Youth laptop & ipad services
06/03/2026	Ward	BACS #634	1,482.00		247.00	4650	390	1,235.00	CinC - take down
09/03/2026	Morrisons	CARD #635	3.18			4720	410	3.18	Youth - refreshments
11/03/2026	Morrisons	CARD #636	40.10			4440	250	40.10	Training refreshments
12/03/2026	Tesco	CARD #637	33.40			4720	410	33.40	Youth - stationery
13/03/2026	Spar	CARD #638	5.00			4720	410	5.00	Youth - GG food
16/03/2026	Tesco	CARD #639	13.70			4205	130	13.70	Community Conv - refreshments
16/03/2026	Nexus Open Systems	DD #640	393.42		65.57	4070	120	327.85	IT support - Feb/March
17/03/2026	National Community Land Trust	BACS #641	97.50			4120	410	97.50	CLT membership
						336	0	-97.50	CLT membership
						6000	410	97.50	CLT membership
17/03/2026	Noticeboard Company (UK) Ltd	BACS #642	580.74		96.79	4230	230	483.95	Community noticeboard
17/03/2026	Adams	BACS #643	17.96		2.99	4020	365	14.97	Town maintenance supplies
17/03/2026	Crediton Arts Centre	BACS #644	96.00			4720	410	96.00	Youth - room hire
17/03/2026	Boniface Centre	BACS #645	130.00			4205	130	130.00	Room hire - Com Conversation
17/03/2026	Logical Heating Ltd	BACS #646	288.00		48.00	4090	120	240.00	Eve telephony licence
17/03/2026	G Fawssett	BACS #647	289.88			4270	190	250.00	Expenses - Wildlife area
						4230	190	39.88	Expenses - Wildlife area
17/03/2026	Rogers	BACS #648	325.00			4650	390	225.00	CinC take down
						4470	300	100.00	Bench repair
						322	0	-100.00	Bench repair
						6000	300	100.00	Bench repair
17/03/2026	Pure Systems	BACS #649	330.00		55.00	4175	130	275.00	Website hosting 26/27
17/03/2026	IAC Audit & Consultancy Ltd	BACS #650	474.00		79.00	4105	120	395.00	Data protection review
17/03/2026	Gibb Painting & Decorating	BACS #651	525.00			4230	230	525.00	WM bus shelter - painting
17/03/2026	SLCC	BACS #652	532.00			4190	130	532.00	Membership fee

Date: 14/04/2026

Crediton Town Council FY 2025-26

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Time 11:00

Cashbook 1

User: RA

Co-Operative 9217

For Month No: 12

Payments for Month 12

Nominal Ledger

<u>Date</u>	<u>Payee Name</u>	<u>Reference</u>	<u>£ Total Amnt</u>	<u>£ Creditors</u>	<u>£ VAT</u>	<u>A/c</u>	<u>Centre</u>	<u>£ Amount</u>	<u>Transaction Detail</u>
17/03/2026	Exe Valley Maintenance Service	BACS #653	576.00		96.00	4230	220	320.00	Pressure washing
						4230	280	160.00	Pressure washing
17/03/2026	The Turning Tides Project	BACS #654	746.25			4020	365	746.25	Town maintenance - Feb
17/03/2026	Mid Devon District Council	BACS #655	3,600.00		600.00	4250	410	3,000.00	Grass verge cutting 25-26
20/03/2026	Tesco	CARD #656	7.65			4720	410	7.65	Youth - GG food
20/03/2026	Wage payments	BACS #657	11,908.19			4000	110	8,179.36	Salaries - March
						4005	110	3,728.83	Salaries - March
20/03/2026	■ Parkhouse	BACS #658	240.00			4195	130	240.00	Honorarium - Floral
20/03/2026	Peninsula Pensions	BACS #659	3,806.15			4040	110	2,947.90	Pensions - March
						4015	110	858.25	Pensions - March
23/03/2026	BT	DD #660	91.08		15.18	4075	120	75.90	Broadband charges
24/03/2026	Chestnut Trees	BACS #661	2,700.00		450.00	4560	360	2,250.00	PC1 tree works - PP & UD
25/03/2026	Waterhaul	CARD #662	134.40		22.40	4730	410	112.00	Litter picking equipment
25/03/2026	SLCC	REF #602	-102.00		-17.00	4190	130	-85.00	Refund - Regional Seminar
26/03/2026	Post Office	CARD #663	5.30			4065	120	5.30	Postage
26/03/2026	Concorde	DD #664	52.71		8.78	4060	120	43.93	Printing charges - Jan
26/03/2026	Sustainable Crediton	BACS #665	36.92			4590	380	36.92	Compost for Newcombes
26/03/2026	C Kelly	BACS #666	47.80			4130	130	47.80	Travel expenses
26/03/2026	Hedgerow Print	BACS #667	18.00		3.00	4205	130	15.00	Com Conv - map printing
26/03/2026	Source for Business	BACS #668	29.65		2.73	4235	250	26.92	Manor Office - water
26/03/2026	Pure Systems Ltd	BACS #669	47.57		7.93	4175	130	39.64	Website form upgrade
26/03/2026	E Anderson	BACS #670	49.00			4130	130	49.00	Expenses claim
26/03/2026	Peck & Strong	BACS #671	73.82			4205	130	73.82	Com Conv - refreshments
26/03/2026	Lee Accounting (SW) Ltd	BACS #672	230.40		38.40	4055	120	192.00	Payroll fees
26/03/2026	S Huxtable	BACS #673	1,190.30			4215	130	828.90	Dokkum visit - ferry
						4145	130	330.00	Mayoral - suits & shirts
						4730	410	31.40	CUT refreshments
26/03/2026	Vivian Architecture Ltd	BACS #674	3,450.00			4120	250	3,450.00	MO planning works
						338	0	-3,450.00	MO planning works
						6000	250	3,450.00	MO planning works
26/03/2026	HMRC	BACS #675	3,983.82			4030	110	3,284.85	NI/PAYE - March
						4010	110	638.97	NI/PAYE - March
						4195	130	60.00	NI/PAYE - March
26/03/2026	Mid Devon District Council	BACS #676	26.00			4230	220	26.00	War Memorial sweeping
26/03/2026	■ Stephenson	REF #295	-197.67			4005	110	-197.67	Salary repayment
27/03/2026	ReFurnish	CARD #677	3.00			4720	410	3.00	Youth - GG supplies
27/03/2026	Morrisons	CARD #678	31.37			4720	410	31.37	Youth - GG Easter
27/03/2026	Valda Energy	DD #679	47.55		2.26	4290	340	9.02	Necombes toilet - electricity
						4290	350	36.27	OLS - electricity
30/03/2026	Lidl	CARD #680	1.99		0.33	4115	120	1.66	Office supplies/consumables
30/03/2026	Lidl	CARD #681	2.78		0.17	4730	410	2.61	CUT refreshments
30/03/2026	Nexus Open Systems	DD #682	223.39		37.23	4070	120	186.16	IT Support - Mar/April
31/03/2026	R Avery	BACS #683	73.34			4130	130	73.34	Expenses claim
31/03/2026	■ Turnbull	BACS #684	200.00			4260	190	200.00	SMG remedial works
31/03/2026	Time Assured Ltd	BACS #685	312.00		52.00	4370	240	260.00	Town Clock service &

Continued on Page 18

Payments for Month 12				Nominal Ledger					
<u>Date</u>	<u>Payee Name</u>	<u>Reference</u>	<u>£ Total Amnt</u>	<u>£ Creditors</u>	<u>£ VAT</u>	<u>A/c</u>	<u>Centre</u>	<u>£ Amount</u>	<u>Transaction Detail</u>
31/03/2026	Turnbull	BACS #686	700.00			4230	190	700.00	repair SMG maintenance
31/03/2026	Pugsley	BACS #687	1,394.42			4230	250	1,394.42	Electrical work 8/8a North St
						328	0	-1,394.42	Electrical work 8/8a North St
						6000	250	1,394.42	Electrical work 8/8a North St
31/03/2026	Bang Bang Boxing	BACS #688	2,011.00			4750	420	2,011.00	Grant funding
Total Payments for Month			46,984.40	0.00	2,059.94			44,924.46	
Balance Carried Fwd			112,692.94						
Cashbook Totals			159,677.34	0.00	2,059.94			157,617.40	

Receipts for Month 12

Nominal Ledger Analysis

<u>Receipt Ref</u>	<u>Name of Payer</u>	<u>£ Amnt Received</u>	<u>£ Debtors</u>	<u>£ VAT</u>	<u>A/c</u>	<u>Centre</u>	<u>£ Amount</u>	<u>Transaction Detail</u>
Balance Brought Fwd :		697,608.38					697,608.38	
	Banked 03/03/2026	2,013.72						
CCLA #12	CCLA	2,013.72			1090	120	2,013.72	Interest on account
Total Receipts for Month		2,013.72	0.00	0.00			2,013.72	
Cashbook Totals		699,622.10	0.00	0.00			699,622.10	

Payments for Month 12				Nominal Ledger					
<u>Date</u>	<u>Payee Name</u>	<u>Reference</u>	<u>£ Total Amnt</u>	<u>£ Creditors</u>	<u>£ VAT</u>	<u>A/c</u>	<u>Centre</u>	<u>£ Amount</u>	<u>Transaction Detail</u>
			0.00						
Total Payments for Month			0.00	0.00	0.00	0.00			
Balance Carried Fwd			699,622.10						
Cashbook Totals			699,622.10	0.00	0.00	699,622.10			

**Bank Reconciliation Statement as at 31/03/2026
for Cashbook 1 - Co-Operative 9217**

<u>Bank Statement Account Name (s)</u>	<u>Statement Date</u>	<u>Page</u>	<u>Balances</u>
Co-Operative Current 15006951	31/03/2026	348	112,692.94
			<u>112,692.94</u>
<u>Unpresented Payments (Minus)</u>		<u>Amount</u>	
		0.00	
			<u>0.00</u>
			112,692.94
<u>Unpresented Receipts (Plus)</u>			
		0.00	
			<u>0.00</u>
			112,692.94
		Balance per Cash Book is :-	112,692.94
		Difference is :-	0.00

R Avery (Clerk/RFO):

Name Signed Date

Signatory 2:

Name Signed Date

Signatory 1:

Name Signed Date

**Bank Reconciliation Statement as at 31/03/2026
for Cashbook 7 - CCLA**

<u>Bank Statement Account Name (s)</u>	<u>Statement Date</u>	<u>Page</u>	<u>Balances</u>
CCLA	31/03/2026		699,622.10
			<u>699,622.10</u>
<u>Unpresented Payments (Minus)</u>		<u>Amount</u>	
		0.00	
			<u>0.00</u>
			699,622.10
<u>Unpresented Receipts (Plus)</u>			
		0.00	
			<u>0.00</u>
			699,622.10
		Balance per Cash Book is :-	699,622.10
		Difference is :-	0.00

R Avery (Clerk & RFO):

Name Signed Date

Signatory 2:

Name Signed Date

Signatory 1:

Name Signed Date

701-0892996580921700-080426-004459.12465.txt

BRANCH : BUSINESS DIRECTPLUS

0892996580921700

PAGE 348

BIC : CPBKGB22

IBAN : GB41CPBK08929965809217

TYPE : CHARITY COMM CREDITON TOWN COUNCIL

7 APR 26

Date	Description	Withdrawals	Deposits	Balance
30 MAR 26				117,331.15
31 MAR 26		73.34		
31 MAR 26		200.00		
31 MAR 26		312.00		
31 MAR 26		700.00		
31 MAR 26		1,394.42		
31 MAR 26		2,011.00		
31 MAR 26			8.55	
31 MAR 26			22.00	
31 MAR 26			22.00	112,692.94
01 APR 26		68.32		
01 APR 26		86.40		
01 APR 26		346.75		
01 APR 26		48.06		
01 APR 26		21.60		
01 APR 26		1,408.33		
01 APR 26			6.00	
01 APR 26			22.00	
01 APR 26			22.00	
01 APR 26			225.00	110,988.48
02 APR 26		200.00		
02 APR 26		318.66		
02 APR 26			5.00	110,474.82
07 APR 26		619.15		
07 APR 26			19.96	
07 APR 26			15.00	109,890.63

Statement of Account

Mrs Rachel Avery
Manor Office
6 North Street
Credition
EX17 2BR

5 April 2026

Account name: **CREDITON TOWN COUNCIL**
Account number: **PS3078933-001**
Statement period: **28/02/2026 to 31/03/2026**

Account summary

Total valuation as at 31 March 2026 **£699,622.10**
Total valuation as at last statement at 28 February 2026 **£697,608.38**

Holdings as at 31 March 2026

Fund name	Unit/share holdings	Price per unit/share	Value
Public Sector Deposit Fund SC4 - Public Sector GB00B3LDFH01	699,622.1000	£1.00	£699,622.10
			Total value
			£699,622.10

Transactions for the period from 28 February 2026 to 31 March 2026

Public Sector Deposit Fund SC4 - Public Sector

Transaction date	Transaction type	Unit/shares	Price per unit/share	Amount (GBP)
03/03/2026	Income Reinvestment	2,013.7200	£1.0000	£2,013.72

Correspondence address: PO Box 12892, Dunmow, Essex CM6 9DL

clientservices@ccla.co.uk

Freephone 0800 022 3505

www.ccla.co.uk

Fund documentation is available at www.ccla.co.uk/investments, or may be requested from our Client Services team. Telephone calls are recorded.
CCLA Investment Management Limited (registered in England & Wales, No. 2183088) is authorised and regulated by the Financial Conduct Authority.
Registered address: One Angel Lane, London EC4R 3AB.

Crediton Town Council FY 2025-26

Bank - Cash and Investment Reconciliation as at 31 March 2026

Confirmed Bank & Investment Balances

Bank Statement Balances

31/03/2026	Co-Operative Current 15006951	112,692.94
31/03/2026	Nationwide Account 90097276	0.00
31/03/2026	CCLA	699,622.10

812,315.04

Receipts not on Bank Statement

0.00

Closing Balance

812,315.04

All Cash & Bank Accounts

1	Co-Operative C/Account 9217	112,692.94
3	Nationwide Account 7276	0.00
7	CCLA	699,622.10

Other Cash & Bank Balances

0.00

Total Cash & Bank Balances

812,315.04

Year To Date Budget 2025-2026

EXPENDITURE	Budget	April	May	June	July	August	Sept	Oct	Nov	Dec	Jan	Feb	March	EXPENDITURE	%Budget Spent	Remaining	Total Spend
Salaries														Salaries			
Salaries, including NI & Pensions	240,000	18,264	18,024	17,692	17,554	19,480	18,888	19,555	17,996	18,765	18,773	18,699	19,440	Salaries, including NI & Pensions	93%	16,870	223,130
Payroll	300												192	Payroll	64%	108	192
Office Administration														Office Administration			
Photocopier/Printing	1,000	(140)	140	55	157		110	16	114	21	84	44	44	Photocopier/Printing	65%	355	645
Postage	250	4			6	51	4	5	8		10	3	5	Postage	38%	154	96
IT Support (Increase from virement by £600 as per FC)	6,800	517	528	528	363	690	525	551	370	737	624	538	538	IT Support	96%	291	6,509
Telephone/Broadband	1,800	149	149	149	149	149	149	217	76	288	76	76	76	Telephone/Broadband	95%	97	1,703
Audit Fees	2,500		395					1,365	395					Audit Fees	86%	345	2,155
Stationery	250	16	14	24	2		29							Stationery	34%	165	85
Software	4,000	379	1,250					150		58			240	Software	52%	1,923	2,077
Reference books	150													Reference books		150	
Security Waste Collection	50				12									Security Waste Collection	24%	38	12
Legal/Professional Services (Increase from EMR by £1,500 as per FC)	6,500	885			1,032		2,125		1,500	166			395	Legal/Professional Services*	94%	397	6,103
Insurance	5,500		4,283		1,054									Insurance	97%	163	5,337
Office Equipment	1,500							1,453						Office Equipment	97%	47	1,453
Other	500	2	70					100	20	(5)		62		Other	50%	251	249
Office Supplies/Consumables	500	77	62	19	43	17	81					11	2	Office Supplies/Consumables	62%	188	312
Defibrillator Renewal (approved from General Res)	-			1,800										Defibrillator Renewal	-	1,800	1,800
Contract termination (approved from General Res 161225)	-								1,755						-	1,755	1,755
Council and Councillors														Council and Councillors			
Councillor/Clerk Expenses	1,200	608	20		117						29		364	Councillor/Clerk Expenses	95%	62	1,138
Councillor e-mail addresses	-													Councillor e-mail addresses		-	
Advertising	750					66		120						Advertising	25%	564	186
Mayor's Allowance	600												330	Mayor's Allowance	55%	270	330
Councillor Allowances	1,440					624								Councillor Allowances	43%	816	624
Annual Town Meeting	400			54										Annual Town Meeting	14%	346	54
Mayor's Reception	2,000													Mayor's Reception		2,000	
Hospitality	200									112				Hospitality	56%	88	112
Remembrance Day	1,200										25			Remembrance Day	2%	1,175	25
Website	1,800	275								75			315	Website	37%	1,135	665
Website Accessibility Work	-													Website Accessibility Work		-	
Subscriptions	2,500	1,423	108						100		47			Subscriptions	67%	822	1,678
Staff/Councillor Training	4,000				160			495	179	2,097	50	85	447	Staff/Councillor Training	88%	487	3,513
Honorarium	400												300	Honorarium	75%	100	300
Parking Permit	600									409				Parking Permit	68%	191	409
Public Consultations	500												233	Public Consultations	47%	267	233
Meeting Room Charges (Increase from GR by £450 as per FC)	950		29		74		49		22	20	367		220	Meeting Room Charges	82%	169	781
Civic Functions	6,000												829	Civic Functions	14%	5,171	829
Allotments														Allotments			
Exhibition Road general/scheduled maintenance	950		130		125	65	440		115					Exhibition Road general/scheduled maintenance	92%	75	875
Exhibition Road water/water maintenance and repairs	750							366			218			Exhibition Road water/water maintenance and repairs	78%	166	584
Barnfield general/scheduled maintenance	900		220			125			85		175			Barnfield general/scheduled maintenance	67%	295	605
Barnfield water/water maintenance and repairs	750					277					253			Barnfield water/water maintenance and repairs	71%	220	530

Moffats general/scheduled maintenance	200													Moffats general/scheduled maintenance		200	
Moffats water/water maintenance and repairs	500				89			237						Moffats water/water maintenance and repairs	65%	174	326
Boniface Allotments Association fees	300										127			Boniface Allotments Association fees	42%	173	127
Property and Assets														Property and Assets			
Peoples Park maintenance	3,000						700		220		30		740	Peoples Park maintenance	56%	1,310	1,690
Peoples Park grass cutting	3,000		480		410	410		205	615		205			Peoples Park grass cutting	78%	675	2,325
Peoples Park Memorial Garden	1,250										687		200	Peoples Park Memorial Garden	71%	364	887
Peoples Park Wildlife Area	250												250	Peoples Park Wildlife Area	100%	-	250
Upper Deck general maintenance and cleaning	500		100			25				55		110		Upper Deck general maintenance and cleaning	58%	210	290
Bandstand electricity	250			3	3		5					0		Bandstand electricity	4%	239	11
Bandstand cleaning and general maintenance	750													Bandstand cleaning and general maintenance		750	
War Memorial netting	-													War Memorial netting		-	
War Memorial cleaning and general maintenance	350												346	War Memorial cleaning and general maintenance	99%	4	346
Street Furniture general maintenance (Increase from EMR by £500 as per FC)	2,000							755			158		1,009	Street Furniture general maintenance	96%	79	1,921
Street Furniture bus shelter maintenance	-													Street Furniture bus shelter maintenance		-	
Town Clock	750												260	Town Clock	35%	490	260
Stoney Park maintenance	750		400											Stoney Park maintenance	53%	350	400
Boniface Statue maintenance and cleaning	350												160	Boniface Statue maintenance and cleaning	46%	190	160
Millenium Cross maintenance and cleaning	150													Millenium Cross maintenance and cleaning		150	
Garage rental	1,850			910						910				Garage rental	98%	30	1,820
Public open spaces (SPG & Fulda Crescent)	1,500		305		105	95					275	120		Public open spaces (SPG & Fulda Crescent)	60%	600	900
Newcombes Meadow toilets water	500	20	27	27	27	27	70	27	34	34	25			Newcombes Meadow toilets water	64%	182	318
Newcombes Meadow toilets electricity	600	9	47	45	45	45	46	37	37	49	49	50	9	Newcombes Meadow toilets electricity	78%	131	469
Newcombes Meadow toilets supplies & repairs	400	100										263		Newcombes Meadow toilets supplies & repairs	91%	37	363
Newcombes Meadow toilets door locking	200										258			Newcombes Meadow toilets door locking	129%	58	258
Old Landscore School electricity	1,000	33	32	39	38	38	38			34	41	34	36	Old Landscore School electricity	36%	637	363
Old Landscore School equipment	500													Old Landscore School equipment		500	
Old Landscore School water charges	400	(38)	38		55					52		44		Old Landscore School water charges	38%	249	151
Old Landscore School telephone/broadband	-													Old Landscore School telephone/broadband		-	
Old Landscore School maintenance	2,000										100	30		Old Landscore School maintenance	7%	1,870	130
Old Landscore School business rates	4,000			2,970						544				Old Landscore School business rates	88%	486	3,514
Old Landscore School insurance	-													Old Landscore School insurance		-	
Annual QTRA	1,000						1,153							Annual QTRA	115%	153	1,153
Additional tree works	3,000							550					2250	Additional tree works	93%	200	2,800
Town maintenance contract	13,000		1,146	1,194	1,335	1,478	1,305	20	2,906	790	744	776	761	Town maintenance contract	96%	545	12,455
General Small works	3,000	150		77		150	1,996	500			60			General Small works	98%	67	2,933
CCTV	11,000			2,630	150			3,664					301	CCTV	61%	4,255	6,745
Council Offices														Council Offices			
Bungalow rent & costs	15,000	833	3,296	2,242	2,710	2,242	2,242	450			298			Bungalow rent & costs	95%	687	14,313
Main office rent (Inc from EMR £7,041.65 as per FC)	14,542						6,039		1,408	1,408	1,408	1,408	1,408	Main office rent	100%	55	14,487
Electricity	2,500	138	194	154	438	151	420	59			226			Electricity	71%	719.83	1,780
Water	400	19	21	26	19	25	12	18		24	25	52	27	Water	67%	131	269
Fire Extinguishers	350	43												Fire Extinguishers	12%	307	43
General Premises Maintenance	500				115		117	150				25		General Premises Maintenance	81%	93	407
Business rates	3,500	323	319	638	319	319				1,266				Business rates	91%	316	3,184
Refreshments	120		7	3	10		14	18	3		1		40	Refreshments	80%	24	96
Floral Crediton														Floral Crediton			

Plants/Flowers	2,500			1,542	84			272		346			37	Plants/Flowers	91%	219	2,281
Awards Evening	100							20	33					Awards Evening	53%	47	53
Hanging baskets/troughs & watering	7,000				3,332			3332						Hanging baskets/troughs & watering	95%	336	6,664
Other Floral costs	500				60		38			7				Other Floral costs	21%	395	105
New planters (replacements)	1,000													New planters (replacements)		1,000	
Christmas in Crediton														Christmas in Crediton			
Repeat Costs	13,500						207	240	235	7,073	1,350		1,660	Repeat Costs	80%	2,735	10,765
Community Participation	7,500							408	1,997	3,673		50		Community Participation	82%	1,372	6,128
New Infrastructure	4,000								1,451					New Infrastructure	36%	2,549	1,451
Miscellaneous	1,000													Miscellaneous		1,000	
VE Day														VE Day			
General expenditure - events (transfer from EMR)	4,505		2,736	1,664	240	336								General expenditure - events	110% -	471	4,976
Big Boniface Bash														Big Boniface Bash			
General expenditure - events (transfer from EMR)	5,009			2,731	1,855						500			General expenditure - events	102% -	77	5,086
Crediton Food Festival														Crediton Food Festival			
General expenditure - events (transfer from EMR)	3,088		384	20	3,150	3,248	40				349			General expenditure - events	233% -	4,103	7,191
VI Day														VI Day			
General expenditure - events (transfer from EMR)	2,480					290	75						150	General expenditure - events	21%	1,965	515
Additional Services														Additional Services			
DCC grass cutting	5,000												3,000	DCC grass cutting	60%	2,000	3,000
Youth Work*	6,000	300	82	30	1,050	58	211	1,417	583	119	515	1,603	1,111	Youth Work*	118% -	1,079	7,079
Annual grants to community groups	50,000	42,225									700	3,000	1,200	Annual grants to community groups	98%	864	49,136
Crediton Urban Taskforce	500												146	Crediton Urban Taskforce	29%	354	146
Budget Spend	508,383	66,614	35,036	37,272	36,532	36,473	31,090	38,183	32,356	40,930	30,106	25,130	39,882	Budget Spend	88%	58,779	449,604

EXPENDITURE: Ear Marked Reserves*	Budget													EXPENDITURE: Ear Marked Reserves**				
EMR 370: VE Day	-	475												EMR 370: VE Day				
EMR 349: St Boniface/Devon Day	-	1,060												EMR 349: St Boniface/Devon Day				
EMR 334: Allotments			1,180						1,200					EMR 334: Allotments				
EMR 328: Premises			440					6,335					1,394	EMR 328: Premises				
EMR 338: Council Building Fund				4,000	1,000	1,800							3,450	EMR 338: Council Building Fund				
EMR 336: Localism Projects				4,900									98	EMR 336: Localism Projects				
EMR 371: VI Day				20										EMR 371: VI Day				
EMR 320: Elections							16,702							EMR 320: Elections				
EMR 327: Upper Deck							350							EMR 327: Upper Deck				
EMR 344: OLS project									800			900		EMR 344: OLS project				
EMR 367: LA Services											12,000			EMR 367: LA Services				
EMR 339: IT equipment/support												1,314		EMR 339: IT equipment/support				
EMR 322: Street Furniture/Small Work													100					
Sub Total		1,535	1,620	8,920	1,000	1,800	17,052	6,335	2,000		12,000	2,214	5,042	Sub Total				
Total Spend inc reserves	508,383	68,149	36,656	46,192	37,532	38,273	48,142	44,518	34,356	40,930	42,106	27,344	44,924	Total Spend inc reserves	100%	-	738	509,122

INCOME	Budget													INCOME	%Budget	Balance	Total Income
Precept	510,750	255,375						255,375						Precept	100%	-	510,750
Interest received	18,000	1,837	2,153	2,168	2,078	2,772	2,075	1,977	2,080	2,260	2,299	2,243	2,014	Interest received	144%	- 7,956	25,956

Youth grants received	10,000	5,000					4,900				1,000			Youth grants received	109%	-	900	10,900
Youth donations received		131	102	239	173	7	79	35	29	36	112	15	364	Youth donations received				
Allotment rent & BAA membership	4,000	(35)	18	56	6		2,528	1,508	428	346	70	28	33	Allotment rent & BAA membership	125%	-	986	4,986
Other income: wayleave	15		19											Other income: wayleave	127%	-	4	19
Room hire fees received			72	42			72	188			188			Room hire fees received				562
Other income: Newcombes toilet survey		1,100												Other income: Newcombes toilet survey				1,100
Other income: Food Festival transfer		340												Other income: Food Festival transfer				340
Grants received: Cluster meetings			250											Grants received: Cluster meetings				250
Big Boniface Bash: Stallholder fees received			100	365										Big Boniface Bash: Stallholder fees received				465
Big Boniface Bash: Sponsorship received			500											Big Boniface Bash: Sponsorship received				500
VE Day: Donations received			190											VE Day: Donations received				190
Grants received: Event barriers				120										Grants received: Event barriers				120
Donations received: CCTV				1,000										Donations received: CCTV				1,000
Crediton Food Festival: Stallholder fees received				1,600	1,685	50								Crediton Food Festival: Stallholder fees received				3,335
Crediton Food Festival: Sponsorship received					1,000		300							Crediton Food Festival: Sponsorship received				1,300
Gazebo hire fees						80				40				Gazebo hire fees				120
VJ Day: Donations received								100						VJ Day: Donations received				100
Grass cutting contribution								884						Grass cutting contribution				884
Christmas in Crediton: Stallholder fees received									658		92			Christmas in Crediton: Stallholder fees received				750
Christmas in Crediton: Sponsorship received											400			Christmas in Crediton: Sponsorship received				400
Other income: War Memorial contribution											200			Other income: War Memorial contribution				200
Sub Total	542,765	263,748	3,404	5,590	4,942	2,909	9,954	260,067	3,195	2,682	4,361	2,286	2,411	Sub Total				565,549
INCOME: Ear Marked Reserves	Budget													INCOME: Ear Marked Reserves				
370: VE Day	-	380												370: VE Day				380
EMR: P3 Parish Paths										220								
Sub Total		380								220				Sub Total				600
Total Income Inc reserves	542,765	264,128	3,404	5,590	4,942	2,909	9,954	260,067	3,195	2,902	4,361	2,286	2,411	Total Income Inc reserves				566,149

Please see EMR tab for net movement of EMRs

YOUTH ACCOUNTS 25/26

			CTC budget	Subs	Grant	Grant	Grant	EMR 366:	EMR 365:	EMR 373:
					PCC Grant Girls Group (April 2025)	DYS Space (Sept 2025)	DCC Places To Go Grant (Jan 2026)	Underspend 2024-25	PCC Grant - Girls Group	Youth subs 2024-25
			£6,000.00	£1,057.72	£5,000.00	£4,900.00	£1,000.00	£1,609.15	£176.11	£2,045.07
Date	Description	Supplier								
01/04/2025	Mobile phone bill	EE Ltd	£17.26							
01/04/2025	Youth hoodies	WestPrint	£175.75							
02/04/2025	Refreshments	Morrisons		£39.96						
10/04/2025	Refreshments	Morrisons		£5.10						
10/04/2025	Power bank	Tesco	£20.00							
11/04/2025	Card game	Adams	£11.66							
16/04/2025	Train tickets - music event	Great Western Railway	£16.35							
23/04/2025	Refreshments	Spar		£8.93						
30/04/2025	Refreshments	Tesco		£5.38						
02/05/2025	Mobile phone bill	EE Ltd	£17.26							
07/05/2025	Refreshments	Spar		£7.28						
07/05/2025	Refreshments	Tesco		£13.80						
21/05/2025	Refreshments	Lidl		£4.65						
21/05/2025	Refreshments	Tesco		£37.92						
02/06/2025	Mobile phone bill	EE Ltd	£18.36							
05/06/2025	Refreshments	Spar		£1.45						
25/06/2025	Refreshments	Spar		£2.75						
25/06/2025	Refreshments	Morrisons		£7.68						
01/07/2025	Refreshments	C Kelly (expenses)		£3.00						
02/07/2025	Mobile phone bill	EE Ltd	£18.36							
16/07/2025	Refreshments	Spar		£5.89						
16/07/2025	Groceries	Asda		£65.64						
16/07/2025	T-shirts	Buytshirtsonline	£48.09							
23/07/2025	Refreshments	Spar		£7.78						
23/07/2025	Groceries	Asda		£34.53						
23/07/2025	Planning permission - totem pole	Planning Portal	£234.00							
23/07/2025	Hartland Trip	Skern Lodge Ltd	£500.00							
23/07/2025	Refund - groceries	Asda		-£1.04						
23/07/2025	Refund - groceries	Asda		-£6.86						
25/07/2025	Hartland Trip - train tickets	Great Western Railway	£94.50							
28/07/2025	Craft supplies	Hobbii	£18.63							
30/07/2025	Park Fun refreshments	Morrisons	£27.03							
01/08/2025	Mobile phone bill	EE Ltd	£17.90							
06/08/2025	Refreshments	Morrisons		£10.13						
13/08/2025	Refreshments	Spar		£2.85						
19/08/2025	Facepaint	E Anderson (Amazon)	£27.61							
01/09/2025	Mobile phone bill	EE Ltd	£18.00							
12/09/2025	GG supplies	Spar			£2.00					
12/09/2025	GG supplies	Spar			£3.30					
12/09/2025	GG equipment	Tesco			£45.00					

12/09/2025	Refreshments	Tesco		10.12						
26/09/2025	Refreshments	Spar		8.53						
30/09/2025	Panto tickets	CODS	£124.00							
01/10/2025	Mobile phone bill	EE Ltd	£18.00							
02/10/2025	Child Protection Training G2	VOYC Devon	£60.00							
02/10/2025	Child Protection Training G5	VOYC Devon	£80.00							
02/10/2025	Child Protection Training G5	VOYC Devon	£80.00							
02/10/2025	Room hire - Lords Meadow	MDDC	£450.00							
06/10/2025	Fancy dress supplies	Vinted		£4.57						
06/10/2025	Fancy dress supplies	Vinted		£6.67						
06/10/2025	Fancy dress supplies	Vinted		-£4.57						
10/10/2025	GG supplies	Tesco			£42.43					
10/10/2025	Boxing intervention	Bang Bang Boxing			£500.00					
15/10/2025	Youth supplies	C Kelly (expenses)			£18.29					
15/10/2025	DBS Check - I G	Devon County Council	£60.00							
20/10/2025	Fancy dress supplies	Vinted		£5.09						
27/10/2025	GG refreshments	C Kelly (expenses)			£21.41					
27/10/2025	Room hire - Lords Meadow	MDDC	£75.00							
03/11/2025	Mobile phone bill	EE Ltd	£18.00							
06/11/2025	DBS Check - A M	Devon County Council	£10.50							
14/11/2025	GG supplies	Tesco			£48.23					
21/11/2025	Christmas craft	Baker Ross			£50.58					
21/11/2025	Room hire - Tea Rooms	Turning Tides	£106.00							
28/11/2025	Summer graffiti project	Olas Art	£350.00							
03/12/2025	Mobile phone bill	EE Ltd	£18.00							
16/01/2025	GG refreshments	Tesco			£35.53					
17/12/2025	Supplies	Adams		£1.99						
17/12/2025	GG refreshments	D Saunders (expenses)			£42.05					
22/12/2025	GG refreshments	C Kelly (expenses)			£21.73					
02/01/2026	Mobile phone bill	EE Ltd	£18.00							
06/01/2026	Room Hire	Arts Centre	£96.00							
08/01/2026	Refreshments - interviews	Morrisons	£8.14							
09/01/2026	GG refreshments	Lidl			£7.33					
09/01/2026	Craft supplies	Baker Ross			£88.79					
14/01/2026	Room Hire	Libraries Unlimited	£25.00							
16/01/2026	GG supplies	Tesco			£70.32					
19/01/2026	Stationery/supplies	Tesco		6.95						
21/01/2026	Equipment	B&Q	£98.24							
27/01/2026	Room Hire	Libraries Unlimited	£37.50							
27/01/2026	Room Hire	Libraries Unlimited	£50.00							
29/01/2026	GG refreshments	Morrisons			£8.66					
02/02/2026	Mobile phone bill	EE Ltd	£18.00							
06/02/2026	GG supplies	Spar			£16.09					
12/02/2026	Safeguarding training	VOYC Devon	£315.00							

12/02/2026	Refreshments - Weds	Spar		£5.50						
13/02/2026	GG refreshments	Morrisons			£5.25					
13/02/2026	Refreshments - Weds	Tesco		£31.65						
13/02/2026	Refreshments - Weds - Refund	Tesco		-1.55						
16/02/2026	Youth supplies	Baker Ross	87.79							
24/02/2026	iPad	Nexus	£340.79							
24/02/2026	Laptop	Nexus	£747.83							
24/02/2026	GG refreshments	C Kelly (expenses)			£15.20					
26/02/2026	Refreshments - Weds	Morrisons		10.49						
27/02/2026	GG refreshments	Tesco			£11.22					
04/03/2026	Mobile phone bill	EE Ltd	£18.00							
05/03/2026	Refreshments - Weds	Spar		2.29						
05/03/2026	Refreshments - Weds	Morrisons		2.5						
06/03/2026	GG refreshments	Tesco			£41.39					
06/03/2026	Room hire	Libraries Unlimited	£15.00							
06/03/2026	Room hire	Libraries Unlimited	£66.25							
06/03/2026	Room hire	Libraries Unlimited	£50.00							
06/03/2026	Room hire	Libraries Unlimited	£50.00							
06/03/2025	Youth workshop	The Makers Boutique	£150.00							
05/03/2026	DBS check - ZC JS FP	Devon County Council	£186.45							
05/03/2026	Laptop & iPad services	Nexus	£350.00							
09/03/2026	Refreshments - Weds	Morrisons		£3.18						
12/03/2026	Stationery/supplies	Tesco			£33.40					
13/03/2026	GG refreshments	Spar			£5.00					
17/03/2026	Room Hire	Crediton Arts Centre	£96.00							
20/03/2026	GG refreshments	Tesco			£7.65					
27/03/2026	GG supplies	Refurnish			£3.00					
27/03/2026	Refreshments easter quiz	Morrisons			£31.37					
Creditor 25-26	Room hire	Crediton Arts Centre	£168.00							
Accural 25-26	Boxing intervention	Bang Bang Boxing			£500.00					
Creditor 25-26	Room hire 10/03 £TBC	Boniface Centre	£120.00							
Creditor 25-26	Room hire	Libraries Unlimited	£111.25							
	EMR transfer				-£176.11				£176.11	
Total spent:			£5,953.50	£350.23	£1,499.11	£0.00	£0.00	£0.00	£176.11	£0.00
	Salaries				£3,500.00	£4,900.00				
Remaining:			£46.50	£707.49	£0.89	£0.00	£1,000.00	£1,609.15	£0.00	£2,045.07

	Earmarked Reserves	Balance as 1 April 2025	April income*	April Expenditure	May Expenditure	June Expenditure	July Expenditure	Aug Expenditure	Sept Expenditure	Oct Expenditure	Nov Expenditure	Dec Income	Jan Expenditure	Feb Expenditure	Mar Expenditure	Mar Income	Current balance
320	EMR - Elections	15,000.00	2,500.00						-16,702.13								797.87
321	EMR - Citizen Badges	500.00															500.00
322	EMR - St.Furniture/Small Work	4,479.26	20.74										-500.00		-100.00		3,900.00
323	EMR - Economic Development	10,000.00															10,000.00
324	EMR - P3 Parish Paths	1,966.17	3.83									220.00					2,190.00
325	EMR - Floral Crediton	2,344.00	166.00														2,510.00
326	EMR - Town Clock	1,000.00															1,000.00
327	EMR - Upper Deck	960.00	40.00						-350.00								650.00
328	EMR - Premises	13,950.00	1,050.00		-439.95					-6,335.00					-1,394.42		6,830.63
329	EMR - CCTV	25,000.00															25,000.00
330	EMR - Boniface Statue	9,780.00	220.00														10,000.00
331	EMR - War Memorial	9,994.00	6.00														10,000.00
332	EMR - Band Stand	10,600.00															10,600.00
333	EMR - Mayors Chain	1,000.00															1,000.00
334	EMR - Allotments	11,936.09	44.00		-1,180.09						-1,200.00						9,600.00
335	EMR - Neighbourhood Planning	3,749.00	51.00														3,800.00
336	EMR - Localism Projects	25,000.00	10,000.00			-4,900.00									-97.50		30,002.50
337	EMR - General Legal/Prof Fees	6,821.00	179.00								-1,500.00						5,500.00
338	EMR - Council Building Fund	199,933.99	15,000.00			-4,000.00	-1,000.00	-1,800.00			-7,041.65				-3,450.00		197,642.34
339	EMR - IT Equipment/Support	5,979.01	20.99											-1,314.14			4,685.86
340	EMR - Staffing Costs	15,000.00															15,000.00
341	EMR - Newcombes Meadow Money	6,732.00	18.00														6,750.00
342	EMR - Tree Works	3,000.00															3,000.00
343	EMR - FP19 - Repairs																0.00
344	EMR - OLS Project	21,000.00	5,000.00								-800.00			-900.00			24,300.00
345	EMR - Christmas in Crediton	9,830.00	170.00														10,000.00
346	EMR - Grants	5,843.30															5,843.30
347	EMR - Civilian Flag Bearer	356.80	43.20														400.00
348	EMR - Salt Spreader	165.00	10.00														175.00
349	EMR - St Boniface/Devon Day	6,058.38	10.37	-1,060.00	-5,008.75												0.00
351	EMR - DCC Feasibility study	190.00															190.00
352	EMR - PP Wildlife Area	130.00															130.00
353	EMR - Defibrillator Project																-
354	EMR - Xmas Lights Ren/Repairs	708.20	291.80														1,000.00
356	EMR - Incredible Edibles TS																-
357	EMR - Allotment Access Project	877.56	2.44														880.00
358	EMR - Traffic & Urban Realm FS																-
359	EMR - Diversity Festival	750.00															750.00
360	EMR - P3 Tinpot Handrail																0.00
361	EMR - Tinpot Lane																0.00
362	EMR - Benches	4,652.00	98.00														4,750.00
363	EMR - Fingerpost	141.52	8.48														150.00
364	EMR - Project Initiation Fund	9,000.00															9,000.00
365	EMR - Youth PCC Grant	176.11													-176.11		0.00
366	EMR - Youth underspend 24/25	1,609.15															1,609.15
367	EMR - LA Services	45,000.00	24,000.00										-12,000.00				57,000.00
368	EMR - Telephone box	2,500.00															2,500.00
369	EMR - Food Festival	3,088.04			-3,088.04												0.00
370	EMR - VE Day	4,600.00	380.00	-475.00	-4,505.00												0.00
371	EMR - VJ Day	2,500.00				-19.99	-2,480.01										0.00
372	EMR - Love Your Town Centre	582.00															582.00
373	EMR - Youth subs	2,045.07															2,045.07
374	EMR - Youth Places To Go Grant															1,000.00	1,000.00
		506,527.65	59,333.85	-1,535.00	-14,221.83	-8,919.99	-3,480.01	-1,800.00	-17,052.13	-6,335.00	-10,541.65	220.00	-12,500.00	-2,214.14	-5,218.03	1,000.00	483,263.72

*EMRs increased as approved in 25/26 budget

Crediton Town Council Forecast for 2026 / 2031					
approved on					
	Budget	Forecast	Forecast	Forecast	Forecast
	2026-27	2027-28	2028-29	2029-30	2030-2031
Balance brought forward	(331,000)	(315,439)	(311,120)	(311,773)	(331,668)
EXPENDITURE					
Salaries	252,500	261,338	269,178	277,253	285,571
Administration	29,275	30,300	31,209	32,145	33,109
Council & Councillors	28,090	29,073	29,945	30,844	31,769
Allotments	5,150	5,408	5,678	5,962	6,260
Property & Assets	59,850	61,945	63,803	65,717	67,689
Council Offices	27,880	28,856	29,721	30,613	31,532
Floral Crediton	11,650	12,058	12,419	12,792	13,176
Christmas in Crediton	26,500	27,428	28,250	29,098	29,971
Insurance	6,100	6,405	6,725	7,062	7,415
Events	12,000	12,600	13,230	13,892	14,586
Annual Grant Funding	54,500	57,225	60,086	63,091	66,245
Additional services	11,500	12,075	12,679	13,313	13,978
Sub Total	524,995	544,709	562,924	581,780	601,300
CHANGE TO EARMARKED RESERVES					
Sub Total	68,085	64,163	69,000	63,000	63,000
TOTAL EXPENDITURE	593,080	608,872	631,924	644,780	664,300
INCOME					
Interest	(18,000)	(17,468)	(16,544)	(18,237)	(19,784)
Youth grants	(10,000)	(10,000)	(10,000)	(10,000)	(10,000)
Allotment rents	(4,500)	(4,815)	(5,152)	(5,513)	(5,899)
Miscellaneous	(19)	(19)	(19)	(19)	(19)
Sub Total	(32,519)	(32,302)	(31,715)	(33,769)	(35,701)
Precept	(545,000)	(572,250)	(600,863)	(630,906)	(662,451)
TOTAL INCOME	(577,519)	(604,552)	(632,577)	(664,675)	(698,152)
DEFICIT /(SURPLUS)	15,561	4,319	(653)	(19,895)	(33,853)

Balance carried forward **(315,439) (311,120) (311,773) (331,668) (365,520)**

Months of cover 8.9 8.4 8.2 8.5 9.1

Calc for cover

426,845	442,049	455,680	469,738	484,238
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Simple precept increase

4.68% 4.64% 5.07% 5.04%



CREDITON TOWN COUNCIL

Reserves Report

Report by: Deputy Clerk
To: Full Council
Date: For consideration on 21 April 2026

Recommendation

Full Council is requested to consider and approve the proposals regarding Earmarked Reserves and General Reserves.

1. Purpose

- 1.1 This report provides recommendations in relation to General Reserves and Earmarked Reserves, as specified below.

2. Background

- 2.1 Due to revised valuations, the business rates bills for Manor Office and Old Landscore School exceed the budget allocated for 26-27, therefore an overspend is required.
- 2.2 A youth grant of £1,000 was moved to EMR at the end of 2025-26 to ringfence the grant. The grant is due to be spent this year, therefore it would be prudent to transfer these funds back into the main youth budget for 26-27 to enable it to be spent, in line with financial regulations.
- 2.3 An emergency spend of £1,394.42 was incurred to settle an outstanding bill from the previous landlord for electrical works required at 8a & 8 North Street, the bill was due for immediate payment.

3. Proposals

- 3.1 To approve an overspend of £453.58 from the 26/27 Council Offices business rates budget.
- 3.2 To approve an overspend of £316.40 from the 26/27 OLS business rates budget.
- 3.3 To approve the transfer of £1,000 from EMR 374: Youth Places to Go Grant, into the main youth budget.
- 3.4 To retrospectively note the emergency expenditure detailed above, using EMR 328: Premises, in line with Financial Regulations (5.10).

4. Financial Implications

- 4.1. There are no additional financial implications.

5. Climate Implications

- 5.1 There are no climate implications.

6. Conclusion

- 6.1 Full Council is requested to approve the proposals to ensure that the financial management of all transactions is transparent.



CREDITON TOWN COUNCIL

Assertion 10 Action Plan Report

Report by: Town Clerk
To: Full Council
Date: For noting on 17 March 2026

Recommendation

Full Council is requested to review and consider the actions in the below report and approve any measures.

1. Purpose

- 1.1 This report provides a table of required actions, relating to the Internal Auditor's Assertion 10 report, for members to consider and agree a course of action.

2. Background

- 2.1. Credition Town Council (CTC) commissioned a report by the Internal Auditor regarding a review of data, which directly relates to the new requirement of Assertion 10 in the Annual Governance and Accountability Review.

3. Actions for consideration/approval

- 3.1 The following tables refer to actions required:

Transparency and Publication Duties

Required Action	Detail	Responsibility	Status
Note legal exemption from Transparency Code 2015	CTC is exempt under S.I. 2015/480 (Transparency Code does not apply unless income/expenditure below £6.5m)	NA	
Decide whether to voluntarily adopt the Transparency Code	Formal Council decision required. If adopted, implementation plan needed	Full Council	Completed
Clarify website presentation of transparency information	If Code adopted voluntarily, clearly state this and distinguish from ICO Publication Scheme. This will require a separate Publication Scheme	Full Council/Town Clerk	NA
Adopt the ICO Model Publication Scheme	The ICO template for parish councils (Version 3) is recommended as best	Full Council	In place

	practice, which CTC currently has in place		
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Freedom of Information (FOI)

Required Action	Detail	Responsibility	Status
Establish FOI handling procedures	Written process for officers/councillors, including triage, logging, decision-making and exemptions	Town Clerk	For consideration at Full Council on Tuesday 21 May 2026
Implement FOI response tracking	Ensure responses issued within statutory 20 working days; create FOI register	Town Clerk	M365 Planner
Training on FOI vs GDPR	Clarify differences between public information and personal data rights	Members/Town Clerk	Available via DALC

Data Protection (DPA 2018/GDPR)

Required Action	Detail	Responsibility	Status
Identify lawful basis for processing all personal data	Must be identified for each class of data (Consent, Contract, Legal Obligation, Public Task etc.)	Town Clerk	In progress
Acknowledge all forms of personal data	Includes written, audio and visual recordings. Full Council to consider lawful basis for holding such recordings	Full Council/Town Clerk	Members are requested to consider the lawful basis for holding audio recordings (see Appendix A)
Conduct a full data audit	Identify all data held, lawful bases, and GDPR principle compliance	Town Clerk	In progress
Test compliance against the six GDPR principles	Lawfulness, purpose limitation, minimisation, accuracy, retention, security	Town Clerk, for approval by Full Council	In progress
Update retention schedule	Ensure data is held only as long as necessary; implement revised retention & disposal policy	Full Council. Last updated January 2026	Completed
Manage consent properly	Where no lawful basis exists, obtain informed opt-in consent or delete/destroy the data	Town Clerk	In progress

Subject Access Requests (SARs)

Required Action	Detail	Responsibility	Status
Adopt SAR procedure	Includes form, timescales, identification checks, logging and response templates	Town Clerk, Full Council to adopt	or consideration at Full Council on Tuesday 21 May 2026
Provide SAR handling guidance	Clarify rights of individuals; ensure staff understand limits on disclosure	Town Clerk	or consideration at Full Council on Tuesday 21 May 2026

Policies and Documents

Required Action	Detail	Responsibility	Status
Adopt required GDPR policies	Including: Privacy Notice, Data Breach Procedure, Retention & Disposal, Audit Schedule, SAR Forms	Town Clerk	In progress

AGAR Assertion 10

Required Action	Detail	Responsibility
Ensure full compliance before AGAR submission	All actions must be completed ahead of 2025–26 Annual Governance and Accountability Return	Town Clerk

4. Financial Implications

- 4.1 There are no financial implications, however the Town Clerk will prioritise the actions ahead of some other work (delegating to other staff members where appropriate).

5. Climate Implications

- 5.1 There are no climate implications.

6. Conclusion

- 6.1 Full Council is requested to review and consider the report, and agree actions as required.

Email received from Breakthrough Communications regarding audio recordings on 20 March 2026

Hi Rachel,

Apologies for all the bold in this email but it is necessary to convey the emphasis that should be drawn.

First, I am bound to say that you should not be doing this without having **first** decided on a lawful basis to undertake this processing, data protection should be thought about and documented before data is collected!

The things that you need to think about are if you have a lawful basis to do this, and then, how long do you then **need** to keep the data.

Lawful basis and retention are two separate considerations and should be considered on their own merits.

Lets look at lawful basis first.

Of the six lawful bases available, I think we can strike out 3 straight off, you do not have a freely given consent, or a contract with everyone present, and no ones life is in danger if you dont record, so that's Consent, Contract and Vital interest all out of consideration.

What is left is Legal obligation, Public task and Legitimate interest.

Legal obligation - you must have a law that **requires** you to record the meetings.

Public task - you must have a law that **empowers** (but does not compel) you to record the meetings.

Legitimate interest - you must have a separate risk assessment (known as a legitimate interest assessment), to asses if your recording is legitimate, necessary and balances everyone's right to privacy vs your need to record.

I can immediately think of a law that empowers the **public** (not part2) bit of the meeting to be recorded. That is the public bodies (admissions to meetings) act 1960. So for the **public part** of the meeting you would have a public task lawful basis.

Now lets look at retention.

The third data protection principle **requires** that data is kept in a form that identifies persons for **no longer** than is **needed** to fulfill the **original** purpose for which it is gathered.

To my mind the official record of a meeting is the minutes, therefore the minutes have a **need** to be kept for a very long time.

But does a recording? Do you **need** to have every word said, by anyone, every noise, cough, fart? If I was an attendee in your public gallery and you told me that you would record my voice and possibly

image **forever**, I would be rather put out and would commence making strenuous enquiries in distressed tones about what your **need** was to keep my personal data recorded and accessible via the FOI act for the rest of my life.

It would be something I would take to the ICO if not the courts, and I would bet that it would be an argument I would win.

Therefore, I can see a lawful basis, but I cannot see that indefinite retention is **needed**, thus it would **not be** lawful.

Also it's inconceivable to think that you will not run into storage and website capacity problems **very quickly**, so just on a technical standpoint it is flawed thinking.



**CREDITON
TOWN COUNCIL**

STANDING ORDERS

First adopted: 18 October 2011

Last amended: 20 January 2026 (minute no. 2026/401)

Review date: May 2026

Preface

Throughout these standing orders, certain terms are used throughout. These terms and their definitions for the purposes of these Standing Orders are set out below.

The term Council shall mean Crediton Town Council unless otherwise indicated.

‘Chair’ and ‘Vice Chair’ refer to the offices of the Chair and Vice-Chair of Crediton Town Council unless otherwise indicated.

‘Member’ or ‘councillor’ refers, except where the content suggests otherwise, a person elected (whether their election is contested or not) and co-opted onto the council, or a person who is not a Member but who is a member of a committee or a sub-committee or is a member of, and represents the council on any joint committee or joint sub-committee of the council who in law is entitled to vote on any question which falls to be decided at a council, committee or sub-committee meeting.

‘Resolution’ is the legal term for a decision lawfully made by the majority of those present and voting at a council, committee or sub-committee meeting.

‘Financial Regulations’ are the standing orders to regulate and control the financial affairs and accounting procedures of a local council. The financial regulations, as opposed to the standing orders of a council, include most of the requirements relevant to the Responsible Financial Officer.

Some of the standing orders are mandatory because they reflect requirements of Acts of Parliament and subsequent regulations. For ease of reference, the orders or parts of orders concerned are printed in **bold type**.

The standing orders in bold type may not be amended unless the legislation out of which they are born changes.

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1. **RULES OF DEBATE AT MEETINGS**
 - a Motions on the agenda shall be considered in the order that they appear unless the order is changed at the discretion of the Chair of the meeting.
 - b A motion (including an amendment) shall not be progressed unless it has been moved and seconded.
 - c A motion on the agenda that is not moved by its proposer may be treated by the Chair of the meeting as withdrawn.
 - d If a motion (including an amendment) has been seconded, it may be withdrawn by the proposer only with the consent of the seconder and the meeting.
 - e An amendment is a proposal to remove or add words to a motion. It shall not negate the motion.
 - f If an amendment to the original motion is carried, the original motion (as amended) becomes the substantive motion upon which further amendment(s) may be moved.
 - g An amendment shall not be considered unless early verbal notice of it is given at the meeting and, if requested by the Chair of the meeting, is expressed in writing to the Chair.
 - h A councillor may move an amendment to their own motion if agreed by the meeting. If a motion has already been seconded, the amendment shall be with the consent of the seconder and the meeting.
 - i If there is more than one amendment to an original or substantive motion, the amendments shall be moved in the order directed by the Chair of the meeting.
 - j Subject to standing order 1(k), only one amendment shall be moved and debated at a time, the order of which shall be directed by the Chair of the meeting.
 - k One or more amendments may be discussed together if the Chair of the meeting considers this expedient, but each amendment shall be voted upon separately.
 - l A councillor may not move more than one amendment to an original or

substantive motion.

- m The mover of an amendment has no right of reply at the end of debate on it.
- n Where a series of amendments to an original motion are carried, the mover of the original motion shall have a right of reply either at the end of debate on the first amendment or at the very end of debate on the final substantive motion immediately before it is put to the vote.
- o Unless permitted by the Chair of the meeting, a councillor may speak once in the debate on a motion except:
 - i. to speak on an amendment moved by another councillor
 - ii. to move or speak on another amendment if the motion has been amended since they last spoke
 - iii. to make a point of order
 - iv. to give a personal explanation
 - v. to exercise a right of reply.
- p During the debate on a motion, a councillor may interrupt only on a point of order or a personal explanation and the councillor who was interrupted shall stop speaking. A councillor raising a point of order shall identify the standing order which they consider to have been breached or specify the other irregularity in the proceedings of the meeting they are concerned by.
- q A point of order shall be decided by the Chair of the meeting and their decision shall be final.
- r When a motion is under debate, no other motion shall be moved except:
 - i. to amend the motion
 - ii. to proceed to the next business
 - iii. to adjourn the debate
 - iv. to put the motion to a vote
 - v. to ask a person to be no longer heard or to leave the meeting
 - vi. to refer a motion to a committee or sub-committee for consideration
 - vii. to exclude the public and press
 - viii. to adjourn the meeting

- ix. to suspend particular standing order(s) excepting those which reflect mandatory statutory or legal requirements.
- s Before an original or substantive motion is put to the vote, the Chair of the meeting shall be satisfied that the motion has been sufficiently debated and that the mover of the motion under debate has exercised or waived their right of reply.
- t Excluding motions moved under standing order 1(r), the contributions or speeches by a councillor shall relate only to the motion under discussion and shall not exceed 5 minutes without the consent of the Chair of the meeting.

2. **DISORDERLY CONDUCT AT MEETINGS**

- a No person shall obstruct the transaction of business at a meeting or behave offensively or improperly. If this standing order is ignored, the Chair of the meeting shall request such person(s) to moderate or improve their conduct.
- b If person(s) disregard the request of the Chair of the meeting to moderate or improve their conduct, any councillor or the Chair of the meeting may move that the person be no longer heard or be excluded from the meeting. The motion, if seconded, shall be put to the vote without discussion.
- c If a resolution made under standing order 2(b) is ignored, the Chair of the meeting may take further reasonable steps to restore order or to progress the meeting. This may include temporarily suspending or closing the meeting.

3. **MEETINGS GENERALLY**

Full Council meetings	●
Committee meetings	●
Sub-committee meetings	●

- a Meetings shall not take place in premises which at the time of the meeting are used for the supply of alcohol, unless no other premises are available free of charge or at a reasonable cost.
- b The minimum three clear days for notice of a meeting does not include the day on which notice was issued, the day of the meeting, a Sunday, a day of the Christmas break, a day of the Easter break or of a bank holiday or a day appointed for public thanksgiving or mourning.
- c Meetings shall be open to the public unless their presence is prejudicial to the public interest by reason of the confidential nature

of the business to be transacted or for other special reasons. The public's exclusion from part or all of a meeting shall be by a resolution which shall give reasons for the public's exclusion.

- d Members of the public may make representations, answer questions and give evidence at a meeting which they are entitled to attend in respect of the business on the agenda. This will be directed by the Chair of the meeting.
- e The period of time public participation at a meeting in accordance with standing order 3(d) shall not exceed 15 minutes unless directed by the Chair of the meeting.
- f Any non-member of the council being a registered local government elector within Crediton as amended from time to time, or at the discretion of the Chair, may ask a question at a Full Council meeting about any matter relating to the powers and duties of the Council. The questioner must state without discussion the question and to whom it is addressed. A maximum period of 3 minutes will be permitted for any person wishing to ask up to three questions, make a statement or give evidence to the Council. Where two or more persons wish to make a similar statement, a spokesperson should be elected from the group to speak on behalf of all. Where differing views are represented, a maximum of 3 minutes will be permitted for each viewpoint to be heard:
 - i. no non-member shall be entitled to ask more than three questions at any one meeting of the Council;
 - ii. all questions shall be put and answered without discussion
 - iii. the person presiding at the meeting to which a question is made, may respond to the question in such a manner as they at their absolute discretion consider appropriate by giving an oral answer; or by agreeing to use their reasonable endeavours to arrange for a written answer to all questions within ten clear working days of the meeting; or by declining to provide an answer in which event the person presiding at the meeting shall also specify the reason for so declining which shall be minuted
 - iv. should a question be provided to the Town Clerk in writing before noon on the day before the meeting, reasonable endeavours shall be made to provide a response at the meeting where the question is received.
- g Any non-member of the council being a registered local government elector within Crediton as amended from time to time, or at the discretion of the Chair, may ask a question at a Committee or Sub-Committee meeting about any matter relating to matters on the agenda only. The questioner must state without discussion the question and to whom it is addressed. A maximum period of 3 minutes will be permitted for any person wishing to ask up to three

questions, make a statement or give evidence to the Council. Where two or more persons wish to make a similar statement, a spokesperson should be elected from the group to speak on behalf of all. Where differing views are represented, a maximum of 3 minutes will be permitted for each viewpoint to be heard:

- i. no non-member shall be entitled to ask more than three questions at any one meeting of the council
- ii. all questions shall be put and answered without discussion
- iii. the person presiding at the meeting to which a question is made, may respond to the question in such a manner as they at their absolute discretion consider appropriate by giving an oral answer; or by agreeing to use their reasonable endeavours to arrange for a written answer to all questions within ten clear working days of the meeting; or by declining to provide an answer in which event the person presiding at the meeting shall also specify the reason for so declining which shall be minuted
- iv. should a question be provided to the Town Clerk in writing before noon on the day before the meeting, reasonable endeavours shall be made to provide a response at the meeting where the question is received.

h

i In accordance with standing order 3(d), a question shall not require a response at the meeting nor start a debate on the question. The Chair of the meeting may direct that a written or oral response be given. A written response will be provided to the member of public within 10 working days.

j A person shall raise their hand when requesting to speak, except when a person has a disability or is likely to suffer discomfort.

k In accordance with standing order 3(d) and (e), a member of the public shall not speak for more than 3 minutes, unless the Chair permits otherwise.

l A person who speaks at a meeting shall direct their comments to the Chair of the meeting.

m Only one person is permitted to speak at a time. If more than one person wishes to speak, the Chair of the meeting shall direct the order of speaking.

- k Subject to standing order 3(m), a person who attends a meeting is permitted to report on the meeting whilst the meeting is open to the public. To “report” means to film, photograph, make an audio recording of meeting proceedings, use any other means for enabling persons not present to see or hear the meeting as it takes place or later or to report or to provide oral or written commentary about the
-

meeting so that the report or commentary is available as the meeting takes place or later to persons not present.

- l A person present at a meeting may not provide an oral report or oral commentary about a meeting as it takes place without permission.
- m The press shall be provided with reasonable facilities for the taking of their report of all or part of a meeting at which they are entitled to be present. Subject to standing orders which indicate otherwise, anything authorised or required to be done by, to or before the Chair of the Council may in their absence be done by, to or before the Vice-Chair of the Council (if there is one).

- n **The Chair of the Council, if present, shall preside at a meeting. If the**
● **is absent from a meeting, the Vice-Chair of the Council (if there is**
● **one) if present, shall preside. If both the Chair and the Vice-Chair**
● **are absent from a meeting, a councillor as chosen by the councillors**
● **present at the meeting shall preside at the meeting.**

- o **Subject to a meeting being quorate, all questions at a meeting shall**
● **be decided by a majority of the councillors and non-councillors with**
● **voting rights present and voting.**

- p **The Chair of a meeting may give an original vote on any matter put to**
● **the vote, and in the case of an equality of votes may exercise their**
● **casting vote whether or not they gave an original vote.**

See standing orders 5(i) and (j) for the different rules that apply in the election of the Chair of the Council at the annual meeting of the Council.

- q **Unless standing orders provide otherwise, voting on a question shall**
● **be by a show of hands, or other intent to vote. At the request of a**
● **councillor, the voting on any question shall be recorded so as to**
● **show whether each councillor present and voting gave their vote**
● **for or against that question. Such a request shall be made before**
● **moving on to the next item of business on the agenda.**

- r **The minutes of a meeting shall include an accurate record of the**
● **following:**

- i. the time and place of the meeting
- ii. the names of councillors who are present, those who had
 submitted apologies and the names of councillors who were
 absent
- iii. interests that have been declared by councillors and non-
 councillors with voting rights
- iv. the grant of dispensations (if any) to councillors and non-
 councillors with voting rights
- v. whether a councillor or non-councillor with voting rights left the
 meeting when matters that they held interests in were being
 considered
- vi. if there was a public participation session
- vii. the resolutions made.

- s **A councillor or a non-councillor with voting rights who has a**
● **disclosable pecuniary interest or another interest as set out in the**

- Council's code of conduct in a matter being considered at a meeting is subject to statutory limitations or restrictions under the code on their right to participate and vote on that matter.
- t No business may be transacted at a meeting unless at least one-third (four) of the whole number of members of the Council are present and in no case shall the quorum of a meeting be less than three.

See standing order 4d(vi) for the quorum of a committee or sub-committee meeting.

- u If a meeting is or becomes inquorate no business shall be transacted and the meeting shall be closed. The business on the agenda for the meeting shall be adjourned to another meeting.
- v A meeting shall not exceed a period of 2 hours but may be extended by 30 minutes following a resolution of the Council or Committee.
- w Town, District, and County Councillors wishing to submit reports may give succinct verbal reports at the meeting, or must do so in writing to the Proper Officer at least three clear days before the meeting to enable the report to be included with the agenda publication, providing sufficient time for members of the Council to consider the reports' content and ask questions of the councillor at the meeting regards the content, if applicable.

4. COMMITTEES AND SUB-COMMITTEES

- a Unless the Council determines otherwise, a committee may appoint a sub-committee whose terms of reference and members shall be determined by the committee.
- b The members of a committee may include non-councillors unless it is a committee which regulates and controls the finances of the Council.
- c Unless the Council determines otherwise, all the members of an advisory committee and a sub-committee of the advisory committee may be non-councillors.
- d The Council may appoint standing committees or other committees as may be necessary, and:
 - i. shall determine their terms of reference
 - ii. shall determine the number and time of the ordinary meetings of a standing committee up until the date of the next annual meeting of the Council
 - iii. shall permit a committee, other than in respect of the ordinary meetings of a committee, to determine the number and time of its

meetings

- iv. shall, subject to standing orders 4(b) and (c), appoint and determine the terms of office of members of such a committee
 - v. shall permit a committee to appoint its own Chair at the first meeting of the committee
 - vi. shall determine the place, notice requirements and quorum for a meeting of a committee and a sub-committee which, in both cases, shall be no less than three
 - vii. shall determine if the public may participate at a meeting of a committee
 - viii. shall determine if the public and press are permitted to attend the meetings of a sub-committee and also the advance public notice requirements, if any, required for the meetings of a sub-committee
 - ix. shall determine if the public may participate at a meeting of a sub-committee that they are permitted to attend
 - x. may dissolve a committee or a sub-committee.
- e All council members may attend all committee and sub-committee meetings of the council, excluding items discussed in Part II. They cannot vote, but may speak at the discretion of the Chair.

5. **ORDINARY COUNCIL MEETINGS**

- a In an election year, the annual meeting of the Council shall be held on or within 14 days following the day on which the councillors elected take office.
- b In a year which is not an election year, the annual meeting of the Council shall be held on such day in May as the Council decides.
- c If no other time is fixed, the annual meeting of the Council shall take place at 6pm.
- d In addition to the annual meeting of the Council, at least three other ordinary meetings shall be held in each year on such dates and times as the Council decides.
- e The first business conducted at the annual meeting of the Council shall be the election of the Chair and Vice-Chair (if there is one) of the Council.
- f The Chair of the Council, unless they have resigned or becomes

disqualified, shall continue in office and preside at the annual meeting until their successor is elected at the next annual meeting of the Council.

- g The Vice-Chair of the Council, if there is one, unless they resign or becomes disqualified, shall hold office until immediately after the election of the Chair of the Council at the next annual meeting of the Council.**
- h The term of the Chair and Vice-Chair will last no more than two consecutive years.**
- i In an election year, if the current Chair of the Council has not been re-elected as a member of the Council, they shall preside at the annual meeting until a successor Chair of the Council has been elected. The current Chair of the Council shall not have an original vote in respect of the election of the new Chair of the Council but shall give a casting vote in the case of an equality of votes.**
- j In an election year, if the current Chair of the Council has been re-elected as a member of the Council, they shall preside at the annual meeting until a new Chair of the Council has been elected. They may exercise an original vote in respect of the election of the new Chair of the Council and shall give a casting vote in the case of an equality of votes.**
- k Following the election of the Chair of the Council and Vice-Chair (if there is one) of the Council at the annual meeting, the business may include:**
 - i. In an election year, delivery by the Chair of the Council and councillors of their acceptance of office forms unless the Council resolves for this to be done at a later date. In a year which is not an election year, delivery by the Town Mayor of their acceptance of office form unless the Council resolves for this to be done at a later date**
 - ii. Confirmation of the accuracy of the minutes of the last meeting of the Council**
 - iii. Receipt of the minutes of the last meeting of a committee**
 - iv. Consideration of the recommendations made by a committee**
 - v. Review of delegation arrangements to committees, sub-committees, staff and other local authorities**
 - vi. Review of the terms of reference for committees**
 - vii. Appointment of members to existing committees**

- viii. Appointment of any new committees in accordance with standing order 4
- ix. Review and adoption of appropriate standing orders and financial regulations
- x. Review of arrangements (including legal agreements) with other local authorities, not-for-profit bodies and businesses
- xi. Review of representation on or work with external bodies and arrangements for reporting back
- xii. In an election year, to make arrangements with a view to the Council becoming eligible to exercise the general power of competence in the future
- xiii. Review of inventory of land and other assets including buildings and office equipment
- xiv. Confirmation of arrangements for insurance cover in respect of all insurable risks
- xv. Review of the Council's and/or staff subscriptions to other bodies
- xvi. Review of the Council's complaints procedure
- xvii. Review of the Council's policies, procedures and practices in respect of its obligations under freedom of information and data protection legislation (*see also standing orders 11, 20 and 21*)
- xviii. Review of the Council's policy for dealing with the press/media
- xix. Review of the Council's employment policies and procedures
- xx. Review of the Council's expenditure incurred under s.137 of the Local Government Act 1972 or the general power of competence
- xxi. Determining the time and place of ordinary meetings of the Council up to and including the next annual meeting of the Council.

6. **EXTRAORDINARY MEETINGS OF THE COUNCIL, COMMITTEES AND SUB-COMMITTEES**
 - a The Chair of the Council may convene an extraordinary meeting of the Council at any time.
 - b If the Chair of the Council does not call an extraordinary meeting of the Council within seven days of having been requested in writing to do so by two councillors, any two councillors may convene an extraordinary meeting of the Council. The public notice giving the time, place and agenda for such a meeting shall be signed by the two councillors.
 - c The Chair of a committee or a sub-committee may convene an extraordinary meeting of the committee or the sub-committee at any time.
 - d If the Chair of a committee or a sub-committee does not or refuses to call an extraordinary meeting within 7 days of having been requested to do so by 2 members of the committee or the sub-committee, any 2 members of the committee or the sub-committee may convene an extraordinary meeting of the committee or a sub-committee.
7. **PREVIOUS RESOLUTIONS**
 - a A resolution (whether affirmative or negative) shall not be reversed within six months except by a special motion, which requires written notice by at least 6 councillors to be given to the Proper Officer in accordance with standing order 9.
 - b When a motion moved pursuant to standing order 7(a) has been disposed of, no similar motion may be moved for a further six months.
8. **VOTING ON APPOINTMENTS**
 - a Where more than two persons have been nominated for a position to be filled by the Council and none of those persons has received an absolute majority of votes in their favour, the name of the person having the least number of votes shall be struck off the list and a fresh vote taken. This process shall continue until a majority of votes is given in favour of one person. A tie in votes may be settled by the casting vote exercisable by the Chair of the meeting.
9. **MOTIONS FOR A MEETING THAT REQUIRE WRITTEN NOTICE TO BE GIVEN TO THE PROPER OFFICER**
 - a A motion shall relate to the responsibilities of the meeting for which it is tabled and in any event shall relate to the performance of the Council's statutory functions, powers and obligations or an issue which specifically

affects the Council's area or its residents. It shall not relate to any matter which may be considered under the Council's Code of Conduct, Complaints Procedure or employment policies.

- b No motion may be moved at a meeting unless it is on the agenda and the mover has given written notice of its wording to the Proper Officer at least 8 clear days before the meeting. Clear days do not include the day of the notice or the day of the meeting.
- c The Proper Officer may, before including a motion on the agenda received in accordance with standing order 9(b), correct obvious grammatical or typographical errors in the wording of the motion.
- d If the Proper Officer considers the wording of a motion received in accordance with standing order 9(b) is not clear in meaning, the motion shall be rejected until the mover of the motion resubmits it, so that it can be understood, in writing, to the Proper Officer at least 10 clear days before the meeting.
- e If the wording or subject of a proposed motion is considered improper, the Proper Officer shall consult with the Chair of the forthcoming meeting or, as the case may be, the councillors who have convened the meeting, to consider whether the motion shall be included in the agenda or rejected.
- f The decision of the Proper Officer as to whether or not to include the motion on the agenda shall be final.
- g Motions received shall be recorded and numbered in the order that they are received.
- h Motions rejected shall be recorded with an explanation by the Proper Officer of the reason for rejection.

10. **MOTIONS AT A MEETING THAT DO NOT REQUIRE WRITTEN NOTICE**

- a The following motions may be moved at a meeting without written notice to the Proper Officer:
 - i. to correct an inaccuracy in the draft minutes of a meeting
 - ii. to move to a vote
 - iii. to defer consideration of a motion
 - iv. to refer a motion to a particular committee or sub-committee
 - v. to appoint a person to preside at a meeting

- vi. to change the order of business on the agenda
- vii. to proceed to the next business on the agenda
- viii. to require a written report
- ix. to appoint a committee or sub-committee and their members
- x. to extend the time limits for speaking
- xi. to exclude the press and public from a meeting in respect of confidential or other information which is prejudicial to the public interest
- xii. to not hear further from a councillor or a member of the public
- xiii. to exclude a councillor or member of the public for disorderly conduct
- xiv. to temporarily suspend the meeting
- xv. to suspend a particular standing order (unless it reflects mandatory statutory or legal requirements)
- xvi. to adjourn the meeting
- xvii. to close the meeting.

11. **MANAGEMENT OF INFORMATION**

See also standing order 20.

- a **The Council shall have in place and keep under review, technical and organisational measures to keep secure information (including personal data) which it holds in paper and electronic form. Such arrangements shall include deciding who has access to personal data and encryption of personal data.**
- b **The Council shall have in place, and keep under review, policies for the retention and safe destruction of all information (including personal data) which it holds in paper and electronic form. The Council's retention policy shall confirm the period for which information (including personal data) shall be retained or if this is not possible the criteria used to determine that period (e.g. the Limitation Act 1980).**
- c **The agenda, papers that support the agenda and the minutes of a meeting shall not disclose or otherwise undermine confidential information or personal data without legal justification.**

- d Councillors, staff, the Council's contractors and agents shall not disclose confidential information or personal data without legal justification.

12. **DRAFT MINUTES**

Full Council meetings ●
Committee meetings ●
Sub-committee meetings ●

- a If the draft minutes of a preceding meeting have been served on councillors with the agenda to attend the meeting at which they are due to be approved for accuracy, they shall be taken as read.
- b There shall be no discussion about the draft minutes of a preceding meeting except in relation to their accuracy. A motion to correct an inaccuracy in the draft minutes shall be moved in accordance with standing order 10(a)(i).
- c The accuracy of draft minutes, including any amendment(s) made to them, shall be confirmed by resolution and shall be signed by the Chair of the meeting and stand as an accurate record of the meeting to which the minutes relate.
- d If the Chair of the meeting does not consider the minutes to be an accurate record of the meeting to which they relate, they shall sign the minutes and include a paragraph in the following terms or to the same effect:

“The Chair of this meeting does not believe that the minutes of the meeting of the () held on [date] in respect of () were a correct record but their view was not upheld by the meeting and the minutes are confirmed as an accurate record of the proceedings.”

- e **If the Council's gross annual income or expenditure (whichever is higher) does not exceed £25,000, it shall publish draft minutes on a website which is publicly accessible and free of charge not later than one month after the meeting has taken place.**
-
-
- f Subject to the publication of draft minutes in accordance with standing order 12(e) and standing order 21(a) and following a resolution which confirms the accuracy of the minutes of a meeting, the draft minutes or recordings of the meeting for which approved minutes exist shall be destroyed.
- g The Council will endeavour to publish the minutes of a meeting within 7 working days after the meeting to which the minutes relate.

13. **CODE OF CONDUCT AND DISPENSATIONS**
See also standing order 3(s).
- a All councillors and non-councillors with voting rights shall observe the code of conduct adopted by the Council.
 - b Unless they have been granted a dispensation, a councillor or non-councillor with voting rights shall withdraw from a meeting when it is considering a matter in which they have a disclosable pecuniary interest. They may return to the meeting after it has considered the matter in which they had the interest.
 - c Unless they have been granted a dispensation, a councillor or non-councillor with voting rights shall withdraw from a meeting when it is considering a matter in which they have another interest if so required by the Council's code of conduct. They may return to the meeting after it has considered the matter in which they had the interest.
 - d **Dispensation requests shall be in writing and submitted to the Proper Officer** as soon as possible before the meeting.
 - e A decision as to whether to grant a dispensation shall be made by a meeting of the Council, or committee or sub-committee for which the dispensation is required and that decision is final.
 - f A dispensation request shall confirm:
 - i. the description and the nature of the disclosable pecuniary interest or other interest to which the request for the dispensation relates
 - ii. whether the dispensation is required to participate at a meeting in a discussion only or a discussion and a vote
 - iii. the date of the meeting or the period (not exceeding four years) for which the dispensation is sought
 - iv. an explanation as to why the dispensation is sought.
 - g A Councillor who wishes to be granted a dispensation as described above must complete a Crediton Town Council, Dispensation Request Form and forward a signed copy to the Proper Officer as soon as practicable before the meeting of the council, its Committees, sub-committees and working groups where the dispensation is requested. The request will then be considered at the meeting when opened by the Chair.
 - h **A dispensation may be granted in accordance with standing order 13(e) if having regard to all relevant circumstances any of the following apply:**

- i. without the dispensation the number of persons prohibited from participating in the particular business would be so great a proportion of the meeting transacting the business as to impede the transaction of the business;
 - ii. granting the dispensation is in the interests of persons living in the Council's area; or
 - iii. it is otherwise appropriate to grant a dispensation.
- i. A copy of the councillors' request and the decision of the meeting where the request is heard shall be kept with the councillors' Register of Interests.

14. **CODE OF CONDUCT COMPLAINTS**

a Upon notification by the Principal Council that a councillor or non-councillor with voting rights has breached the Council's code of conduct, the Council shall consider what, if any, action to take against them. Such action excludes disqualification or suspension from office.

15. **PROPER OFFICER**

- a The Proper Officer shall be either (i) the Clerk or (ii) other staff member(s) nominated by the Council to undertake the work of the Proper Officer when the Proper Officer is absent.
- b The Proper Officer shall:
 - i. **at least three clear days before a meeting of the council, a committee or a sub-committee:**
 - serve on councillors by delivery or post at their residences or by email authenticated in such manner as the Proper Officer thinks fit, a signed summons confirming the time, place and the agenda
 - Provide, in a conspicuous place, public notice of the time, place and agenda (provided that the public notice with agenda of an extraordinary meeting of the Council convened by councillors is signed by them).

See standing order 3(b) for the meaning of clear days for a meeting of a full council, committee or sub-committee.

Subject to standing order 9, include on the agenda all motions in the order received unless a councillor has given written notice at least 7

days before the meeting confirming their withdrawal of it:

- ii. **convene a meeting of the Council for the election of a new Chair of the Council, occasioned by a casual vacancy in their office**
- iii. **facilitate inspection of the minute book by local government electors**
- iv. **receive and retain copies of byelaws made by other local authorities**
- v. hold acceptance of office forms from councillors
- vi. hold a copy of every councillor's register of interests
- vii. assist with responding to requests made under freedom of information legislation and rights exercisable under data protection legislation, in accordance with the Council's relevant policies and procedures
- viii. receive and send general correspondence and notices on behalf of the Council except where there is a resolution to the contrary
- ix. assist in the organisation of, storage of, access to, security of and destruction of information held by the Council in paper and electronic form subject to the requirements of data protection and freedom of information legislation and other legitimate requirements (e.g. the Limitation Act 1980)
- x. arrange for legal deeds to be executed
(*see also standing order 24*)
- xi. arrange or manage the prompt authorisation, approval, and instruction regarding any payments to be made by the Council in accordance with its financial regulations
- xii. record every planning application notified to the Council and the Council's response to the local planning authority in a book for such purpose
- xiii. arrange for a planning application received by the Council to be referred to the Community Committee within 21 working days of receipt and to facilitate an extraordinary meeting if the nature of a planning application requires consideration before the next Community Committee meeting
- xiv. manage access to information about the Council via the publication scheme

- xv. retain custody of the seal of the Council (if there is one) which shall not be used without a resolution to that effect (*see also standing order 24*).

16. **RESPONSIBLE FINANCIAL OFFICER**

- a The Council shall appoint a member of staff to undertake the work of the Responsible Financial Officer when the Responsible Financial Officer is absent.

17. **ACCOUNTS AND ACCOUNTING STATEMENTS**

- a “Proper practices” in standing orders refer to the most recent version of “Governance and Accountability for Local Councils - a Practitioners’ Guide”.
- b All payments by the Council shall be authorised, approved and paid in accordance with the law, proper practices and the Council’s financial regulations.
- c The Responsible Financial Officer shall supply to each councillor as soon as practicable after 30 June, 30 September and 31 December in each year a statement to summarise:
 - ii. the Council’s receipts and payments (or income and expenditure) for each quarter
 - iii. the Council’s aggregate receipts and payments (or income and expenditure) for the year to date
 - iv. the balances held at the end of the quarter being reported and which includes a comparison with the budget for the financial year and highlights any actual or potential overspends.
- d As soon as possible after the financial year end at 31 March, the Responsible Financial Officer shall provide:
 - i. each councillor with a statement summarising the Council’s receipts and payments (or income and expenditure) for the last quarter and the year to date for information
 - ii. to the Council the accounting statements for the year in the form of Section 2 of the annual governance and accountability return, as required by proper practices, for consideration and approval.
- e The year-end accounting statements shall be prepared in accordance with proper practices and apply the form of accounts determined by the

Council (receipts and payments, or income and expenditure) for the year to 31 March. A completed draft annual governance and accountability return shall be presented to all councillors at least 14 days prior to anticipated approval by the Council. The annual governance and accountability return of the Council, which is subject to external audit, including the annual governance statement, shall be presented to the Council for consideration and formal approval before 30 June.

18. **FINANCIAL CONTROLS AND PROCUREMENT**

- a. The Council shall consider and approve financial regulations drawn up by the Responsible Financial Officer, which shall include detailed arrangements in respect of the following:
 - i. the keeping of accounting records and systems of internal controls
 - ii. the assessment and management of financial risks faced by the Council
 - iii. the work of the independent internal auditor in accordance with proper practices and the receipt of regular reports from the internal auditor, which shall be required at least annually
 - iv. the inspection and copying by councillors and local electors of the Council's accounts and/or orders of payments
 - v. whether contracts with an estimated value below **£30,000** due to special circumstances are exempt from a tendering process or procurement exercise.
- b. Financial regulations shall be reviewed regularly and at least annually for fitness of purpose.
- c. **A public contract regulated by the Public Contracts Regulations 2015 with an estimated value in excess of £30,000 but less than the relevant thresholds in standing order 19(f) is subject to Regulations 109-114 of the Public Contracts Regulations 2015 which include a requirement on the Council to advertise the contract opportunity on the Contracts Finder website regardless of what other means it uses to advertise the opportunity unless it proposes to use an existing list of approved suppliers (framework agreement).**
- d. Subject to additional requirements in the financial regulations of the Council, the tender process for contracts for the supply of goods, materials, services or the execution of works shall include, as a minimum, the following steps:
 - i. a specification for the goods, materials, services or the execution of works shall be drawn up

- ii. an invitation to tender shall be drawn up to confirm (i) the Council's specification (ii) the time, date and address for the submission of tenders (iii) the date of the Council's written response to the tender and (iv) the prohibition on prospective contractors contacting councillors or staff to encourage or support their tender outside the prescribed process
 - iii. the invitation to tender shall be advertised in a local newspaper and in any other manner that is appropriate
 - iv. tenders are to be submitted in writing in a sealed marked envelope addressed to the Proper Officer
 - v. tenders shall be opened by the Proper Officer in the presence of at least one councillor after the deadline for submission of tenders has passed
 - vi. tenders are to be reported to and considered by the appropriate meeting of the Council or a committee or sub-committee with delegated responsibility.
- e. Neither the Council, nor a committee or a sub-committee with delegated responsibility for considering tenders, is bound to accept the lowest value tender.
- f. **Where the value of a contract is likely to exceed the threshold specified by the Government from time to time, the Council must consider whether the contract is subject to the requirements of the current procurement legislation and, if so, the Council must comply with procurement rules. NALC's procurement guidance contains further details.**

19. **HANDLING STAFF MATTERS**

- a A matter personal to a member of staff that is being considered by a meeting of the HR Committee is subject to standing order 11.
- b Subject to the Council's policy regarding absences from work, the Council's most senior member of staff shall notify the Chair of the HR Committee, or in their absence, the Chair of Council, of absence occasioned by illness or other reason and that person shall report such absence to the HR Committee its next meeting.
- c The Chair of the Council and the Chair of the HR Committee shall conduct an annual appraisal of the work of the Town Clerk. A written record shall be kept securely in the council offices.
- d Subject to the Council's policy regarding the handling of grievance matters, the Council's most senior member of staff (or other members of staff) shall contact the Chair of the HR Committee in respect of an informal or formal grievance matter, and this matter shall be reported back and progressed by resolution of the HR Committee.
- e Subject to the Council's policy regarding the handling of grievance matters, if an informal or formal grievance matter raised by a member of Town Council staff relates to the Chair or Vice-Chair of the HR Committee, this shall be communicated to another member of the HR Committee which shall be reported back and progressed by resolution of the HR Committee.
- f Any persons responsible for all or part of the management of staff shall treat as confidential the written records of all meetings relating to their performance, capabilities, grievance or disciplinary matters.

In accordance with standing order 11(a), persons with line management responsibilities shall have access to staff records referred to in standing order 20(f).

20. **RESPONSIBILITIES TO PROVIDE INFORMATION**

See also standing order 22.

- a In accordance with freedom of information legislation, the Council shall publish information in accordance with its publication scheme and respond to requests for information held by the Council.
- b. The Council, shall publish information in accordance with the requirements of the Local Government (Transparency Requirements)

(England) Regulations 2015.

21. **RESPONSIBILITIES UNDER DATA PROTECTION LEGISLATION**

See also standing order 11.

- a The Council may appoint a Data Protection Officer.
- b The Council shall have policies and procedures in place to respond to an individual exercising statutory rights concerning their personal data.
- c The Council shall have a written policy in place for responding to and managing a personal data breach.
- d The Council shall keep a record of all personal data breaches comprising the facts relating to the personal data breach, its effects and the remedial action taken.
- e The Council shall ensure that information communicated in its privacy notice(s) is in an easily accessible and available form and kept up to date.
- f The Council shall maintain a written record of its processing activities.

22. **RELATIONS WITH THE PRESS/MEDIA**

- a Requests from the press or other media for an oral or written comment or statement from the Council, its councillors or staff shall be handled in accordance with the Council's policy in respect of dealing with the press and/or other media.
- b In accordance with the council's policy in respect to dealing with the press, public and/or other media, councillors shall not, in their official capacity, provide oral or written statements, letters or written articles to the press, public or other media.

23. **EXECUTION AND SEALING OF LEGAL DEEDS**

- a A legal deed shall not be executed on behalf of the Council unless authorised by a resolution.
- b Subject to standing order 23(a), the Council's common seal shall alone be used for sealing a deed required by law. It shall be applied by the Proper Officer in the presence of two councillors who shall sign the deed as witnesses.

24. **COMMUNICATING WITH DISTRICT AND COUNTY OR UNITARY COUNCILLORS**

- a An invitation to attend a meeting of the Council shall be sent, together with the agenda, to the ward councillor(s) of the District and County Council representing the area of the Council.

25. **GENERAL POWER OF COMPETENCE**

- a Before exercising the general power of competence, a meeting of the full council shall have passed a resolution to confirm it has satisfied the prescribed statutory criteria required to qualify as an eligible parish council.
- b The council's period of eligibility begins on the date that the resolution understanding order 25(a) above was made and expires on the day before the annual meeting of the council that takes place in a year of ordinary elections.
- c **After the expiry of its preceding period of eligibility, the council continues to be an eligible council solely for the purpose of completing any activity undertaken in the exercise of the general power of competence which was not completed before the expiry of the council's preceding period of eligibility referred to in standing order 25(b).**

26. **UNDUE INFLUENCE ON COUNCILLORS**

- a Canvassing councillors or the members of a committee or sub-committee, directly or indirectly, for appointment to or by the council shall disqualify the candidate from such an appointment. The Proper Officer shall disclose the requirements of this standing order to every candidate. An employee of Crediton Town Council shall not canvass or solicit any councillor(s) in respect of their current employment with the Council for their benefit or gain.
- b A councillor or a member of a committee or sub-committee shall not solicit a person for appointment to or by the council or recommend a person or a current employee of Crediton Town Council for such appointment or for promotion; but, nevertheless, any such person may give a written testimonial of a candidate's ability, experience or character for submission to the council with an application for appointment.

27. **RESTRICTIONS ON COUNCILLOR ACTIVITIES**

Unless duly authorised no councillor shall:

- i. inspect any land and/or premises which the Council has a right or duty to inspect; or
- ii. issue orders, instructions or directions.
- iii. Incur any expenditure on behalf of the council or issue an instruction to incur any expenditure.

28. **CREDITON CLOSED CIRCUIT TELEVISION SYSTEM (CCTV)**

In accordance with CCTV protocols from time to time agreed by Crediton Town Council, members of Crediton Town Council undertake a declaration of confidentiality in respect of information and data to which they have access by virtue of their office as a town councillor and owner of the Crediton CCTV system, and will abide by all legislation on the operation and management of the system from time to time in force.

29. **GRANT OF CREDITON CITIZEN AWARD**

A decision to bestow such the Crediton Citizen Award is required to be made at a meeting of the Council. Additionally, at least two thirds of those present and voting must vote in favour of the proposal to confer the honour.

The rights attached to the award are not stipulated in legislation, therefore, for clarity, this Council will invite them to all civic events. A badge of honour will be presented to the individual.

30. **STANDING ORDERS GENERALLY**

- a All or part of a standing order, except one that incorporates mandatory statutory or legal requirements (in **bold**), may be suspended by resolution in relation to the consideration of an item on the agenda for a meeting.
- b A motion to add to or vary or revoke one or more of the Council's standing orders, except one that incorporates mandatory statutory or legal requirements, shall be proposed by a special motion, the written notice by at least 6 councillors to be given to the Proper Officer in accordance with standing order 9. It will be carried if two-thirds of the councillors at a meeting of the council vote in favour.
- c The Proper Officer shall provide a copy of the Council's standing orders to a councillor as soon as possible.

- d A councillor's failure to observe standing orders more than three times in one meeting may result in them being excluded from the remainder of that meeting in accordance with standing orders.
- e The decision of the Chair of a meeting as to the application of standing orders at the meeting shall be final.



IT and Cyber Security Policy

Introduction

The world we inhabit is changing rapidly. Many people rely on the internet for everyday interactions and transactions. Local councils, including Credition Town Council (CTC) are using an increasing range of technology, from apps and the cloud, to multiple devices and gadgets. The level of threat varies across councils, but all possess information or infrastructure of interest to malicious cyber attackers.

IT and Cyber Security

IT and cyber security is crucial to ensure that services are kept up and running. It is also vital in ensuring the public trust councils with their information.

A cyber attack can have very serious consequences both in terms of disrupting services and damaging a council's reputation.

Types of threat Cybercriminals are generally working for financial gain. Key tools and methods include:

- Malware – malicious software that includes, viruses, trojans, worms or code that could have an adverse impact on an organisation
- Ransomware – these lock victims out of their data or systems and only allow access once money is paid
- Phishing – emails purporting to come from a public agency to extract sensitive information from members of the public
- Hacktivism – hacktivists will generally take over websites or social media accounts to raise the profile of a particular cause
- Insiders – staff may intentionally or unintentionally release sensitive information or data into the public domain. This may not always be malicious, and more often than not is down to human error or a lack of awareness of the risks involved
- Other threats – physical e.g. fire or water damage to equipment, terrorists, and espionage.

Protection Measures

CTC's response to cybersecurity should be appropriate and proportionate to its size and scale and the type of information it holds.

CTC has introduced the following protection measures designed to mitigate its risk from its systems being subjected to a potential attack:

- Antivirus, antimalware, and encryption software
- Device and network firewalls to block unauthorised external access to systems
- Password protection on all devices
- Back up facility for the council's data
- Enhanced email spam filters / anti-spoofing controls
- Subscription to Office 365 and Windows 11 for automatic software updates of key applications, and regular servicing of ICT equipment including other updates
- Staff keep laptops securely locked when away from their desks
- Councillors are provided with devices that are set up with the above measures.

Staff and councillor responsibilities

Employees of the council and serving councillors are not to divulge their user credentials to anyone, including family members.

Employees of the council and serving councillors are not to leave unlocked devices unattended.

Employees of the council and serving councillors should be mindful of the risks involved with cybersecurity and should not share any private data or information to any third party. They should be satisfied that any websites visited while browsing the internet on council devices are legal and safe to use.

The Town Clerk will routinely remind staff about never leaving their computers unlocked and will share on cybersecurity awareness information as appropriate to keep abreast of the latest advice and guidelines.



IT and Data Protection Policy

Introduction

This policy sets out the responsibilities of all elected and co-opted members of Credition Town Council (CTC) in relation to their use of IT systems, handling of personal data, and compliance with data protection legislation.

It sits under and supports CTC's Information & Data Protection Policy and ensures members meet the requirements of UK GDPR, the Data Protection Act 2018, and Audit Assertion 10 obligations.

Scope

This policy applies to all members when carrying out their duties, including:

- Use of council-provided email addresses and IT systems
- Handling of personal data of residents, staff, contractors, or partners
- Storage, sharing, and deletion of council-related information on personal or council devices.

Key Principles

Use of Council Email & Domain

- Members must use their council-owned email address for all CTC business
- Personal email accounts (e.g. Gmail, Hotmail) must not be used for CTC business
- Members must not set up auto-forwarding of CTC emails to personal accounts.

Use of Devices

- Council-owned devices should be used for CTC business
- All members receive a council-owned device, and are required to sign for the device and abide to the rules of their use
- If personal devices (laptops, tablets, smartphones) are used, they must:
 - Be password-protected or secured with biometrics
 - Have up-to-date antivirus protection
 - Be locked when unattended
- Members must always log out of all CTC accounts when not in use.

Handling of Personal Data

- Members must treat all personal data received in their role as confidential.
- Personal data must not be downloaded or stored permanently on personal devices.
- If temporary access is required (e.g. opening an email attachment), it must be deleted as soon as no longer required.
- Hard copies of personal data must be stored securely and destroyed via shredding or by using CTC's confidential waste system.

Data Sharing

- Personal data must only be shared where it is lawful and necessary for CTC business.
- Data must not be shared informally (e.g. WhatsApp, Messenger, personal social media).
- Any request for information should be referred to the Town Clerk for advice.

Data Retention and Deletion

- Members must ensure personal data is not kept longer than necessary.
- Emails and documents containing personal data must be deleted when no longer required for CTC business.
- On leaving office, members must ensure all council-related data is handed back to the Town Clerk and removed from personal devices.

Security & Breach Reporting

- Any loss, theft, or suspected breach of council-related data (digital or paper) must be reported to the Town Clerk immediately.
- Members must co-operate fully with the Town Clerk in investigating and addressing any breach.

Confidential Papers Issued for Meetings

- All confidential papers issued for meetings are issued as part of members' agenda packs, but are not published in the public agenda pack.
- All confidential papers must not be shared or discussed outside of the convened meeting.
- At the end of the meeting, any printed papers should be handed to the Town Clerk of the meeting for secure disposal.

Training and Compliance

- Members must undertake basic GDPR and data protection training at least once per term of office.
- All members must confirm in writing that they have read, understood, and will comply with this policy.
- The Information Commissioner's Office <https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/> has a number of useful modules providing guidance on topics such as:
 - data protection principles
 - security (data protection and cyber)
 - online security and data protection
 - what is personal information.

Enforcement

Failure to comply with this policy may result in:

- Referral to the Monitoring Officer for a potential breach of the Code of Conduct
- Referral to the Information Commissioner's Office if a serious data protection breach occurs.

Name:.....

I confirm that I have read and understood the contents of this policy and agree to adhere to its contents.

Signed:.....

Date:.....



Information and Data Protection Policy

Introduction

In order to conduct its business, services and duties, Crediton Town Council (CTC) processes a wide range of data, relating to its own operations and some which it handles on behalf of partners.

In broad terms, this data can be classified as:

- Data shared in the public arena about the services it offers, its mode of operations and other information it is required to make available to the public
- Confidential information and data not yet in the public arena such as ideas or policies that are being worked on
- Confidential information about other organisations because of commercial sensitivity
- Personal data concerning its current, past and potential employees, councillors, and volunteers
- Personal data concerning individuals who contact CTC for information, to access its services or facilities or to make a complaint

CTC will adopt procedures and manage responsibly all data it handles and will respect the confidentiality of both its own data and that belonging to partner organisations it works with and members of the public. In some cases, it will have contractual obligations towards confidential data, but in addition will have specific legal responsibilities for personal and sensitive information under data protection legislation.

CTC will periodically review and revise this policy in the light of experience, comments from data subjects and guidance from the Information Commissioners Office (ICO).

CTC will be as transparent as possible about its operations and will work closely with public, community, stakeholders and other organisation. Details of information which is routinely available is contained in CTC's Publication Scheme which is based on the National Association of Local Council's (NALC) Model Document.

Protecting Confidential or Sensitive Information

CTC recognises it must, at times, keep and process sensitive and personal information about both employees and the public. It has therefore adopted this policy not only to meet its legal obligations but to ensure high standards.

The General Data Protection Regulation (GDPR) which became law on 25th May 2018 and will, like the Data Protection Act 1998 before it, seek to strike a balance between the rights of individuals and the sometimes, competing interests of those such as CTC with legitimate reasons for using personal information.

This policy is based on the premise that Personal Data must be:

- Processed fairly, lawfully and in a transparent manner in relation to the data subject
- Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes
- Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed
- Accurate and, where necessary, kept up to date
- Kept in a form that permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed

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

Data Protection Terminology Data

Subject: means the person whose personal data is being processed. That may be an employee, prospective employee, associate or prospective associate of CTC or someone transacting with it in some way, or an employee, councillor or volunteer with one of our clients, or persons transacting or contracting with one of our clients when we process data for them.

Personal data: means any information relating to a natural person or data subject that can be used directly or indirectly to identify the person. It can be anything from a name, a photo, and an address, date of birth, an email address, bank details, and posts on social networking sites or a computer IP address.

Sensitive personal data: includes information about racial or ethnic origin, political opinions, and religious or other beliefs, trade union membership, medical information, sexual orientation, genetic and biometric data or information related to offences or alleged offences where it is used to uniquely identify an individual.

Data controller: means a person who (either alone or jointly or in common with other persons) determines the purposes for which and the way any personal data is to be processed.

Data processor: in relation to personal data, means any person (other than an employee of the data controller) who processes the data on behalf of the data controller.

Processing information or data: means obtaining, recording or holding the information or data or carrying out any operation or set of operations on the information or data, including:

- organising, adapting or altering it
- retrieving, consulting or using the information or data
- disclosing the information or data by transmission, dissemination or otherwise making it available
- aligning, combining, blocking, erasing or destroying the information or data. regardless of the technology used.

CTC processes personal data in order to:

- fulfil its duties as an employer by complying with the terms of contracts of employment, safeguarding the employee and maintaining information required by law
- pursue the legitimate interests of its business and its duties as a public body, by fulfilling contractual terms with other organisations, and maintaining information required by law
- monitor its activities including the equality and diversity of its activities
- fulfil its duties in operating the business premises including security
- assist regulatory and law enforcement agencies
- process information including the recording and updating details about its councillors, employees, partners and volunteers
- process information including the recording and updating details about individuals who contact it for information, or to access a service, or make a complaint
- undertake surveys, censuses and questionnaires to fulfil the objectives and purposes of CTC
- undertake research, audit and quality improvement work to fulfil its objects and purposes
- carry out council administration. Where appropriate and governed by necessary safeguards we will carry out the above processing jointly with other appropriate bodies from time to time.

CTC will ensure that at least one of the following conditions is met for personal information to be considered fairly processed:

- The individual has consented to the processing
- Processing is necessary for the performance of a contract or agreement with the individual
- Processing is required under a legal obligation
- Processing is necessary to protect the vital interests of the individual
- Processing is necessary to carry out public functions
- Processing is necessary in order to pursue the legitimate interests of the data controller or third parties.

Particular attention is paid to the processing of any sensitive personal information and CTC will ensure that at least one of the following conditions is met:

- Explicit consent of the individual
- Required by law to process the data for employment purposes
- A requirement in order to protect the vital interests of the individual or another person.

Who is responsible for protecting a person's personal data?

CTC as a corporate body has ultimate responsibility for ensuring compliance with the Data Protection legislation.

CTC has delegated this responsibility day to day to the Town Clerk, who is contactable using the below details:

- Email: r.avery@crediton.gov.uk
- Phone: 01363 773717
- Post: Manor Office, 6 North Street, Crediton, EX17 2BR

Diversity Monitoring

CTC monitors the diversity of its employees and councillors, to ensure that there is no inappropriate or unlawful discrimination in the way it conducts its activities. It undertakes similar data handling in respect of prospective employees. This data will always be treated as confidential. It will only be accessed by authorised individuals within CTC and will not be disclosed to any other bodies or individuals.

Diversity information will never be used as selection criteria and will not be made available to others involved in the recruitment process. Anonymised data derived from diversity monitoring will be used for monitoring purposes and may be published and passed to other bodies. CTC will always give guidance on personnel data to employees, councillors, partners and volunteers through a Privacy Notice and ensure that individuals on whom personal information is kept are aware of their rights and have easy access to that information on request.

Appropriate measures will be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data.

Personal data shall not be transferred to a country or territory outside the European Economic Areas unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.

Information provided to us

Information provided (personal information such as name, address, email address, phone number) will be processed and stored so that it is possible for CTC to contact, respond to or conduct the transaction requested by the individual. By transacting with CTC, individuals are deemed to be giving consent for their personal data to be used and transferred in accordance with this policy, however wherever possible specific written consent will be sought. It is the responsibility of those individuals to ensure that CTC is able to keep their personal data accurate and up-to-date. The personal information will be not shared or provided to any other third party or be used for any purpose other than that for which it was provided.

CTC's Right to Process Information

General Data Protection Regulations (and Data Protection Act) Article 6 (1) (a) (b) and (e) Processing is with the consent of the data subject, or:

- Processing is necessary for compliance with a legal obligation
- Processing is necessary for the legitimate interests of CTC.

Information Security

CTC cares to ensure the security of personal data and will make sure that your information is protected from unauthorised access, loss, manipulation, falsification, destruction or unauthorised disclosure. This is done through appropriate technical measures and appropriate policies.

CTC will only keep your data for the purpose it was collected for and only for as long as is necessary, after which it will be deleted.

Children

CTC will not process any data relating to a child under 13 without the express parental/ guardian consent of the child concerned.

Rights of a Data Subject

Access to Information

An individual has the right to request access to the information held on them. This can be done by contacting the Town Clerk:

- Email: r.avery@crediton.gov.uk
- Phone: 10363 773717
- Post: Manor Office, 6 North Street, Crediton, EX17 2BR

Information Correction

If an individual believes that the information held about them is incorrect, they may contact the Town Clerk to ensure that it can be updated and keep their data accurate.

Information Deletion

If an individual wishes CTC to delete the information about them, they may contact the Town Clerk.

Right to Object

If an individual believes their data is not being processed for the purpose it has been collected for, they may object by contacting CTC.

CTC does not use automated decision-making or profiling of individual personal data.

Complaints

If an individual has a complaint regarding the way their personal data has been processed, they may make a complaint to the Town Clerk or directly to the Information Commissioner's Office:

- Email: casework@ico.org.uk
- Phone: 0303 123 1113

CTC will always give guidance on personnel data to employees through the Employee Handbook.

CTC will ensure that individuals on whom personal information is kept are aware of their rights and have easy access to that information on request.

Making Information Available

The adopted Publication Scheme is a means by which CTC can make a significant amount of information available routinely, without waiting for someone to specifically request it. The scheme is intended to encourage local people to take an interest in the work of CTC and its role within the community.

In accordance with the provisions of the Freedom of Information Act 2000, the Publication Scheme specifies the classes of information which CTC publishes or intends to publish.

All formal meetings of CTC and its committees are subject to statutory notice being given. CTC publishes an annual calendar of meetings in May each year. All formal meetings are open to the public and press and reports to those meetings and relevant background papers are available for the public to see.

CTC welcomes public participation and has a Public Participation Policy. Further details on speaking at meetings are detailed in CTC's Standing Orders, which are available on its website or can be made available by requesting a paper copy.

Occasionally, CTC may need to consider matters in private. Examples of this are matters involving personal details of staff, or a particular member of the public, or where details of commercial/contractual sensitivity are to be discussed. This will only happen after a formal resolution has been passed to exclude the press and public and reasons for the decision are stated. Minutes from all formal meetings, including the confidential parts are public documents. The Openness of Local Government Bodies Regulations 2014 requires written records to be made of certain decisions taken by officers under delegated powers and are detailed in CTC's Scheme of Delegation.

The 2014 Regulations also amend the Public Bodies (Admission to Meetings) Act 1960 to allow the public or press to film, photograph or make an audio recording of council and committee meetings normally open to the public. CTC will, where possible, facilitate such recording unless it is being disruptive. It will also take steps to ensure that children, and vulnerable/members of the public who object to being filmed are protected, without undermining the broader purpose of the meeting.

CTC will be pleased to make special arrangements on request (provided advance notice is given) for persons who do not have English as their first language or those with hearing or sight difficulties, where at all possible.

Disclosure Information

CTC will, as necessary, undertake checks on both staff and members with the Disclosure and Barring Service and will comply with their Code of Conduct relating to the secure storage, handling, use, retention and disposal of Disclosures and Disclosure Information. Further details are available in the DBS Policy.

Data Transparency

CTC acts, as appropriate and required, in accordance with the Code of Recommended Practice for Local Authorities on Data Transparency (September 2011).



General Privacy Notice

Introduction

This Policy outlines to the public how their personal data will be handled, stored and used by Credition Town Council (CTC).

Your personal data – what is it?

'Personal data' is any information about a living individual which allows them to be identified from that data (for example a name, photographs, videos, email address or address). Identification can be by the personal data alone or in conjunction with any other personal data. The processing of personal data is governed by legislation relating to personal data, which applies in the United Kingdom including the General Data Protection Regulation (the 'GDPR') and other local legislation relating to personal data and rights such as the Human Rights Act.

Council information

This Privacy Policy is provided to you by CTC which is the data controller for your data.

The Town Council office address is:

Manor Office
6 North Street
Credition
EX17 2BR

CTC also operates a website, where user's personal data is also collected, the address of the website is www.crediton.gov.uk

Who are the data controllers?

- Mid Devon District Council
- Devon County Council
- Other public authorities, central government and agencies such as HRMC and DVLA
- Boniface Allotment Association – This is a joint data controller arrangement for the administration of the Town Council's allotments
- Community groups
- Charities
- Other not for profit entities
- Contractors

We may need to share your personal data we hold with other data controllers so that they can carry out their responsibilities to CTC. If we and the other data controllers listed above are processing your data jointly for the same purposes, then CTC and the other data controllers may be 'joint data controllers', which means we are all collectively responsible to you for your data. Where each of the parties listed above are processing your data for their own independent purposes then each of us will be independently responsible to you and if you have any questions, wish to exercise any of your rights (see below) or wish to raise a complaint, you should do so directly to the relevant data controller.

A description of what personal data the council processes and for what purposes is set out in this Privacy Policy.

Data Protection Law

CTC will comply with data protection law. This says that the personal data we hold about you and any information that we hold as a council must be:

- Used lawfully, fairly and in a transparent way
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes
- Relevant to the purposes we have told you about and limited only to those purposes
- Accurate and kept up to date
- Kept only as long as necessary for the purposes we have told you about
- Kept and destroyed securely including ensuring that appropriate technical and security measures are in place to protect your personal data from loss, misuse, unauthorised access and disclosure.

What data is collected?

CTC will process some or all of the following personal data where necessary to perform its tasks:

- Names, titles, and aliases, photographs
- Contact details such as telephone numbers, addresses, and email addresses
- Where they are relevant to the services provided by CTC, or where you provide them to us, we may process information such as gender, age, marital status, nationality, education/work history, academic/professional qualifications, hobbies, family composition, and dependants
- Where you pay for activities such as use of a meeting space, financial identifiers such as bank account numbers, payment card numbers, payment/transaction identifiers, policy numbers, and claim numbers
- The personal data we process may include sensitive data such as criminal convictions and other special categories of personal data such as racial or ethnic origin, mental and physical health, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data, data concerning a person's sex life and sexual orientation.

Use of personal data

CTC may process sensitive personal data including, as appropriate:

- your racial or ethnic origin or religious or similar information in order to monitor compliance with equal opportunities legislation
- in order to comply with legal requirements and obligations to third parties.

These types of data are described in the GDPR as 'special categories of data' and require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal data.

We may process special categories of personal data in the following circumstances:

- In limited circumstances, with your explicit written consent
- Where we need to carry out our legal obligations
- Where it is needed in the public interest

Less commonly, we may process this type of personal data where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

Consent to process sensitive personal data

In limited circumstances, we may approach you for your written consent to allow us to process certain sensitive personal data. If we do so, we will provide you with full details of the personal data that we would like and the reason we need it, so that you can carefully consider whether you wish to consent.

Compliance with Data Protection Law

This says that the personal data we hold about you must be:

- Used lawfully, fairly and in a transparent way
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes
- Relevant to the purposes we have told you about and limited only to those purposes
- Accurate and kept up to date
- Kept only as long as necessary for the purposes we have told you about
- Kept and destroyed securely including ensuring that appropriate technical and security measures are in place to protect your personal data to protect personal data from loss, misuse, unauthorised access and disclosure.

We use your personal data for some or all of the following purposes:

- To deliver public services including to understand your needs to provide the services that you request and to understand what we can do for you and inform you of other relevant services, for example meeting room booking forms or Youth Service booking forms
- To confirm your identity to provide some services
- To contact you by post, email, telephone or using social media (e.g., Facebook, Instagram)
- To help us to build up a picture of how we are performing, for example responses to public consultations
- To prevent and detect fraud and corruption in the use of public funds and where necessary for the law enforcement functions
- To enable us to meet all legal and statutory obligations and powers including any delegated functions
- To carry out comprehensive safeguarding procedures (including due diligence and complaints handling) in accordance with adopted and best practice safeguarding practice from time to time with the aim of ensuring that all children and adults-at-risk are provided with safe environments and generally as necessary to protect individuals from harm or injury
- To promote the interests of the council
- To maintain our own accounts and records
- To seek your views, opinions or comments
- To notify you of changes to our facilities, services, events and staff, councillors and other role holders
- To send you communications which you have requested and consented to, and that may be of interest to you. These may include information about campaigns, appeals, other new projects or initiatives
- To process relevant financial transactions including grants and payments for goods and services supplied to the council
- To allow the statistical analysis of data so we can plan the provision of services.

Our processing may also include the use of CCTV systems for the prevention and prosecution of crime.

Legal basis for processing your data

CTC is a public authority and has certain powers and obligations.

Most of your personal data is processed for compliance with a legal obligation which includes the discharge of its statutory functions and powers. Sometimes when exercising these powers or duties it is necessary to process personal data of residents or people using the council's services.

We will always take into account your interests and rights.

This Privacy Notice sets out your rights and the council's obligations to you. We may process personal data if it is necessary for the performance of a contract with you, or to take steps to enter into a contract. An example of this would be processing your data in connection with the use of meeting spaces, or the acceptance of an allotment garden tenancy. Sometimes the use of your personal data requires your consent. We will first obtain your consent to that use.

Sharing personal data

This section provides information about the third parties with whom CTC may share your personal data. These third parties have an obligation to put in place appropriate security measures and will be responsible to you directly for the manner in which they process and protect your personal data. It is likely that we will need to share your data with some or all of the following (but only where necessary):

- The data controllers listed above under the heading 'Other data controllers the council works with'
- Our agents, suppliers and contractors. For example, we may ask a commercial provider to publish or distribute newsletters on our behalf, or to maintain our database software
- On occasion, other local authorities or not for profit bodies with which we are carrying out joint ventures e.g. in relation to events for the community.

How long do we keep personal data?

CTC will keep some records permanently if we are legally required to do so. We may keep some other records for an extended period of time. For example, it is currently best practice to keep financial records for a minimum period of 8 years to support HMRC audits or provide tax information.

We may have legal obligations to retain some data in connection with our statutory obligations as a public authority.

CTC is permitted to retain data in order to defend or pursue claims. In some cases, the law imposes a time limit for such claims (for example 3 years for personal injury claims or 6 years for contract claims). We will retain some personal data for this purpose as long as we believe it is necessary to be able to defend or pursue a claim.

In general, we will endeavour to keep data only for as long as we need it. This means that we will delete it when it is no longer needed.

A data audit is conducted annually.

Further information relating to document retention is available in CTC's Document Retention Policy.

Your rights and your personal data

You have the following rights with respect to your personal data (when exercising any of the rights listed below, in order to process your request, we may need to verify your identity for your security. In such cases we will need you to respond with proof of your identity before you can exercise these rights:

a) The right to access personal data we hold on you:

At any point you can contact us to request the personal data we hold on you as well as why we have that personal data, who has access to the personal data and where we obtained the personal data from. Once we have received your request we will respond within one month. There are no fees or charges for the first request but additional requests for the same personal data or requests which are manifestly unfounded or excessive may be subject to an administrative fee.

b) The right to correct and update the personal data we hold on you:

If the data we hold on you is out of date, incomplete or incorrect, you can inform us and your data will be updated.

c) The right to have your personal data erased:

If you feel that we should no longer be using your personal data or that we are unlawfully using your personal data, you can request that we erase the personal data we hold. When we receive your request, we will confirm whether the personal data has been deleted or the reason why it cannot be deleted (for example because we need it to comply with a legal obligation).

d) The right to object to processing of your personal data or to restrict it to certain purposes only:

You have the right to request that we stop processing your personal data or ask us to restrict processing. Upon receiving the request, we will contact you and let you know if we are able to comply or if we have a legal obligation to continue to process your data.

e) The right to data portability:

You have the right to request that we transfer some of your data to another controller. We will comply with your request, where it is feasible to do so, within one month of receiving your request.

f) The right to withdraw your consent to the processing at any time for any processing of data to which consent was obtained:

You can withdraw your consent easily by telephone, email, or by post (see Contact Details below).

g) The right to lodge a complaint with the Information Commissioner's Office:

You can contact the Information Commissioners Office on 0303 123 1113 or via email <https://ico.org.uk/global/contact-us> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF.

Transfer of Data Abroad

Any personal data transferred to countries or territories outside the European Economic Area ("EEA") will only be placed on systems complying with measures giving equivalent protection of personal rights either through international agreements or contracts approved by the European Union. Our website is accessible from overseas so on occasion some personal data (for example in a newsletter) may be accessed from overseas.

Further processing

If CTC wishes to use your personal data for a new purpose, not covered by this Privacy Policy, then we will provide you with a Privacy Notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions. Where and whenever necessary, we will seek your prior consent to the new processing.

Changes to this policy

We keep this Privacy Policy under regular review and we will place any updates on www.crediton.gov.uk.

This Policy was last updated in 2023.

Contact Details

Please contact us if you have any questions about this Privacy Policy or the personal data we hold about you or to exercise all relevant rights, queries or complaints using the below details:

Post: The Data Controller, Crediton Town Council, Manor Office, 6 North Street, Crediton,
EX17 2BR
Email: r.avery@crediton.gov.uk
Telephone: 01363 773717



Privacy Policy for Staff, Councillors and Role Holders

Introduction

This policy outlines to staff, councillors and role holders how they must handle, store and use personal data that they have access to in their work for Credition Town Council (CTC) or as councillors, and how CTC will handle, store and use personal data held about them.

Definitions

'Staff' means employees, workers, agency staff and those retained on a temporary or permanent basis.

'Councillors' means individuals who are elected or co-opted to the Council or any of its Committees, Working Groups or similar bodies.

'Role Holders' includes volunteers, contractors, agents, and other role holders within CTC, including former staff and former councillors. This also includes applicants or candidates for any of these roles.

CTC is committed to protecting the privacy and security of your personal information and the personal information that you come into contact with through your role at CTC.

This privacy policy describes how we collect and use personal information about you during and after your working relationship with us, and how you as a member of staff, councillor or role holder should use information in accordance with the General Data Protection Regulation (GDPR). It applies to all employees, councillors, workers and contractors. CTC is a 'data controller'. This means that we are responsible for deciding how we hold and use personal information. We are required under data protection legislation to notify you of the information contained in this privacy policy.

Your personal data – what is it?

'Personal data' is any information about a living individual which allows them to be identified from that data (for example a name, photographs, videos, email address or address). Identification can be by the personal data alone or in conjunction with any other personal data. The processing of personal data is governed by legislation relating to personal data, which applies in the United Kingdom including the General Data Protection Regulation (the 'GDPR') and other local legislation relating to personal data and rights such as the Human Rights Act.

Council information

This Privacy Policy is provided to you by CTC which is the data controller for your data.

The Town Council office address is:

Manor Office
6 North Street
Credition
EX17 2BR

CTC also operates a website, where user's personal data is also collected, the address of the website is www.crediton.gov.uk

Who are the data controllers?

- Mid Devon District Council
- Devon County Council
- Other public authorities, central government and agencies such as HRMC and DVLA
- Boniface Allotment Association – This is a joint data controller arrangement for the administration of the Town Council's allotments
- Staff pension providers
- Former and prospective employers
- Community groups
- Charities
- Other not for profit entities
- Contractors

We may need to share your personal data we hold with other data controllers so that they can carry out their responsibilities to CTC. If we and the other data controllers listed above are processing your data jointly for the same purposes, then CTC and the other data controllers may be 'joint data controllers', which means we are all collectively responsible to you for your data. Where each of the parties listed above are processing your data for their own independent purposes then each of us will be independently responsible to you and if you have any questions, wish to exercise any of your rights (see below) or wish to raise a complaint, you should do so directly to the relevant data controller.

A description of what personal data the council processes and for what purposes is set out in this Privacy Policy.

Data Protection Law

CTC will comply with data protection law. This says that the personal data we hold about you and any information that we hold as a council must be:

- Used lawfully, fairly and in a transparent way
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes
- Relevant to the purposes we have told you about and limited only to those purposes
- Accurate and kept up to date
- Kept only as long as necessary for the purposes we have told you about
- Kept and destroyed securely including ensuring that appropriate technical and security measures are in place to protect your personal data from loss, misuse, unauthorised access and disclosure.

What data is collected?

CTC will process some or all of the following personal data where necessary to perform its tasks:

- Names, titles, and aliases, photographs
- Start date / leaving date
- Contact details such as telephone numbers, addresses, and email addresses
- Where they are relevant to the services provided by CTC, or where you provide them to us, we may process information such as gender, age, marital status, nationality, education/work history, academic/professional qualifications, hobbies, family composition, and dependants
- The personal data we process may include sensitive data such as criminal convictions or other special categories of personal data such as racial or ethnic origin, mental and physical health, details of injuries, medication/treatment received, political opinions, trade union

membership, genetic data, biometric data, religious or philosophical beliefs, data concerning a person's sex life and sexual orientation

- Non-financial identifiers such as passport numbers, driving licence numbers, taxpayer identification numbers, staff identification numbers, tax reference codes, and national insurance numbers
- Financial identifiers such as bank account numbers
- Financial information such as National Insurance number, pay and pay records, tax code, tax and benefits contributions, expenses claimed
- Other operational personal data created, obtained, or otherwise processed while carrying out our activities, including but not limited to, CCTV footage, IP addresses and website visit histories, and logs of accidents, injuries and insurance claims
- Next of kin and emergency contact information
- Recruitment information (including copies of right to work documentation, references and other information included in a CV or cover letter or as part of the application process)
- Location of employment or workplace
- Other staff data (not covered above) including; level, performance management information; certificates; immigration status; employment status; information for disciplinary and grievance proceedings; and personal biographies
- CCTV footage and other information obtained through electronic means
- Where people pay for activities such as use of a council hall, financial identifiers such as bank account numbers, payment card numbers, payment/transaction identifiers, policy numbers, and claim numbers.

Use of personal data

CTC may use your personal data for some or all of the following purposes:

- Making a decision about your recruitment or appointment
- Determining the terms on which you work for us
- Checking you are legally entitled to work in the UK
- Paying you and, if you are an employee, deducting tax and National Insurance contributions
- Providing any contractual benefits to you
- Liaising with your pension provider
- Administering the contract we have entered into with you
- Management and planning, including accounting and auditing
- Conducting performance reviews, managing performance and determining performance requirements
- Making decisions about salary reviews and compensation
- Assessing qualifications for a particular job or task, including decisions about promotions
- Conducting grievance or disciplinary proceedings
- Making decisions about your continued employment or engagement
- Making arrangements for the termination of our working relationship
- Education, training and development requirements
- Dealing with legal disputes involving you, including accidents at work
- Ascertaining your fitness to work
- Managing sickness absence
- Complying with health and safety obligations
- To prevent fraud
- To monitor your use of our information and communication systems to ensure compliance with our IT policies
- To ensure network and information security, including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution

- To conduct data analytics studies to review and better understand employee retention and attrition rates
- Equal opportunities monitoring
- To undertake activity consistent with our statutory functions and powers including any delegated functions
- To maintain our own accounts and records
- To seek your views or comments
- To process a job application
- To administer councillors' interests
- To provide a reference.

Please note: We need all the categories of personal data in the list above primarily to allow us to perform our contract with you and to enable us to comply with legal obligations.

Our processing may also include the use of CCTV systems for monitoring purposes.

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

We will only use your personal data when the law allows us to.

Most commonly, we will use your personal data in the following circumstances:

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

We may also use your personal data in the following situations, which are likely to be:

- Where we need to protect your interests (or someone else's interests)
- Where it is needed in the public interest (or for official purposes).

How we use sensitive data

CTC may process sensitive personal data including, as appropriate:

- information about your physical or mental health or condition in order to monitor sick leave and take decisions on your fitness for work
- your racial or ethnic origin or religious or similar information in order to monitor compliance with equal opportunities legislation
- in order to comply with legal requirements and obligations to third parties.

These types of data are described in the GDPR as 'Special categories of data' and require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal data.

We may process special categories of personal data in the following circumstances:

- In limited circumstances, with your explicit written consent
- Where we need to carry out our legal obligations
- Where it is needed in the public interest.

Less commonly, we may process this type of personal data where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

Consent to process sensitive personal data

We do not need your consent if we use your sensitive personal data in accordance with our rights and obligations in the field of employment and social security law.

In limited circumstances, we may approach you for your written consent to allow us to process certain sensitive personal data. If we do so, we will provide you with full details of the personal data that we would like and the reason we need it, so that you can carefully consider whether you wish to consent.

You should be aware that it is not a condition of your contract with us that you agree to any request for consent from us.

Criminal Convictions

We may only use personal data relating to criminal convictions where the law allows us to do so. This will usually be where such processing is necessary to carry out our obligations and provided we do so in line with our data protection policy.

Less commonly, we may use personal data relating to criminal convictions where it is necessary in relation to legal claims, where it is necessary to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

Legal basis for processing your data

CTC is a public authority and has certain powers and obligations. Most of your personal data is processed for compliance with a legal obligation which includes the discharge of the council's statutory functions and powers. Sometimes when exercising these powers or duties it is necessary to process personal data of residents or people using the council's services. We will always take into account your interests and rights.

This Privacy Policy sets out your rights and the council's obligations to you.

We may process personal data if it is necessary for the performance of a contract with you, or to take steps to enter into a contract. An example of this would be processing your data in connection with the use of meeting space, or the acceptance of an allotment tenancy. Sometimes the use of your personal data requires your consent. We will first obtain your consent to that use.

Sharing personal data

This section provides information about the third parties with whom CTC may share your and others personal data. These third parties have an obligation to put in place appropriate security measures and will be responsible to you directly for the manner in which they process and protect your personal data. It is likely that we will need to share your data with some or all of the following (but only where necessary):

- The data controllers listed above under the heading 'Other data controllers the council works with'
- Our agents, suppliers and contractors. For example, we may ask a commercial provider to manage our HR/payroll functions, or to maintain our database software
- Other persons or organisations operating within local community
- Other data controllers, such as local authorities, public authorities, central government and agencies such as HMRC and DVLA
- Staff pension providers
- Former and prospective employers
- Professional advisors

- Trade unions or employee representatives
- Our agents, suppliers and contractors. For example, we may ask a commercial provider to publish or distribute newsletters on our behalf, or to maintain our database software
- On occasion, other local authorities or not for profit bodies with which we are carrying out joint ventures e.g. in relation to events for the community.

Council use of personal data to conduct business

In order to conduct Council business, CTC will use personal data for some or all of the following purposes:

- To deliver public services including to understand individual needs to provide the services requested and to understand what we can do for the individual and inform them of other relevant services
- To confirm identity to provide some services
- To contact individuals by post, email, telephone or using social media (e.g., Facebook, Instagram)
- To help us to build up a picture of how we are performing
- To prevent and detect fraud and corruption in the use of public funds and where necessary for the law enforcement functions
- To enable us to meet all legal and statutory obligations and powers including any delegated functions
- To promote the interests of the council
- To maintain our own accounts and records
- To seek views, opinions or comments
- To notify individuals of changes to our facilities, services, events and staff, councillors and other role holders
- To send communications which individuals have requested and consented, and that may be of interest. These may include information about campaigns, appeals, other new projects or initiatives
- To process relevant financial transactions including grants and payments for goods and services supplied to the council
- To allow the statistical analysis of data so we can plan the provision of services

Our processing may also include the use of CCTV systems for the prevention and prosecution of crime.

How long do we keep personal data?

CTC will keep some records permanently if we are legally required to do so. We may keep some other records for an extended period of time. For example, it is currently best practice to keep financial records for a minimum period of 8 years to support HMRC audits or provide tax information.

We may have legal obligations to retain some data in connection with our statutory obligations as a public authority.

CTC is permitted to retain data in order to defend or pursue claims. In some cases, the law imposes a time limit for such claims (for example 3 years for personal injury claims or 6 years for contract claims). We will retain some personal data for this purpose as long as we believe it is necessary to be able to defend or pursue a claim.

In general, we will endeavour to keep data only for as long as we need it. This means that we will delete it when it is no longer needed.

A data audit is conducted annually.

Further information relating to document retention is available in CTC's Document Retention Policy.

Your responsibilities

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

Your rights and your personal data

You have the following rights with respect to your personal data (when exercising any of the rights listed below, in order to process your request, we may need to verify your identity for your security. In such cases we will need you to respond with proof of your identity before you can exercise these rights:

- a) **The right to access personal data we hold on you:**
At any point you can contact us to request the personal data we hold on you as well as why we have that personal data, who has access to the personal data and where we obtained the personal data from. Once we have received your request we will respond within one month. There are no fees or charges for the first request but additional requests for the same personal data or requests which are manifestly unfounded or excessive may be subject to an administrative fee.
- b) **The right to correct and update the personal data we hold on you:**
If the data we hold on you is out of date, incomplete or incorrect, you can inform us and your data will be updated.
- c) **The right to have your personal data erased:**
If you feel that we should no longer be using your personal data or that we are unlawfully using your personal data, you can request that we erase the personal data we hold. When we receive your request, we will confirm whether the personal data has been deleted or the reason why it cannot be deleted (for example because we need it to comply with a legal obligation).
- d) **The right to object to processing of your personal data or to restrict it to certain purposes only:**
You have the right to request that we stop processing your personal data or ask us to restrict processing. Upon receiving the request, we will contact you and let you know if we are able to comply or if we have a legal obligation to continue to process your data.
- e) **The right to data portability:**
You have the right to request that we transfer some of your data to another controller. We will comply with your request, where it is feasible to do so, within one month of receiving your request.
- f) **The right to withdraw your consent to the processing at any time for any processing of data to which consent was obtained:**
You can withdraw your consent easily by telephone, email, or by post (see Contact Details below).
- g) **The right to lodge a complaint with the Information Commissioner's Office:**
You can contact the Information Commissioners Office on 0303 123 1113 or via email <https://ico.org.uk/global/contact-us> or at the Information Commissioner's Office, Wycliff House, Water Lane, Wilmslow, Cheshire SK9 5AF.

Transfer of Data Abroad

Any personal data transferred to countries or territories outside the European Economic Area (“EEA”) will only be placed on systems complying with measures giving equivalent protection of personal rights either through international agreements or contracts approved by the European Union. Our website is accessible from overseas so on occasion some personal data (for example in a newsletter) may be accessed from overseas.

Further processing

If CTC wishes to use your personal data for a new purpose, not covered by this Privacy Policy, then we will provide you with a Privacy Notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions. Where and whenever necessary, we will seek your prior consent to the new processing.

Changes to this policy

We keep this Privacy Policy under regular review and we will place any updates on www.crediton.gov.uk.

This Policy was last updated in 2023.

Contact Details

Please contact us if you have any questions about this Privacy Policy or the personal data we hold about you or to exercise all relevant rights, queries or complaints using the below details:

Post: The Data Controller, Crediton Town Council, Manor Office, 6 North Street, Crediton, EX17 2BR
Email: r.avery@crediton.gov.uk
Telephone: 01363 773717



Artificial Intelligence (AI) Usage Policy

Purpose

Artificial Intelligence (AI) tools now play an increasing role in helping local authorities work more efficiently, support decision-making, and improve the quality of written information.

When used properly, AI is a helpful assistant as it supports the work of officers and members, but it does not replace human judgement.

This policy sets out how Credition Town Council (CTC) will use AI safely, lawfully, and responsibly, ensuring that:

- Sensitive or confidential data is protected
- AI outputs are used with care and verification
- Only secure, approved systems are used
- Officers and members understand both the benefits and the risks.

This policy applies to all officers, contractors, volunteers, and members when carrying out any CTC business, whether on CTC-owned devices or personal devices.

Approved AI Systems

CTC currently approves the following AI systems for internal use:

Microsoft 365 Copilot

Where a CTC-owned licence is provided, Copilot may be used because:

- All data remains within the Council's Microsoft 365 tenant
- It uses the same secure permissions as Outlook, Teams, and SharePoint
- No data is used to train public AI models
- Microsoft meets UK GDPR and public sector security standards (ISO 27001; National Cyber Security Centre (NCSC) guidance)

Decisions

Where a CTC-owned licence is provided, in-built AI tools in the Decisions App may be used because:

- Decisions is hosted on CTC's Microsoft 365 tenant, and Microsoft Azure services are operated by Decisions
- Decisions' Azure services are hosted in several regions (UK, EU) depending on the type of service. All data storage is hosted in Azure EU data centres but may expand into additional GDPR-compliant regions according to the GDPR adequacy
- Decisions follow the GDPR and is ISO 27001:2013 certified. Microsoft 365 and Microsoft Azure have several certifications of their own as well that Decisions has obtained
- None of the AI interactions are used to train any public models.

CTC uses AI-supported transcription or summarisation tools through paid Microsoft Teams and Cloudy IT app accounts (Decisions).

To maintain confidentiality:

- No confidential Full Council or committee sessions are recorded or summarised using AI
- Any informal meetings dealing with sensitive matters must use Teams, which meets the same security standard as Copilot.

Permitted Uses of AI

AI is a practical tool to save time and improve clarity. Officers and members may use approved AI tools only to:

- Draft reports, letters, agendas, or meeting summaries
- Reformat or improve the tone and readability of written work
- Summarise long reports or transcripts
- Generate ideas, options, or structures for consultations or public engagement
- Clarify technical information in plain English.

AI should be treated as a thinking partner, not an author or decision-maker.

All outputs must be checked and edited before use by the officer or member.

Prohibited Uses of AI

To protect data, reputation, and legal compliance, the following uses are strictly prohibited.

Shadow AI – Absolutely Forbidden

‘Shadow AI’ means any AI tool outside CTC’s approved systems, including (but not exhaustive):

- Public ChatGPT
- Google Gemini
- Bard
- Claude
- AI features on personal Microsoft, Google, Apple accounts
- Free online writing, note-taking, translation, or image-generation tools
- Smartphone apps with embedded AI features
- Any AI product not licensed or approved by the Council or its IT providers.

No officer or member may use shadow AI for any CTC-related task whatsoever. This includes copying or pasting text, uploading documents, or using personal accounts to draft or summarise material.

Handling of Sensitive or Confidential Information

You must not enter into AI systems:

- Personal data (names, addresses, HR information, staff matters, salaries, phone numbers, email addresses)
- Legally sensitive or confidential documents (staffing, legal disputes, tenders, disciplinary matters)
- Any unredacted data relating to individuals or commercially confidential material.

If in doubt, do not use AI.

Prohibition on AI-Generated Images

To protect artistic integrity, avoid copyright risks, and support local creative professionals, CTC will not use AI to generate:

- Photographs
- Branding
- Logos
- Graphics or illustrations.

Safeguards and Required Practices

To ensure safe and responsible AI use:

- Use only approved tools

- Copilot, Teams and Decisions (with a valid CTC-owned licence)
- Redact or anonymise sensitive information
If a document contains personal or confidential information, remove identifiers before using AI or do not use AI at all
- Maintain human oversight
AI is advisory. Officers and members remain fully responsible for decisions, reports, and published material
- Verify all outputs
Check for accuracy, tone, relevance, and potential bias. AI may make errors or produce outdated or misleading information
- Store documents correctly
Misplaced SharePoint or Teams files can be surfaced by Copilot. Always save documents in the correct CTC folders and report any inappropriate access immediately.
- Transparency
Where relevant, note that AI supported the drafting process (internal comment or note).
- Report concerns
Raise any uncertainty with the Town Clerk before proceeding.

Why This Approach Is Responsible

This policy ensures:

- Compliance with UK GDPR
- Security, as all information stays within approved, encrypted systems
- Transparency and accountability for all AI-generated content
- Proportionate use, supporting efficiency without handling sensitive data
- Support for local creative industry, by avoiding AI image generation
- Confident, safe working practices, reducing risk to CTC and the public.

AI assists our work, it does not drive it. Human judgement remains at the centre of CTC operations.

Training and Building Confidence

CTC recognises that AI is a developing area. Confidence grows through practice and understanding.

To support this:

- Further training for staff and members will be sought on request
- Officers and members will be able to ask questions and see practical examples
- Training will emphasise safe use, accuracy, and professional responsibility
- The aim is to empower users; 'You control it, it doesn't control you'.

Future Changes and Review of this Policy

CTC is actively considering:

- Strengthening tenant security with Business Premium for members.

Confidential information will remain protected under tenant permissions.

It is recognised that this AI Policy is an interim policy, and requires further review as further information is obtained.

Until then, this interim policy remains in force in full.

This AI policy will be reviewed every 3–6 months, or sooner if required by legislative or technical change, to reflect the speed of change in this developing technology.



Responding to Subject Access Requests Procedure

Introduction

This procedure is to be followed when an individual contacts Crediton Town Council (CTC) to request access to their personal information held by CTC.

Requests must be completed within 1 month, so it should be actioned as soon as it is received.

SAR's should be provided free of charge, however, you can charge a 'reasonable fee' when a request is manifestly unfounded or excessive, particularly if it is repetitive.

Actioning the request

The steps below should be followed to action the request:

1. Is it a valid subject access request?

- a) The request must be in writing (letter or email).
- b) Has the person requesting the information provided you with sufficient information to allow you to search for the information? (You are allowed to request for more information from the person if the request is too broad).

2. Verify the identity of the requestor

- a) You must be confident that the person requesting the information is indeed the person the information relates to. You should ask for the person to attend the office with their passport/photo driving licence and confirmation of their address (utility bill/bank statement).

3. Determine where the personal information will be found

- a) Consider the type of information requested and use the data audit to determine where the records are stored (Personal data is data which relates to a living individual who can be identified from the data (name, address, email address, database information) and can include expressions of opinion about the individual).
- b) If you do not hold any personal data, inform the requestor.
- c) If you do hold personal data, continue to the next step.

4. Screen the information

- a) Some of the information you have retrieved may not be disclosable due to exemptions, however legal advice should be sought before applying exemptions. Examples of exemptions are:
 - References you have given
 - Publicly available information
 - Crime and taxation
 - Management information (restructuring/redundancies)
 - Negotiations with the requestor
 - Regulatory activities (planning enforcement, noise nuisance)



- Legal advice and proceedings
- Personal data of third parties.

5. Are you able to disclose all the information?

- a) In some cases, emails and documents may contain the personal information of other individuals who have not given their consent to share their personal information with others. If this is the case, the other individual's personal data must be redacted before the SAR is sent out.

6. Prepare the SAR response (using the sample letters at Appendix A)

Ensure to include as a minimum the following information:

- a) the purposes of the processing
- b) the categories of personal data concerned
- c) the recipients or categories of recipients to whom personal data has been or will be disclosed, in particular in other countries or to international organisations, including any appropriate safeguards for transfer of data
- d) where possible, the envisaged period for which personal data will be stored, or, if not possible, the criteria used to determine that period
- e) the existence of the right to request rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing
- f) the right to lodge a complaint with the Information Commissioners Office (ICO)
- g) if the data has not been collected from the data subject, the source of such data
- h) the existence of any automated decision-making, including profiling and any meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.

Be sure to also provide a copy of the personal data undergoing processing. All SAR's should be logged to include the date of receipt, identity of the data subject, summary of the request, indication of if CTC can comply, date information is sent to the data subject.



Appendix A

Sample letters

Replying to a subject access request providing the requested personal data

Dear [Name of data subject]

Data Protection subject access request "[Name] [Address] [Date]

Thank you for your letter of [date] making a data subject access request for [subject]. We are pleased to enclose the personal data you requested.

Include 6(a) to (h) above.

Copyright in the personal data you have been given belongs to CTC or to another party. Copyright material must not be copied, distributed, modified, reproduced, transmitted, published or otherwise made available in whole or in part without the prior written consent of the copyright holder.

Yours sincerely

Release of part of the personal data, when the remainder is covered by an exemption

Dear [Name of data subject]

Data Protection subject access request "[Name] [Address] [Date]

Thank you for your letter of [date] making a data subject access request for [subject]. To answer your request we asked the following areas to search their records for personal data relating to you:

- [List the areas]

I am pleased to enclose [some/most] of the personal data you requested.

[If any personal data has been removed] We have removed any obvious duplicate personal data that we noticed as we processed your request, as well as any personal data that is not about you.

You will notice that [if there are gaps in the document] parts of the document(s) have been blacked out.

[OR if there are fewer documents enclose] I have not enclosed all of the personal data you requested. This is because [explain why it is exempt].

Include 6(a) to (h) above.

Copyright in the personal data you have been given belongs to the council or to another party. Copyright material must not be copied, distributed, modified, reproduced, transmitted, published, or otherwise



made available in whole or in part without the prior written consent of the copyright holder.

Yours sincerely

Replying to a subject access request explaining why you cannot provide any of the requested personal data

Dear [Name of data subject]

Data Protection subject access request "[Name] [Address] [Date]

Thank you for your letter of [date] making a data subject access request for [subject]. I regret that we cannot provide the personal data you requested. This is because [explanation where appropriate]. [Examples include where one of the exemptions under the data protection legislation applies. For example the personal data might include personal data is 'legally privileged' because it is contained within legal advice provided to the council or relevant to on-going or preparation for litigation. Other exemptions include where the personal data identifies another living individual or relates to negotiations with the data subject. Your data protection officer will be able to advise if a relevant exemption applies and if the council is going to rely on the exemption to withhold or redact the data disclosed to the individual, then in this section of the letter the council should set out the reason why some of the data has been excluded.]

Yours sincerely



Data Breach Policy

Introduction

Credition Town Council (CTC) issues this policy to meet the requirements of the General Data Protection Regulations (GDPR) 2018 for the handling of personal data in its role as a Data Controller.

This policy applies to councillors and all employees of CTC including contract, agency and temporary staff, volunteers and employees of partner organisations working for CTC.

CTC must have in place a robust and systematic process for responding to any reported issues, to ensure it can act responsibly and protect personal data which it holds. In any situation where staff are uncertain whether an incident constitutes a breach of security, it must be reported to a line manager. Appropriate measures will be implemented to protect personal data from incidents (either deliberate or accidental), to avoid issues that could compromise security.

Data Breaches

A Data Breach is defined as the compromising of the confidentiality, integrity, or availability of personal data which may result in harm to individual(s), reputational damage, detrimental effect on service provision, legislative non-compliance, and/or financial costs.

A Data Breach can come in many forms, but the most common are as follows:

- Inappropriate sharing or dissemination
- Hacking, malware, data corruption
- Unescorted visitors accessing data
- Non-secure disposal of data
- Loss or theft of confidential or sensitive data or equipment on which such data is stored (e.g. loss of laptop, iPad/tablet device, paper record)
- Unauthorised use of, access to or modification of data or information systems
- Attempts (failed or successful) to gain unauthorised access to information or IT system(s)
- Unauthorised disclosure of sensitive/confidential data (e.g. login details, emails to the wrong recipient, not using BCC, post to the wrong address)
- Website defacement
- Unforeseen circumstances such as a fire or flood
- Breaches of policy such as filing cabinets left unlocked

Near misses can include, but are not limited to, scenarios such as emails sent to the wrong recipient where a non-delivery report bounces back. The aim of this policy is to standardise the CTC's response to any Data Breach and ensure that they are appropriately logged and managed in accordance with the law and best practice, so that:

- Incidents are reported swiftly and can be properly investigated
- Incidents are dealt with in a timely manner and normal operations restored
- Incidents are recorded and documented
- The impact of the incident is understood, and action is taken to prevent further damage
- The Data Protection Officer (DPO) and the Information Commissioner's Office (ICO) and data subjects are informed as required in more serious cases.
- Incidents are reviewed and lessons learned.

This procedure sets out how CTC will manage a report of a suspected data breach. The aim is to ensure that where data is misdirected, lost, hacked or stolen, inappropriately accessed or damaged, the incident is properly investigated and reported and any necessary action is taken to rectify the situation.

If there are IT issues, such as the security of the network being compromised, the Town Clerk should be informed immediately.

The GDPR applies to both Data Controllers (CTC itself) and to Data Handlers. Therefore, all information users are responsible for reporting actual, suspected, threatened or potential information security incidents and for assisting with investigations as required, particularly if urgent action must be taken to prevent further damage.

The Town Clerk is responsible for ensuring that staff in their area act in compliance with this policy and assist with investigations as required. The Town Clerk, acting as the Data Protection Officer (DPO), will be responsible for overseeing management of the breach in accordance with the Policy. Suitable further delegation may be appropriate in some circumstances.

Security Impact Management (SIM)

CTC's DPO shall complete the following phases of SIM:

1. Preparation – CTC will understand its environment and be able to access the necessary resources in times of incidents. It will also ensure its staff are aware of how to identify and report breaches.
2. Identification – CTC will determine whether there has been a breach, or a near miss, it will also assess the scope of the breach, and the sensitivity on a risk basis.
3. Containment and Eradication – CTC will take immediate appropriate steps to minimise the effect of the breach. It will establish whether there is anything that can be done to recover any losses and limit the damage the breach could cause and will establish who may need to be notified as part of the initial containment and will inform the police and other enforcement bodies where appropriate.
4. Recovery – CTC will determine the suitable course of action to be taken to ensure a resolution to the incident. This may include re-establishing systems to normal operations, possibly via reinstall or restore from backup.
5. Learning from Experience (LfE) – an assessment will be made on the likely distress on any affected data subjects. This will then form the decision on whether to report this to the regulator (ICO) which must be reported within 72 hours, and to the affected data subjects which must be done without undue delay. Officers may also be notified to handle any queries and release statements.

Phases (2) to (5) will form part of the investigation process. This process should commence immediately and wherever possible within 24 hours of the breach being discovered or reported. If necessary, a report recommending any changes to systems, policies and procedures will be considered by the Town Clerk. This will include the decision on whether to report to the regulator and affected data subjects. A review of existing controls will be undertaken to determine their adequacy, and whether any corrective action should be taken to minimise the risk of similar incidents occurring. The review will consider:

- Whether policy controls are sufficient
- Whether training and awareness can be amended and/or improved
- Where and how personal data is held and where and how it is stored
- Where the biggest risks are apparent and any additional mitigations
- Whether methods of transmission are secure
- Whether any data sharing is necessary.

Monitoring and Compliance

Compliance with this policy shall be monitored through a review process. This will be agreed with the Data Protection Officer, and compliance will be reported to line management. Should it be found that this policy has not been complied with, or if an intentional breach of the policy has taken place, the organisation shall have full authority to take the immediate steps considered necessary, including disciplinary action.

This policy will be reviewed upon any change of Data Protection Officer or change of legislation and no less than every two years.

Data Incident Reporting Form

Name of person completing the form:

Contact details:

1. About the Incident	
Date and time of incident	
Location of incident	
Date and time of notification incident occurred (providing explanations if there was any delay in reporting the incident)	
Name of person who notified the Council that the incident took place.	
Description of incident	

2. Recovery of the Data	
Measures taken to contain the incident (including limiting the initial damage, notifying the Police of theft, providing support to affected data subjects etc)	
Details of attempts to recover data (including dates and times)	



Protocol for dealing with Freedom of Information (FOI) Requests

Introduction

Credition Town Council (CTC) has produced and publicised a Publication Scheme, which makes it clear what information can already be accessed. The Publication Scheme outlines any charges which may be made in supplying any information.

Any additional information which is not part of the Publication Scheme can be requested under the Freedom of Information Act 2000.

Responsibility for dealing with all requests for information has been delegated to the Town Clerk.

How to make an FOI Request

A request for information must be made by letter or e-mail and should be sent to the Town Clerk. The request must include a contact name, an address for correspondence and state clearly what information is required.

Steps for dealing with an FOI Request

- 1) CTC will identify whether the requested data is held by CTC. If not, the applicant will be notified accordingly.
- 2) If information is held, and is not subject to any exemption, it will normally be supplied within 20 working days unless there is a fee to pay, or further clarification must be sought.
- 3) If the request for information is unclear, the Town Clerk or an appropriate officer will contact the applicant to clarify what data is being sought. If clarification of a request is needed, the 20 working day period will commence on receipt of the additional information.
- 4) If the information is not held by CTC, but is aware of another public body which may hold the information, the applicant will be given details of which public authority is believed to hold the information.
- 5) Where information cannot be provided, a refusal notice will be issued explaining which exemption applies, and advising of any right to appeal, if applicable.
- 6) Where information is subject to a 'qualified exemption' under the FOI Act, there may be an extension to the 20 day period whilst further consideration is given to applying the public interest test, to determine whether any information should be withheld or disclosed.

Recording FOI Requests

All FOI requests will be held by CTC and will be made publically available, where it is appropriate to do so.

CTC will publish all requests and their outcomes on its website.

Complaints

Where any complaint is received about the processing of any request for information, this will be referred on to Full Council for attention.

Referral to the Information Commissioners Office

Where any correspondence is received from the Information Commissioner's Office in relation to any Freedom of Information matter, this will be referred to Full Council for attention.

Monitoring and Compliance

This policy will be reviewed upon any change of Data Protection Officer or change of legislation and no less than every two years.



Communications and Media Protocol

Introduction

This protocol acts as a reference tool for any employee or councillor of Credition Town Council (CTC) who engages with the media or communicates with members of the public. It also includes guidance on personal use of social media where it could be deemed to have a negative impact on CTC's reputation.

This protocol applies to all CTC employees and councillors.

CTC receives enquiries from the media, constituents and wider members of the public every year. The purpose of this protocol is to clarify the roles and responsibilities of the Town Clerk, Mayor, all employees and all councillors and provides guidance on how to handle media interest. The aim of the protocol is to ensure that CTC is seen to communicate in a professional and objective manner. In all cases, CTC's outside communications should be:

- Open and honest
- Proactive
- Responsive and timely.

Where this policy relates to an employee, appropriate adopted policies may be used such as the disciplinary procedure.

Where the policy relates to a member, concerns may be dealt with informally by the Town Clerk and/or the Mayor, or a complaint will be referred to the Monitoring Officer.

Definitions

CTC may use artificial intelligence (AI) tools such as Microsoft Co-Pilot to assist with drafting wording for press releases, newsletters, or social media posts. However, AI will not be used to generate imagery or to replace bespoke design work created by staff or professional designers. All AI-generated content will be reviewed and personalised by the member of staff and approved by the Town Clerk before publication to ensure it aligns with CTC's values and policies.

Legal Issues

There are circumstances under which employers can be held legally responsible for content published by their employees. This may include action taken as part of their role for the organisation and material published on official organisation channels or somewhere that has been previously sanctioned by CTC. It is therefore important to make all employees aware of the potential legal issues with regards to communication. It is important that employees are aware that communicating information about CTC cannot be isolated from their working life. For example, any information published online can be accessed around the world within seconds and will be publicly available for all to see.

Employees and councillors should take the following into consideration when using social media:

- Be aware of CTC guidelines for using social media, whether this is for personal use or as a part of their working role (See 'SOCIAL MEDIA')

- Be familiar with the legal areas outlined below before writing or speaking about colleagues or sharing information about CTC
- Ensure that verbal or written information does not disclose privileged or confidential information.

Libel and defamation

Defamation is the act of making a statement about a person or company that is considered to harm reputation, for example, by lowering others' estimation of the person or company, or by causing them to lose their rank or professional standing. If the defamatory statement is written down (in print or online) it is known as libel.

There are exceptions to this - posting a defamatory statement online or recording it on a podcast would both be examples of libel.

Other points to note

An organisation may be held responsible for something an employee or councillor has written or said if it is on behalf of the company or on a company-sanctioned space. Action can also be taken against anyone repeating libellous information from another source, so careful checks are needed before quoting statements from websites. This can also apply to linking to defamatory information. You should consider whether a statement can be proved before writing or using it; in law, the onus is on the person making the statement to establish its truth.

Publicity

The media plays a huge role in informing residents about what CTC does and how it spends their money (this applies to at all tiers of government).

It is therefore vital that CTC communicates effectively with the media and wherever possible will take a positive approach to meeting media requests for information and interviews.

This approach will help achieve the following objectives:

- Ensure that CTC is recognised as one which is open, accountable, accessible and which listens
- Share and celebrate CTC's successes
- Give information about policies and services and about the democratic process so that people feel more informed about the work of CTC
- Handle negative issues clearly and decisively.

Publicity in Election Periods

The rules governing publicity change when an election has been announced. In the period between the notice of an election and the election itself all proactive publicity about candidates or other politicians is halted. This applies to local and national elections. During this period, council publicity should not deal with controversial issues or report views, proposals or recommendations in a way that identifies them with individual councillors or groups of councillors. This is to make sure that no individual or political party gains an unfair advantage by appearing in corporate publicity. In these circumstances, where a quote is required, the relevant officer may be quoted, in accordance with the guidelines in this protocol.

Young People and Publicity

Guidelines should be followed if commissioning photographs of children (i.e. under 18 years of age) or if planning photography of children at events and using visual media for publicity purposes. Please refer to CTC's Safeguarding Policies for further information on this subject.

Tone and Style

All CTC communications should follow a consistent tone and style that reflects professionalism, accessibility, and openness. A friendly, respectful, and informative tone is encouraged, avoiding jargon and using plain language wherever possible.

Digital Accessibility

CTC is committed to ensuring that its digital communications are accessible to as wide an audience as possible. This includes using alt text for images, avoiding overly complex formatting, and ensuring compatibility with screen readers and assistive technologies where feasible.

The Media

The local press generally only covers stories relevant to people living and working in Crediton and the immediate surrounding areas. They include the Crediton Courier (paid for) and community magazines. Other local media include radio stations such as Radio Exe, BBC Radio Devon and Heart, all of which have specific target audiences. Regional media includes newspapers like the Western Morning News and online news sites like Devon Live. It is rare that CTC would be involved in media communications at a national, international or specialist level however the protocol remains pertinent in these cases.

Identifying Newsworthy Items and Handling Media Enquiries

It is the responsibility of everyone working within CTC to identify worthy news items and this should be done as early as possible. These might include Mayoral engagements, CTC events or promoting successes. Ideas for news items should be sent to the Town Clerk or the Events and Town Centre Officer. Staff will co-ordinate all media enquiries into the office. In certain circumstances it may be appropriate for the lead officer, councillor or the Mayor to respond to the enquiry, in line with this protocol. Officers who are directly approached by a member of the media should not attempt to answer questions themselves without gleaning the full facts and should confer with the Town Clerk before responding. However simple, factual queries will be dealt with appropriately by the office. Councillors who are directly approached by a member of the media may respond in accordance with the guidance contained in this protocol. No individual member of staff or councillor should pass comment on leaks, anonymous allegations or allegations about individual staff and councillors. CTC is open and accountable and should always explain if there is a reason why it cannot answer a specific enquiry.

News or Press Releases

News or press releases are one of the key techniques for publicising CTC's activities, decisions and achievements.

There are two types of press releases - Official Council Press Releases and Councillor Press Releases.

Official Council Press Releases

An official Council release is made on behalf of CTC as a whole; it will be written by an officer and authorised by the Town Clerk. It is non-party political and will normally include a quote from the relevant councillor(s). This is usually the Mayor or Committee Chair. Official Council press releases will follow a corporate style appropriate for the media being targeted and a central record will be maintained. All releases will accurately reflect the corporate view of CTC, contain relevant facts and include an approved quotation from the appropriate councillor. Matters of style, presentation, punctuation, grammar etc are the responsibility of the author. Releases will not promote the views of specific political groups, publicise the activities of individual councillors, identify a political party or persuade the general public to hold a particular view. All official council news/press releases will be placed on the council's website within one working day of issue. It should be borne in mind that a news or press release is not always the best way to publicise an activity or event and alternative ways of advertising it should be considered e.g. posters, mailings, websites, social networking etc.

Councillor Press Releases

Councillor press releases are personal and are written and issued by the councillor responsible. This release may or may not be political and should not include the title 'councillor', name of any officer, use the council crest or the council telephone number as a point of contact. It would be beneficial for

copies of intended releases, especially those of a factual nature, to be provided to the Town Clerk. Councillors seeking advice can contact the Town Clerk for advice.

Interviews

Any officer contacted by a journalist requesting an interview should refer the journalist to the Town Clerk, the Mayor or the appropriate Committee Chair. The person put forward for interview will depend on the situation and the information required by the journalist. Officers should never give their opinion on specific CTC policy but must keep to the corporate line and key messages. Their role is to provide expertise and factual knowledge only, in support of CTC's approved and agreed policies.

Media Activity Ahead of Meetings

The media pick up many stories from agendas and reports ahead of meetings. All Council and Committee agendas are automatically published on the CTC website. Members of the media are welcome to attend and regularly do attend meetings. During meetings, councillors should be mindful that any comments and messages are put across in a manner which gives the journalist an accurate picture, rather than relying on the journalist's interpretation of what can be a complex issue or report.

Media Crisis Response

In the event of a crisis or potentially damaging issue, a coordinated response will be led by the Town Clerk (or Deputy Clerk in their absence) in consultation with the Mayor and the relevant Committee Chair. Holding statements should be prepared promptly, and all media contact will be channelled through the Town Clerk unless otherwise agreed.

Non-Council Related Media Activity

Staff and councillors who have contact with the media in a personal capacity or as members of non-council related organisations must not refer to CTC posts and must make it clear to the journalist concerned that they are speaking in a personal capacity or on behalf of the non-council related organisation.

Managing Negative Issues

From time to time, CTC has to respond to negative issues. It is important that these situations are managed carefully to limit the potential for negative publicity. Staff and councillors must alert the Town Clerk as soon as a potentially negative issue which may attract media interest comes to light. They should not wait until contact is made by the media. Staff and councillors must be prepared to work together to prepare holding statements, other information and carry out research even if no media have contacted CTC about an issue.

Correcting Inaccurate Reporting

Should the media (a newspaper or broadcaster) publish/broadcast something inaccurate about CTC, a quick decision needs to be taken on any action necessary to correct it. The issue should be discussed with the Town Clerk to decide what action is appropriate. This could be a letter or news release, a conversation with the journalist concerned, a personal letter to the editor or legal advice. It is also necessary to decide who the most appropriate person is to take the necessary agreed action i.e. the Mayor, Committee Chairman or Officer. It should be noted that in the case of minor inaccuracies which have little or no impact on the message being conveyed, it can sometimes be counterproductive to complain. Each case must be judged individually. Occasionally, CTC will get something wrong. In these cases, damage limitation is the key; this can usually be achieved by holding hands up, apologising, and stating how we are going to learn from the error or put it right.

CTC Newsletter

CTC publishes a newsletter on a bi-monthly basis. Whilst available online, it is also available in hard copy which enables CTC to reach more local people who do not have access to the internet/social media. Content is created in house in consultation with any appropriate councillors. Ideas for articles are welcomed, and these should be passed directly to the Town Clerk or Deputy Clerk.

Social Media

‘Social media’ is the term commonly given to websites, online tools and other platforms which allow users to interact with each other in some way, by sharing information, opinions, knowledge and interests.

As the name implies, social media involves the building of communities or networks, encouraging participation and engagement.

This protocol will also apply to any new or emerging technologies or systems which may develop in the future. Current examples include (but are not limited to) podcasts, message boards, social networking sites, such as Facebook, X, Instagram and SnapChat, and content sharing websites such as YouTube.

The aims of this protocol are:

- To ensure that social media used to communicate with the public, partners or other stakeholders by all staff in the performance of their duties is aligned to the views of CTC
- To ensure that all CTC media sites are easily identifiable as originating from CTC and correctly apply the council’s logo and brand guidelines
- To protect the reputation of CTC while embracing the possibilities of this communications channel
- To ensure that any CTC communication through social media meets legal requirements and is consistent with other communication activities
- To prevent the unauthorised use of CTC branding on employees’ or councillors personal social media sites.

CTC recognises that social media is an effective means of communication and will operate a number of social media channels as part of its communications.

CTC aims to use social media to support two-way communication with the community but recognises that it is not always appropriate to respond to every message/comment, publicly or otherwise. For complex issues users should be referred to traditional forms of communication e.g. email or telephone.

Applying this protocol: Council-run channels

- CTC staff considering the use of, or wishing to use, social media as a channel for a project or campaign must first discuss and agree this with the Town Clerk and Mayor
- Social media channels already featuring CTC’s logo or branding must comply with brand guidelines
- The unauthorised use of the CTC logo or branding on social media channels may result in action under the disciplinary procedure
- Individual employees must not post any items on sites unless this has been reviewed by the Town Clerk before publication to avoid unintentional errors or misrepresentation. A clear audit trail should be maintained for significant posts.

Applying this protocol: personal use of social media channels

If you already make reference to your employment/involvement with CTC on a personal digital site as defined above, or you intend to create such a site, you should inform the Town Clerk who will advise you of the appropriateness of doing this in line with the advice below:

- Do not engage in activities on the internet that might bring CTC into disrepute

- Do not use the CTC logo on personal web pages
- Do not reveal information which is confidential to the Council - consult the Town Clerk if you are unsure
- Do not include contact details or photographs of service users or staff without their permission
- Under no circumstance should offensive comments be made about CTC, councillors, or colleagues on the Internet. This may amount to cyber-bullying or defamation and could be deemed a disciplinary offence. Social media campaigns Employees or Councillors who are considering social media campaigns should firstly consult the Town Clerk for guidance. Coordinating efforts and using the Town Council corporate account can ensure that the project has a clear purpose, fits into the existing Town Council views and is suitable for the target audience they wish to reach.

Replying to messages and comments on Social Media

Social media channels should be monitored effectively during office hours, acknowledging that all staff are responsible for this and that workloads will vary day-to-day.

Monitoring is essential to ensure that defamatory, abusive or derogatory comments or messages are removed as soon as practically possible. The following steps will be taken to ensure appropriate use of CTC social media platforms:

- Screenshots will be taken before removing such comments to provide an audit trail and evidence if required
- CTC reserves the right to restrict ('turn off') comments on individual posts where comments are irrelevant to the original post, are offensive or trolling in nature (or otherwise not conducive to a balanced discussion), or where they should be directed elsewhere (e.g. a consultation link or to another authority)

Where comments from the public are made on CTC social media posts, the policy is not to respond unless absolutely necessary. Where a reply is considered necessary a standard, single response should be: '[summarise answer to query / signpost to relevant info] and that will not be commenting on this further via social media, so any further questions should be directed to [email] or [relevant meeting].'

CTC reserves the right to post on its social media pages, with commenting disabled features. This will be considered on a case-by-case basis by officers.

CTC reserves the right to turn off commenting on any post, following agreement between the Town Clerk and Chair of the Council which will be documented to provide an audit trail.

Responding to CTC matters via social media should be done using council channels within office hours, unless the enquiry is an emergency or urgent matter.

Where direct messages are received via CTC's social media channels, an automatic reply will be sent advising that messages should be emailed to CTC's main email address, and that social media direct messages will not be monitored or responded to.

CTC reserves the right to block any profile who regularly breaches the policy, following agreement between the Town Clerk and Chair of the Council which will be documented to provide an audit trail.

Social Media Tips and Advice

Social Media or Social Networking is both a broadcast medium and a receiving medium. From the business point of view:

- It can be used as a receiving medium to gather opinions about CTC which have appeared on social media networks. As such it is an invaluable tool to add to our understanding of what people think about us
- It is possible to broadcast using the same social media networks to engage with and talk to those who are interested enough to have a view. As such it is a useful and powerful tool.

From a personal point of view:

- Individuals employed by CTC are entitled to use whatever system they like outside of their working time and working persona, to engage in the social aspects of the media – both broadcasting and receiving
- However great care should be taken to ensure the private/work line is not crossed
- It is good practice to follow the stricture of never mentioning work, your opinions of your colleagues or processes and projects on your own private Social Media networks. This aspect is covered in 'LEGAL ISSUES'.

Data Protection and Freedom of Information

Councillors are reminded that they must not misuse CTC resources for political or other inappropriate purposes. Should CTC receive a request for information under the Freedom of Information Act 2000 on a topic on which there is correspondence (email or written), normally that correspondence would have to be disclosed, unless it was exempt. The fact that the disclosure of the correspondence may prove embarrassing would not, in itself, prevent disclosure. In addition, care should be taken when processing personal data. The Data Protection Act 1998 prevents the use of personal information other than for the purposes for which it was supplied. Councillors should bear this in mind when using any personal data which may be supplied to them by their constituents.

Internet Acceptable Use Policy

Internet use covers all websites (including the CTC website), networking sites such as Facebook, X, Instagram etc, forums and blogs which may be used by both staff and councillors. If the above are used in an official capacity or for CTC related business, the guidance in this protocol must be adhered to and they must be used in a responsible and appropriate manner.

Under the consideration of Acceptable Use, when acting in the capacity of CTC, websites should not:

- contain content that may result in actions for libel, defamation or other claims for damages
- be used to process personal data other than for the purpose stated at the time of capture
- promote any political party or used for campaigning
- promote personal financial interests or commercial ventures
- be used for personal campaigns
- be used in an abusive, hateful or disrespectful manner
- If social media is used in an unofficial capacity, staff and councillors should restrain from making remarks that could be construed as bringing CTC into disrepute. Please see "SOCIAL MEDIA".

ADMINISTRATION OF INSTAGRAM AND FACEBOOK

CTC encourages open and two-way conversation with constituents, partner agencies, members of the many communities in which it participates and the general public. Such dialogue is crucial in our effort to engage with members of the public and to support our values of openness, fairness, flexibility and teamwork.

CTC expects all employees and councillors to exercise personal responsibility when participating in social media. This includes not breaching the trust of those with whom you are engaging.

General operating guidelines:

1. Do not publish any information which is not already in the public arena.
2. Be accurate, fair, thorough and transparent.
3. Ask a colleague or councillor to check wording for accuracy.
4. Be mindful that what you publish may be public for a long time.
5. Respect copyright laws.
6. Do not publish or report on conversations that are meant to be private or internal to CTC without permission.
7. Do not cite or reference customers, partners or suppliers without their approval.
8. When you do make a reference, link back to the source where possible.
9. Respect your audience. Do not publish anything that would not be acceptable in the workplace. You should also show proper consideration for others' privacy and for topics that may be considered objectionable or inflammatory, such as politics and religion.
10. Remember that you are an ambassador for the council and be cordial at all times.
11. Do not correct other contributors' spelling or grammar.
12. If a contributor makes a comment that is defamatory or likely to cause extreme offense, edit or remove it where possible. If this is not possible, report it to the operator of the website. Contact the user to explain why you took this action, and if appropriate ask them to post the comment again without the offensive content.
13. All feedback to CTC through social networking sites should be fed back to the Town Clerk, and as appropriate, Full Council. Feedback that requires a response must be acknowledged promptly. Where action is required, bear in mind that excessive delay will have a negative impact on the council's reputation.
14. Passwords for Town Council social media sites must not be shared with any unauthorised persons and these must be changed when a member of staff leaves office.

Authorisation:

Types of posts authorised employees can send out as part of their daily responsibilities from the official CTC Facebook/Instagram account, though discretion will be exercised by the Town Clerk under CTC's adopted Scheme of Delegation:

- Informing the community about upcoming public meetings
- Sending out updates on improvements/changes on the website
- Posting photos after successful events or before to advertise and raise profile

- Giving out relevant advice in situations such as adverse weather, highway matters or road works
- Sending out notices of unavoidable office closures
- Posting photos of improvements around the town, such as cleaned up bus shelters, repainted public areas and Christmas lights.



Desk Review Report: Crediton Town Council Old Landscore School Feasibility Study Review

Reviewed by Devon Communities Together March 2026

1. Introduction

This narrative report presents the findings of a desk-based review of the original 2019 Feasibility Study for the Old Landscore School Building. The purpose of the review was to evaluate the continued relevance, accuracy, and strategic alignment of the existing study, and recommend what areas will need revision, reassessment and rewriting. Across the document, the reviewers have reviewed the key shifts, purpose and rationale, including demographic, political, organisational, structural, and strategic factors. Due to the length of time since the original study was completed, the study now has significant sections that are out-of-date. As a result, the report requires substantial revision rather than light updating.

This narrative synthesises all reviewer comments into a single coherent assessment, outlining gaps, areas for rewriting, and recommendations for the next phase of feasibility work.

2. Overview of Findings

The review reveals a clear conclusion that many sections of the 2019 study is now outdated. The reasons for this include changes in Crediton's demographics, developments in local authority strategies, the condition and status of the Old Landscore School building, and the evolution of CTC and the local community's operational needs. Furthermore, social, health, economic, and community-based services have changed considerably in the intervening years, influenced by wider trends such as the pandemic, cost-of-living crisis, and shifts in local public service provision.



3. Section-Specific Analysis

3.1 History and Current Status of the Building

The original study describes the building's use up to 2019, but this information is now outdated. The building's current condition, recent disuse, and any deterioration or interim works need to be reassessed. A fresh condition assessment, including fabric, utilities, accessibility and compliance, is required before any updated feasibility analysis can be considered robust.

3.2 Rationale for Asset Transfer

The rationale presented in 2019 no longer reflects the local landscape. Changed local circumstances, updated CTC insights and information based on current priorities, and evolving community needs mean that the logic underpinning the original case for asset transfer must now be rewritten.

The original arguments focus on austerity-era pressures, loss of community services from the former Council Offices, and concerns around private sale may require replacement with:

- Updated sectoral pressures
- Current community service gaps
- Post-pandemic shifts in community behaviour
- New strategic objectives held by CTC

The commentary makes clear that this section requires a full re-evaluation, not a simple refresh.

3.3 Demographics and Trends

The demographic data used in the study (Census 2011, older projections, 2013–16 datasets) is now out of date. Reviewers highlight the need for:

- A full demographic review using Census 2021
- Analysis of current IMD data



- Review of JSNA metrics
- Updated projections around population growth, ageing, health inequalities, and social need

Given how central demographic analysis is to justifying community infrastructure investment, this section requires a complete rewrite.

3.4 Localism Agenda and Relevant Legislation

Reviewer comments note that although the Localism Act 2011 remains in force, various elements have been updated or reinterpreted since 2019. Moreover, the discussion in the original report is based on guidance that has since been revised. A more thorough review of current statutory powers, community rights, and updated asset transfer policy is required to ensure accuracy and alignment with today's practice.

3.5 Community Asset Transfer Context

This section requires two major updates:

- 1. Status of the asset transfer**

The position between DCC and CTC may have moved on since this study was written. Any references to DCC's appetite for transfer or the level of engagement must be updated to reflect the current negotiation landscape.

- 2. Dependencies on old evidence**

The section draws on a 2016 feasibility study and other outdated sources. These inputs are no longer reflective of today's community assets, needs or strategic priorities. Reviewers consistently highlight the need to replace these references with up-to-date evidence.



3.6 Crediton Neighbourhood Plan and Local Consultations

Multiple reviewer comments emphasise that:

- The 2015 Neighbourhood Plan consultation findings are outdated.
- A newer NDP may have been developed, or at least progressed, requiring full review.
- The 2016 Local Facilities Assessment is no longer fit-for-purpose and must be replaced with a new market analysis.

Any future feasibility study will need to revisit:

- Community aspirations for space
- Updated consultation data
- Current availability, quality, and pricing of local venues and services

3.7 Strategic Context (CTC and DCC)

The strategic plans referenced, including CTC's 2017–2022 Strategic Plan and DCC's "Better Together" 2014–2020 plan—have both expired. As a result, the current strategies will need to be reviewed and these sections of the report must be completely rewritten.

An updated feasibility study should reflect:

- CTC's current strategic priorities
- DCC's current vision and asset strategy
- Current national policy shifts relating to local government, community assets, public realm, finance and health integration

3.8 Vision for the Old Landscore School Building

It is likely that the vision for the building within CTC will have changed due to the length of time since the original study was conducted. An independently facilitated meeting with CTC and other local stakeholders could be useful to redefine or reconfirm the vision.

This signals:



- The original vision statement may no longer reflect community needs or CTC's organisational direction.
- A structured visioning exercise should be conducted with councillors, stakeholders, and the wider community to establish updated outcomes and priorities.

3.9 SWOT Analysis

The SWOT analysis is now out of date. Many of the originally identified strengths and opportunities may no longer be relevant or accurate, including references to potential anchor tenants such as the Youth Orchestra or assumptions about financial sustainability.

Equally, weaknesses and threats may have changed due to:

- New competition
- Shifts in the local economy
- Changes in community groups' accommodation needs
- Altered building condition
- Evolving governance and operational requirements

A new SWOT must be developed from scratch.

3.10 Recommendations

The closing section, which outlines next steps and recommended budget allocations, also requires a complete rewrite due to the following:

- The required tasks have changed
- Costs are outdated
- The dependency on old research limits the usefulness of the existing recommendations

Any new feasibility pathway should reflect:

- Updated research
- Modern survey requirements (including accessibility and energy efficiency)



- Current costs and inflation
- Revised CAT processes
- New planning, structural, and operational considerations

4. Overall Conclusion

The desk review demonstrates that the original 2019 feasibility study is no longer suitable as a working document. Its content reflects a radically different local, policy and social landscape. A comprehensive rewrite is essential, to include new and updated evidence, updated strategic contributions, refreshed community engagement and accurate demographic and economic data.

In particular, the vision, rationale, demographic analysis, CAT status, SWOT analysis, strategic alignment, and next steps all require updating and reassessment. The recommended approach is not to make piecemeal edits but to develop an entirely updated feasibility study grounded in current evidence and data.

5. Recommendations for Next Steps

Based on reviewer comments and gaps identified, a list of recommendations of next steps are below. Where appropriate, DCT have noted which aspects of work they could support with if further commissioning is required and agreed.

1. **Complete updated demographic and economic analysis (DCT can support with this via a desk review and engagement with CTC)**
2. **Conduct a building condition and compliance survey**
3. **Run a revised visioning workshop with CTC and other stakeholders as appropriate (DCT can support with this via organising and facilitating a workshop)**
4. **Undertake new community and stakeholder engagement analysis (DCT can support with this via a desk review and updated feasibility study project)**
5. **Refresh the strategic alignment with current CTC and DCC plans (DCT can support with this if required, via a desk review of the current strategies)**



6. **Develop a new SWOT and options appraisal (DCT can support with this within a feasibility study update project)**
7. **Prepare an updated feasibility report for 2026 (DCT can support with this and incorporate the above actions within a quote)**
8. **Based on the revised feasibility study, develop a business plan and funding plan for future development of the project. (DCT can support with this via a business plan development project and funding plan development project)**

Dear Chairman/Secretary/ Whom it may concern

Mid Devon District Council (the "Council"), is consulting with you regarding proposals to implement a Public Space Protection Order (PSPO) to prohibit the consumption of alcohol within Crediton town centre.

Public Spaces Protection Orders were introduced to enable local councils to address anti-social behaviour (ASB) in their areas. Councils can use PSPOs to prohibit specified activities, and/or require certain things to be done by people engaged in particular activities, within a local area. Failure to comply with a PSPO prohibition or requirement is an offence and a person (without reasonable excuse) will be liable on summary conviction to a fine.

A person who fails without reasonable excuse to comply with a requirement imposed on him or her by an Authorised Person, Police Constable or PCSO given under: -

- (a) Article 2.1 and article 2.2 of the Order commits an offence, which, on summary conviction in magistrates court, attracts a fine not exceeding level 2 on the standard scale (currently £500)

- (b) Article 2.3 and article 2.4 of the Order commits an offence, which, on summary conviction in magistrates court, attracts a fine not exceeding level 3 on the standard scale (currently £1,000).

A Fixed Penalty Notice may be issued by an Authorised Officer, Police Constable or PCSO to anyone believed to have committed an offence under this Order. The Fixed Penalty shall be £100.00. Payment of £50.00 of the Fixed Penalty within 14 days from the date of the Fixed Penalty Notice will discharge the liability for prosecution.

The proposed PSPO will include: -

- (a) The consumption of alcohol or anything an Authorised Officer, Police Constable or PCSO reasonably believes to be alcohol in breach of any of the above person's request to cease its consumption

- (b) Having an unsealed container of alcohol or anything an Authorised Officer, Police Constable or PCSO reasonably believes to be alcohol in breach of any of the above person's request to surrender it

- (c) Consuming alcohol or anything an Authorised Officer, Police Constable or PCSO reasonably believes to be alcohol and behaving (either individually or in a group of two or more people) in a manner that has caused or is likely to cause a member of the public to suffer harassment, alarm or distress by that behaviour

Having breached prohibitions, remaining in Crediton Town Centre Land, when ordered to leave the area either immediately or by such time as may be specified and in such a manner as may be specified by an Authorised Officer, Police Constable or PCSO.

Offences and Penalties

An Authorised Person, Police Constable or PCSO who reasonably believes that a person is consuming (or intends to consume) alcohol whilst present within the area designated as Crediton Town Centre Land has the power to require them: -

(a) to not consume the alcohol or anything they believe to be alcohol in breach of this Order; and/or,

(b) to surrender anything in their possession which they reasonably believe to be alcohol or a container for alcohol. This can then be disposed of in whatever way is deemed appropriate.

An Authorised Person, Police Constable or PCSO who reasonably believes that a person has acted, or is likely to act, in a manner that has caused or is likely to cause a member of the public to suffer harassment, alarm or distress by that behaviour while present within the area designated as Crediton Town Centre Land has the power to require them: -

(a) to leave the area either immediately or by such time as may be specified and in such a manner as may be specified

For these powers to be valid, the Authorised Person, Police Constable or PCSO must: -

(a) Inform the person that a failure to comply with a requirement (without reasonable excuse) will be an offence

(b) Show evidence of their authorisation if asked to do so

A copy of the order is attached to this letter, however, If you would prefer a hard copy of the Order it can be sent to you at your request.

The Council would like to formally consult with you regarding proposals to implement the Order. The Council is formally required to consult with you under section 72A (3) and (4) of the Anti-Social Behaviour, Crime and Policing Act 2014. It sets out the text of those subsections below.

3) A local authority must carry out the necessary consultation and the necessary publicity, and the necessary notification (if any), before: -

(a) making a public spaces protection order;

(b) extending the period for which a public spaces protection order has effect; or

(c) varying or discharging a public spaces protection order.

(4) In subsection (3)—

the necessary consultation means consulting with: -

(a) the Chief Officer of Police, and the local policing body, for the police area that includes the restricted area;

(b) whatever community representatives the local authority thinks it appropriate to consult;

(c) the owner or occupier of land within the restricted area.

Find enclosed a copy of the proposed order.

Please respond to this invitation to consultation by the 5th May 2026.

If you fail to respond by this date decisions may be made without your views being taken into account.

THE ANTI-SOCIAL BEHAVIOUR, CRIME AND POLICING ACT 2014

SECTION 59

Mid Devon (Public Spaces Protection) (Crediton Alcohol and Anti-Social Behaviour Prohibition) Order 2026

Introduction

Mid Devon District Council (the “Council”) in exercise of its powers under section 59 and 72 of the Anti-Social Behaviour Crime and Policing Act 2014 (the “Act”), and all other enabling powers, hereby makes this Order.

This Order shall be cited as the “Mid Devon (Public Spaces Protection) (Crediton Alcohol and Anti-Social Behaviour Prohibition) Order 2026”.

This Order comes into force on the day of 2026 for a period of three (3) years.

1. Definitions and Interpretations

- 1.1 In the following provisions of this Order the following terms shall have the meanings hereby respectively ascribed to them: -

“Authorised Officer” means a person authorised in writing by the Council to enforce this Order

“Plan” means the plan attached to this Order

“Police Constable” means any person lawfully designated and authorised by a Chief Officer of Police to exercise the powers of a Police Constable

“Crediton Town Centre Land” means all the land within the area shown edged red on the Plan which is open to the air (including covered land which is open on at least one side) and to which the public are entitled and permitted to have access, with or without payment

“PCSO” means a Police Community Support Officer

- 1.2 Except when the context otherwise requires, the singular includes the plural and vice-versa; and the masculine includes the feminine and vice-versa.
- 1.3 Reference to an Act of Parliament, statutory provision or statutory instrument includes a reference to that Act of Parliament, statutory provision or statutory instrument as amended, extended or re-enacted from time to time and to any regulations made under it.

2. Prohibited Activities

- 2.1 The consumption of alcohol or anything an Authorised Officer, Police Constable or PCSO reasonably believes to be alcohol in breach of any of the above person's request to cease its consumption.
- 2.2 Having an unsealed container of alcohol or anything an Authorised Officer, Police Constable or PCSO reasonably believes to be alcohol in breach of any of the above person's request to surrender it.
- 2.3 Consuming alcohol or anything an Authorised Officer, Police Constable or PCSO reasonably believes to be alcohol and behaving (either individually or in a group of two or more people) in a manner that has caused or is likely to cause a member of the public to suffer harassment, alarm or distress by that behaviour.
- 2.4 Having breached prohibitions 2.1, 2.2 or 2.3, remaining in Crediton Town Centre Land, when ordered to leave the area either immediately or by such time as may be specified and in such a manner as may be specified by an Authorised Officer, Police Constable or PCSO.

3. Offences and Penalties

- 3.1 An Authorised Person, Police Constable or PCSO who reasonably believes that a person is consuming (or intends to consume) alcohol whilst present within the area designated as Crediton Town Centre Land has the power to require them: -
 - (a) To not consume the alcohol or anything they believe to be alcohol in breach of this Order; and/or
 - (b) To surrender anything in their possession which they reasonably believe to be alcohol or a container for alcohol. This can then be disposed of in whatever way is deemed appropriate.
- 3.2 An Authorised Person, Police Constable or PCSO who reasonably believes that a person has acted, or is likely to act, in a manner that has caused or is likely to cause a member of the public to suffer harassment, alarm or distress by that behaviour while present within the area designated as Crediton Town Centre Land has the power to require them:-
 - (a) To leave the area either immediately or by such time as may be specified and in such a manner as may be specified
- 3.3 For these powers to be valid, the Authorised Person, Police Constable or PCSO must:
 - (a) Inform the person that a failure to comply with a requirement (without reasonable excuse) will be an offence
 - (b) Show evidence of their authorisation if asked to do so

- 3.4 A person who fails without reasonable excuse to comply with a requirement imposed on him or her by an Authorised Person, Police Constable or PCSO given under: -
- (a) Article 2.1 and article 2.2 of this Order commits an offence, which, on summary conviction, attracts a fine not exceeding level 2 on the standard scale (currently £500)
 - (b) Article 2.3 and article 2.4 of this Order commits an offence, which, on summary conviction, attracts a fine not exceeding level 3 on the standard scale (currently £1,000)
- 3.5 A Fixed Penalty Notice may be issued by an Authorised Officer, Police Constable or PCSO to anyone believed to have committed an offence under this Order. The Fixed Penalty shall be £100.00. Payment of the Fixed Penalty of £50.00 within 14 days from the date of the Fixed Penalty Notice will discharge the liability for prosecution.

4. Exemptions

- 4.1 Nothing in this Order shall apply to: -
- (a) Premises authorised by a premises licence to be used for the supply of alcohol
 - (b) Premises authorised by a club premises certificate to be used by the club for the supply of alcohol
 - (c) A place within the curtilage of premises within paragraph (a) or (b)
 - (d) Premises which by virtue of Part 5 of the Licensing Act 2003 may at the relevant time be used for the supply of alcohol or which, by virtue of that Part, could have been so used within 30 minutes before that time
 - (e) A place where facilities or activities relating to the sale or consumption of alcohol are at the relevant time permitted by virtue of a permission granted under section 115 of the Highways Act 1980 (highway related issues)
 - (f) Council-operated licensed premises or land when the premises or land are being used for the supply of alcohol, or within 30 minutes of the end of the period during which the premises have been used for the supply of alcohol

5. Reasons for the Order

- 5.1 The Council is satisfied that the two conditions below have been met, in that: -
- (a) Activities of consumption of alcohol and any resulting anti-social behaviour carried on in the Crediton Town Centre Land have had a

detrimental effect on the quality of life in that area, or it is likely that these activities will be carried on in the Crediton Town Centre Land and they will have such an effect

- (b) The effect, or likely effect, of the said activities is, or is likely to be, of a persistent or continuing nature, such as to make the activities unreasonable, and justifies the restrictions imposed by the Order

6. Appeals

- 6.1 Any challenge to this Order must be made at the High Court by an interested person within six (6) weeks of it being made. An interested person is someone who lives in, regularly works in or visits the restricted area. This means that only those who are directly affected by the restrictions have the right to challenge. The right to challenge also exists where an order is varied by the Council.
- 6.2 Interested persons can challenge the validity of the Order on two grounds: that the Council did not have the power to make the Order or to include particular prohibitions or requirements; or that one of the requirements of the legislation, for instance consultation, has not been complied with.
- 6.3 When an application is made, the High Court can decide to suspend the operation of the Order pending the Court's decision, in part or in whole. The High Court can uphold, quash or vary the Order.

Dated

THE COMMON SEAL of MID DEVON

DISTRICT COUNCIL

was hereunto affixed

in the presence of

Authorised Signatory

Seal Number