

# Grimoldby and Manby Parish Council

## To the Members of the Parish Council of Grimoldby and Manby:

You are hereby summoned to attend a meeting of Grimoldby and Manby Parish Council, which will be held on Wednesday 18<sup>th</sup> February 2026 in The Pavilion, Gibson Way, Manby at 7.30pm. The business to be dealt with at the meeting is listed in the agenda below.

**Please note that the meeting will begin at 7.30pm UNLESS any public are present in which case there will be a public forum when members of the public may ask questions or make short statements to the Council.**

Any public wishing to speak, on an agenda item or "sit in" on the meeting please contact the Clerk, using the email address below, in advance to discuss attendance arrangements. Written representation, rather than attending in person, is accepted.

Members of the public should note that they will not be allowed to speak during the formal meeting.

*L.M. Phillips*

**Mrs. L.M. Phillips**

**Clerk**

Dated this 13<sup>th</sup> Day of February 2026

## AGENDA

- 1. Apologies for Absence**  
To note apologies where valid reasons for absence have been given to the Clerk prior to the meeting.
- 2. Chairman's Remarks**
- 3. Declarations of Interest / Dispensations**  
To receive declarations of interest in accordance with the Localism Act, 2011 – these being **any** interest in agenda items not previously recorded on Members' Register of Interests. Council to consider granting dispensation(s), as per written requests received by the proper officer to councillors under section 22 of the Localism Act.
- 4. Council Minutes**  
To approve as a correct record the draft Minutes of the Council Meeting held on 21<sup>st</sup> January 2026 and authorise the Chairman to sign the official minutes.
- 5. Finance**  
To receive, note and duly resolve to authorise:
  - a. The Financial Report for February showing a closing balance on 5<sup>th</sup> January 2026 of £73,541.26 which agrees to the closing balance on the bank statement issued on 14<sup>th</sup> January 2026.
  - b. Cheques for payment, listed on the Cheque Schedule 021826 totalling £6,213.92.
- 6. Planning**
  - a. **Applications received by the Local Planning Authority**  
To consider current applications / ratify comments already made by the Planning Working Group. There were no applications to consider at the time of printing.
  - b. **Planning Decisions**
    - i. 03498/25/RES – Reserved matters – Rose Cottage, Priory Lane, LN11 8SP – ELDC Approved.
    - ii. 03309/25/LBA – Listed Building Consent – Tedder Hall, Manby Park, LN11 8UP – ELDC Approved.
    - iii. 02541/25/OUT – Outline Erection – Land Adjacent to Bilney and Bowen House, Manby Park, LN11 8UT – ELDC Refused.
  - c. **Temporary Traffic Restrictions**
    - i. Organisation responsible for restriction: Anglian Water  
Reason for restriction: Water main repairs  
Nature and location of restriction: Road closure Order - St Marys Crescent (Between Chapel Lane & a point 40m South)  
Period of restriction: 16/03/2026 - 18/03/2026  
(Restrictions to be implemented for 3 days as and when required during this period, signage detailing accurate dates and times will be displayed on site in advance)

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7. **Play Park**  
Council to consider a request from a member of the public to install 'No Dogs' signage.
8. **Allotments**  
Council to consider an amendment to the water clause in its Tenancy Agreement prior to renewal of agreements on 1<sup>st</sup> April 2026.
9. **IT Policy**  
Council to approve the above for adoption and use.
10. **GDPR**  
Further to review of its other GDPR policies and documentation in June 2025, Council to review its Data Map and Appropriate Data Policy and approve for use.
11. **Code of Conduct**  
Council to approve continued use of the above, with no amendments, which can be viewed on the Council's website at: <https://grimoldby-manby.parish.lincolnshire.gov.uk/homepage/governance>
12. **Investment Policy**  
Council to review its Investment Policy and approve for future use.
13. **Closed Session Item**  
To consider moving into closed session in accordance with the Public Bodies (Admission to Meetings) Act 1960 due to the business to be discussed in the following item, information being of a third party, commercial and confidential nature in relation to the award of Village Maintenance work in 2026/27.
14. **Any Other Business**  
Councillors to exchange information, if required. Please note, no decisions may lawfully be taken during this item.
15. **Next Meeting**  
Council to note that the next scheduled Council meeting will take place on 18<sup>th</sup> March 2026.

**MINUTES OF THE MEETING OF GRIMOLDBY AND MANBY PARISH COUNCIL  
HELD AT THE PAVILION, GIBSON WAY, GRIMOLDBY  
ON WEDNESDAY 21<sup>st</sup> JANUARY 2026**

**Present** Councillor T. Knowles (TK) (in the chair)

**Councillors:** Mrs. E. Billings (EB), R. Hampton (RH), N. Hind (NH), Mrs. L. Knowles (LK), M. Starsmore (MS), T. Vamplew (TV)

**Councillors not present:** C. Fairburn (CF) and M. Bruce (MB)

The Clerk, Mrs. L.M. Phillips and one member of the public were also present.

One member of the public spoke in the public forum to explain the planning application that he had made.

**T97. Apologies for Absence**

Apologies for absence were received from Cllr. CF.

**T98. Chairman's Remarks**

The Chairman reported that he had given the Council £2,000 from his East Lindsey Councillor funds for use on a new speed sign. He had also given £2,000 to local churches. Beech Grove was very quiet, there might be a meeting coming up in the next few weeks with developers, the Heritage people were still insisting that any development must use the existing building. Cllrs. TV and TK had attended a meeting regarding the Angus or old Wingas situation. He confirmed they would keep their eye on what was happening, there was nothing that would affect Grimoldby and Manby yet.

**T99. Register of Interests**

Councillors were reminded to review their declaration of interest forms, complete new ones if changes were needed and submit to the Clerk/ELDC.

**T100. Declarations of Interest / Dispensations**

Cllr. NH declared an interest in agenda item 11. as an allotment holder.

**T101. Council Minutes**

It was proposed, seconded and **RESOLVED** to approve as a correct record the Minutes of the Council Meeting held on 19<sup>th</sup> November 2025.

**T102. Finance**

It was proposed, seconded and **RESOLVED** that the Council should receive, note and duly authorise the following:

- a. The Financial Report for December showing a closing balance on 4<sup>th</sup> November 2025 of £77,286.22 which agreed to the closing balance on the bank statement issued on 14<sup>th</sup> November 2025.
- b. The Financial Report for January, showing a closing balance on 8<sup>th</sup> December 2025 of £75,740.96 which agreed to the closing balance on the bank statement issued on 12<sup>th</sup> December 2025.
- c. Cheques for payment, listed on the Cheque Schedule 012126 totalling £4,113.23 and in addition the Clerk was authorised to write a cheque in payment for the new Speed Sign.
- d. Budget Variance Report to 31<sup>st</sup> December 2025.
- e. Cashbook Record of Payments and Receipts for Months 1 to 9.

**T103. Planning**

**a. Applications received by the Local Planning Authority**

The Council considered current applications including those listed in the schedule (Plans\_01\_21\_26) / ratified comments already made by the Planning Working Group and it was proposed, seconded and **RESOLVED:**

- i. 03641/25/FUL - Despite the applicant seemingly receiving support for this development in pre-application enquiries there are still some reservations :
  1. the Ecological Appraisal has sections 'blacked out' and so preventing the making of observations. There may be good reasons for this but we should have clarification.
  2. the maps attached to the Appraisal are copied in reverse/transposed and are confusing - please rectify.
  3. the proposed site is outside and beyond the established development in Church Lane

and projects and encroaches into the open countryside. It may be considered that the development will have a detrimental effect on the rural character.

4. the bungalow design is modest and will provide limited contribution to the local housing supply and will not outweigh the adverse effect on the rural setting.
5. the proposed screening method is vague and no guarantee it will prove to be effective or at all.
6. this is tandem development with a potentially inadequate access.
7. given the proximity of historical buildings there should be a full archaeological survey undertaken beforehand.
8. we have not seen the responses of other consultees as yet.

The application cannot be supported at this time.

In the event of planning permission being granted appropriate conditions should be imposed given its unusual position and additionally to ensure the screening is in place and adequately maintained at the start and in the future.

- ii. 03699/25/FUL - comment that a previous application on this site was refused and an appeal subsequently dismissed. This current application differs from the previous application as regards siting, absence of stabling and menage.

The site suggests potential for a sensitive development and subject to any observations from neighbours/planners/co-consultees the Parish Council would tend to be supportive of the application.

If granted, the permission should include suggested conditions:

1. Middlesykes Lane is a narrow road with no footpath and has significant traffic flow therefore any materials and construction vehicles should be deposited /parked within the site to avoid causing obstruction to traffic.
2. An archaeological survey should be undertaken before building works are commenced, given the historical interest in the area.

**b. Planning Decisions**

The Council noted the following planning decision:

- i. 02005/25/RES – Reserved matters – Land North of Mill Lane, Grimoldby, LN11 8TB – ELDC Refused.

**T104. Proposed Works to Trees**

It was proposed, seconded and **RESOLVED** to ratify the comments submitted by the planning working group relating to the application below:

- a. **Proposals:** T1 - Beech - Fell to ground level T2 - Beech - Reduce canopy height from 24m leaving 19m. Reduce canopy spread all round from 9m to 5m from the main stem. **Location:** The Orchards, Carlton Road, Manby, LN11 8UF. **Reason(s):** T1 - Tree is in decline with visible signs of *Meripilus Giganteus* at the base. Signs of beech bark disease on main stem. T2 - Cutting back to viable secondary growth points and following natural flowing lines. Reason being this tree has a large wound at the base and reducing the canopy will reduce the amount of weight and wind sail. **Comments:** Leave a decision to the ELDC Tree Officer.

**T105. Play Park**

**a. Inspection**

It was proposed, seconded and **RESOLVED** to approve that the Clerk make the necessary arrangements for the above's Annual Inspection with the equipment provider.

**b. Signage**

The Council considered a request from a member of the public to install 'No Dogs' signage. It was proposed, seconded and **RESOLVED** to defer this matter until checks of current signage could be confirmed. Clerk also to contact Wickstead.

**T106. Amenity Grass Cutting**

The Council received correspondence from LCC and resolved to delegate authority to the Town Clerk to complete the necessary paperwork, unless she felt that further consideration was required by Council.

**T107. Allotments**

The Council reviewed the rent chargeable and contents of the Tenancy Agreement prior to renewal of agreements on 1<sup>st</sup> April 2026. It was proposed, seconded and **RESOLVED** to warn Allotment Holders that the price would increase in 2027 by £5 and that in 2026/27 point 19 of the Tenancy Agreement should be amended to include reference to leaving the plot in a condition satisfactory to the Council.

**T108. Council Debit Card**

It was proposed, seconded and **RESOLVED** to approve that a Council Debit Card be obtained.

**T109. Website Accessibility**

The Council noted that one of the criteria to enable a “yes” answer to the new assertion 10 on the AGAR 2025/26 was that the Council demonstrate that its website had been checked for accessibility, publish an accessibility statement on its website and continue to check and make changes where necessary. It was proposed, seconded and **RESOLVED** that expenditure should be approved by the Clerk on obtaining an independent check and any software required to ensure compliance.

**T110. Sexual and General Harassment Training**

Following the introduction of new legislation which placed greater responsibilities and legal requirements on all Employers (which includes each individual Councillor) to take proactive steps to prevent sexual harassment at work and the adoption of a policy, reviewed for use by the Council on 19<sup>th</sup> November 2025 (no changes made). Councillors watched a short training video on the above and signed to confirm that they had received, read, understood and would abide by the policy.

**T111. Any Other Business**

Cllr. NH asked if anyone had heard that the cattle farm in Louth was to be moved to Manby. Others had heard this rumour and thought it was because planning permission for over 300 homes had been approved by ELDC on the existing cattle farm land in Louth. It was agreed that Cllrs. would bring back any further information regarding this, if they came across it.

**T112. Next Meeting**

The Council noted that the next scheduled Council meeting would take place on 18<sup>th</sup> February 2026.

The meeting closed at 8.57pm

Signed \_\_\_\_\_ (Chairman)      Dated \_\_\_\_\_

**Financial Report - February 2026**

			£	£
Opening balance as at 12th December 2025				75,740.96
ADD receipts				
FPI	Smith YC	Pavilion Rent Dec		28.00
DEP	Honeysuckle Club	Pavilion Rent		70.00
				<u>75,838.96</u>
LESS payments				
1549	D&D Engineering (Lincs) Ltd	Repair to 2 x grids at play park	96.00	
1582	HMRC	Employer Costs October	246.12	
1583	Mr. K. Towler	Village Maintenance October	520.00	
1584	MG Ubique Ltd	Allotment Fence (CHQ CANCELLED)	-	321.60
1585	Dave Skells TM Ltd	October Amenity Grass Cut	246.00	
1586	Adrip Plumbing Ltd	Boiler Service	85.00	
1589	Unipart Rail Ltd	Replacement Speed Sign Battery	338.40	
1590	G&M1	Employee Costs November	705.40	
1591	HMRC	Employee Costs November	246.12	
1592	Mr. K. Towler	Village Maintenance November	520.00	
1593	British Gas Trading Ltd	Pavilion Electricity	121.15	
1594	G&M1	Employee Costs December	705.40	
1595	HMRC	Employee Costs December	246.12	
1596	Mr. K. Towler	Village Maintenance December	520.00	
1597	Mrs. L. Phillips	Reimbursement for Defibrillator Pads and Battery	131.64	
1598	SLCC	Annual Membership	379.00	
1599	MG Ubique Ltd	Allotment Fence (re-issued)	321.60	
1600	Westcotec Ltd	Speed Sign	4,420.80	
1601	G&M1	Employee Costs January	705.60	
1602	HMRC	Employee Costs January	245.95	
1603	Mr. K. Towler	Village Maintenance Costs January	520.00	
	Lloyds	Bank Charges Ref: 474228163	7.75	
			<u>11,006.45</u>	
ADD Uncleared Cheques				
1549	D&D Engineering (Lincs) Ltd	Repair to 2 x grids at play park	96.00	
1582	HMRC	Employer Costs October	246.12	
1584	MG Ubique Ltd	Allotment Fence CHQ CANCELLED	-	321.60
1585	Dave Skells TM Ltd	October Amenity Grass Cut	246.00	64,832.51
1591	HMRC	Employee Costs November	246.12	
1594	G&M1	Employee Costs December	705.40	
1595	HMRC	Employee Costs December	246.12	
1596	Mr. K. Towler	Village Maintenance December	520.00	
1597	Mrs. L. Phillips	Reimbursement for Defibrillator Pads and Battery	131.64	
1598	SLCC	Annual Membership	379.00	
1599	MG Ubique Ltd	Allotment Fence (re-issued)	321.60	
1600	Westcotec Ltd	Speed Sign	4,420.80	
1601	G&M1	Employee Costs January	705.60	
1602	HMRC	Employee Costs January	245.95	
1603	Mr. K. Towler	Village Maintenance Costs January	520.00	
			<u>8,708.75</u>	
Closing balance as at 5th January 2026				<u>73,541.26</u>

**Cheque Schedule 021826**

January 2026							
Cheque No.	Supplier / Payee	Details	Cheque Total	Invoice Total	VAT	Net	Ref
1599	MG Ubique Ltd	Allotment Fence (chq re-issued)	321.60	321.60	53.60	268.00	
1600	Westcotec Ltd	Speed Sign	4,420.80	4,420.80	736.80	3,684.00	17503
<b>TOTAL</b>			<b>4,742.40</b>	<b>4,742.40</b>	<b>790.40</b>	<b>3,952.00</b>	

February 2026							
Cheque No.	Supplier / Payee	Details	Cheque Total	Invoice Total	VAT	Net	Ref
1601	G&M1	Employee Costs January	705.60	705.60	-	705.60	
1602	HMRC	Employee Costs January	245.92	245.95	-	245.95	
1603	Mr. K. Towler	Village Maintenance January	520.00	520.00	-	520.00	
<b>TOTAL</b>			<b>1,471.52</b>	<b>1,471.55</b>	<b>-</b>	<b>1,471.55</b>	

<b>TOTALS</b>			<b>6,213.92</b>	<b>6,213.95</b>	<b>790.40</b>	<b>5,423.55</b>	
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# Grimoldby and Manby Parish Council

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## IT POLICY

### Purpose of the IT Policy

The purpose of this IT policy is to establish clear parameters for how councillors, staff, and other authorised users use council-provided technology or equipment in the course of their duties. A well-defined policy helps to:

- Set expectations for appropriate use of equipment and systems;
- Raise awareness of risks associated with IT use;
- Safeguard the council's data and digital assets;
- Clarify what constitutes acceptable and unacceptable use;
- Outline the consequences of policy breaches.

### Monitoring of IT Use

As an IT provider, the council has the right to monitor the use of its IT equipment and systems, provided there is a legitimate reason for doing so and councillors, employees and other authorised users are informed that such monitoring may take place. Any monitoring must be proportionate and comply with relevant data protection and privacy laws. Other persons may be included if they access or use council systems e.g. if they have a council e-mail address

### Scope of this policy

This policy applies to all councillors, staff, and other authorised users, regardless of their working location or pattern, including those who are home-based, office-based, or work on a flexible or part-time basis. It sets out the expectations for the appropriate use of IT equipment and systems provided by the council.

### Computer use

#### 1 Hardware

- 1.1** Council computer equipment is provided for council purposes, however reasonable personal use is permitted (reasonable interpreted as in the opinion of the clerk). Any personal use of our computers and systems should not interrupt our daily council work in any way. Councillors, staff, and other authorised users are asked to restrict any personal use to official lunch breaks or before or after working hours.
- 1.2** All councillors, staff, and other authorised users must lock their computers when leaving their desks to prevent unauthorised access. This applies to all council and personal devices used for work. Failure to comply may lead to disciplinary action.
- 1.3** All computer and other electronic equipment supplied should be treated with good care at all times. Computer equipment is expensive, and any damage sustained to any equipment will have a financial impact on the council.
- 1.4** Computer and electronic hardware should be kept clean, and every precaution taken to prevent food and drink being dropped or spilled onto it.
- 1.5** All computer and mobile equipment will carry a number which is logged against the current owner of that equipment. A database of equipment issued will be kept.
- 1.6** Equipment should not be dismantled or reassembled without seeking advice.
- 1.7** Councillors, staff, and other authorised users are not to purchase any computer or mobile equipment (including software). Unless previously authorised.
- 1.8** Personal disks, USB stick, CDs, DVDs, data storage devices etc., cannot be used on council computers without the prior approval of the council.

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## 2 Equipment

### 2.1 Portable equipment

- 2.1.1 Portable equipment includes laptop computers, netbooks, tablets, mobile and smart phones with email capability and access to the internet etc.
- 2.1.2 It is particularly emphasised that council back-up procedures specific to portable equipment should be followed at all times.
- 2.1.3 All portable computers must be stored safely and securely when not in use ~~in the office~~, i.e. when travelling or when working from home. Portable equipment (unless locked in a secure cabinet or office) should be kept with or near the user at all times; should not be left unattended when away from council premises and should never be left in parked vehicles ~~or at any council or non-council premises~~.
- 2.1.4 It is important to ensure that all portable devices are protected with encryption in case they are lost or stolen. All smartphones or tablets that hold council data, including emails and files, must be protected with a pin code. Where possible, these devices should also be programmed to erase all content after several unsuccessful attempts to break in. Any security set on these devices must not be disabled or removed.
- 2.1.5 Multi-Factor Authentication (MFA) is a security process that requires users to verify their identity using two or more independent methods—for example, entering a password (something you know) and confirming a code sent to your mobile device (something you have). This significantly reduces the risk of unauthorised access to systems and sensitive data. NALC recommends implementing MFA as a best practice to enhance information security and support compliance with data protection obligations under the UK GDPR and the Data Protection Act 2018.
- 2.1.6 If an item of portable equipment is lost or damaged this should be reported to the Clerk. If the loss or damage is due to an act of negligence, the individual responsible may be liable to meet the first £100 of the loss/damage.
- 2.1.7 To protect confidential information, unless it is a requirement of the job and this has been authorised, it is forbidden for photographs or videos to be taken on council premises, without the prior written permission of the council. This includes mobile telephones with camera function, camcorder, tape or other recording device for sound or pictures - moving or still.
- 2.1.8 Under no circumstances should any non public meeting or conversation be recorded without the permission of those present. This does not affect statutory rights (under The Openness of Local Government Regulations 2014).
- 2.1.9 In addition, the council does not permit webcams (which may be pre-installed on many laptops) to be used in the workplace, other than for conference calls for council purposes. If there is any doubt as to whether a device falls under this clause, advice should be sought from the Clerk.

### 2.2 Use of own devices

- 2.2.1 The Council recognises that some councillors, staff, and other authorised users may wish to use their own smartphones, tablets, laptops etc., to access it's servers, private clouds or networks for normal council purposes, including, but not limited to, reading their emails or to access data in other services. Any such use of personal devices will be at the discretion of the council, but consent for standard systems (MS Windows, Mac OS X, Linux - in commercial configurations) will normally be permitted. Such devices should be kept up to date so that any vulnerabilities in the operating system or other software on the device are appropriately patched or updated.
- 2.2.2 However, the same security precautions apply to personal devices as to the council's desktop equipment. For continuity purposes, calls made to external parties (such as contractors) must be made on council

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landlines or mobile phone numbers to ensure that only these numbers are used and/or stored by the recipient, rather than personal numbers. Any emails sent from own devices should be sent from a council email account and should not identify the individual's personal email address.

- 2.2.3** Councillors, staff, and other authorised persons that use council systems are expected to use all devices in an ethical and respectful manner and in accordance with this policy. Accessing inappropriate websites or services on any device via the IT infrastructure that is paid for or provided by the council carries a high degree of risk, and, for employees, may result in disciplinary action, including summary dismissal (without notice). For Workers or Contractors, we may terminate the worker agreement. This is irrespective of the ownership of the device used. An example would be downloading copyright music illegally or accessing pornographic material.
- 2.2.4** In cases of legal proceedings against the council, the council may need to temporarily take possession of a device, whether council-owned or personal to retrieve the relevant data.
- 2.2.5** Wherever possible the user should maintain a clear separation between the personal data processed on the council's behalf and that processed for their own personal use, for example, by using different apps for council and personal use. If the device supports both work and personal profiles, the work profile must always be used for work-related purposes.
- 2.2.6** Councillors, staff, and other authorised users who intend to use their own devices via the council's infrastructure must ensure that they:
- 2.2.6.1** use a 6-digit pin, strong password (i.e., one which uses three random words (e.g., PurpleCandleRiver) or finger print (preferably the latter) to protect their device(s) from being accessed. For smartphones and tablets this should lock the device after 3 failed login attempts;
  - 2.2.6.2** configure their device(s) to automatically prompt for a password after a period of inactivity of more than 3 minutes;
  - 2.2.6.3** always password protect any documents containing confidential information that are sent as attachments to an email, and notify the password separately (preferably by a means other than email);
  - 2.2.6.4** for smartphones and tablets, activate the automatic device wipe function (where available). Note that use of the remote wipe function may also involve the removal of the individual's personal data. Councillors, staff, and other authorised users are therefore advised to keep personal data separate from council data where possible;
  - 2.2.6.5** ensure secure WiFi networks are used;
  - 2.2.6.6** ensure that work-related data cannot be viewed or retrieved by family or friends who may use the device;
  - 2.2.6.7** inform the clerk if their device(s) is/are lost, stolen, or inappropriately accessed where there is risk of access to council data or resources. To prevent phones being used, they will need to retain the details of their IMEI number and the SIM number of the device as their provider will require this to deactivate it.
- 2.2.7** Personal information and sensitive data should never be saved on councillors, staff, or other authorised users own devices as this may breach confidentiality agreements, especially if the device is used by other people from time to time.
- 2.2.8** If removable media are used to transfer data (e.g. USB drives or CDs), the user must also securely delete the data on the media once the transfer is complete.
- 2.2.9** Councillors, staff, and other authorised users who open any attachments should ensure that any cached copies are deleted immediately after use. The Clerk will provide assistance or training in doing this if needed. Additional risks include data belonging to the council being accessed by unauthorised persons if the device(s) is lost, stolen, or used without the owner's permission.

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- 2.2.10 Any work done on user's own equipment should be stored securely and password protected and should always be backed up in accordance with the council's standard backup procedures.
- 2.2.11 Prior to the disposal of any device that has work data stored on it, and in the event of a user leaving the council, councillors, staff, and other authorised users are required to allow the Clerk access to the device to ensure that all passwords, user access shortcuts and any identifiable data are removed from the device.
- 2.2.12 Councillors, staff, and other authorised users must take responsibility for understanding how their device(s) work in respect to the above rules if they are accessing council servers/services via their own IT equipment. Risks to the user's personal device(s) include data loss as a result of a crash of the operating system, bugs and viruses, software or hardware failures and programming errors rendering a device inoperable. The council will use reasonable endeavours to assist, but councillors, staff, and other authorised users are personally liable for their own device(s) and for any costs incurred as a result of the above.

## 3 Health and safety

- 3.1 Councillors, staff, and other authorised users who work in council offices will be provided with an appropriate workstation.
- 3.2 The council has a duty to ensure that regular appropriate eye tests, carried out by a competent person, are offered to employees using display screen equipment.
- 3.3 Any VDU user who feels that their workstation requires changes to make it compliant must speak to the Clerk.
- 3.4 If any hazards are detected at a workstation, including 'noises' from the IT equipment, this should be reported immediately to the Clerk.

## 4 Password and Authentication Policy

- 4.1 All user accounts must be protected by strong, secure passwords. The council follows the National Cyber Security Centre (NCSC) recommendations for creating passwords using three random words (e.g. PurpleCandleRiver). This method helps create passwords that are both strong and easy to remember, while offering effective protection against common cyber threats such as brute-force attacks. This approach is endorsed in NALC guidance.
- 4.2 In addition to strong passwords, Multi-Factor Authentication (MFA) should be enabled wherever possible. MFA requires users to provide two or more independent forms of verification—for example, a password (something you know) and a code sent to your phone (something you have). This significantly reduces the risk of unauthorised access to systems and personal data.
- 4.3 To further strengthen account security:
  - 4.3.1 Initial user account passwords must be generated by the IT provider.
  - 4.3.2 Default passwords provided by vendors or the IT provider must be changed immediately upon installation or setup.
  - 4.3.3 Service or System (e.g. Website) account passwords are generated and managed by the IT provider.
  - 4.3.4 The council recommends these practices as part of its commitment to robust information security and to support compliance with the UK GDPR and the Data Protection Act 2018.
  - 4.3.5 For more guidance, see the NCSC's advice on password security: [NCSC Password Guidance](#)

### 4.4 Access to Passwords

- 4.4.1 Passwords are personal and must not be shared under any circumstances.
- 4.4.2 Only the assigned user of an account may access or use the associated password.
- 4.4.3 In exceptional cases (e.g., incident response or employee offboarding), access to system credentials may be granted to authorised personnel from the IT provider with appropriate approvals and logging.

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**4.4.4** Administrative credentials must be stored securely and only accessible to authorised personnel with a copy provided to the chair of council, in a sealed envelope, only to be accessed in an emergency.

## **4.5 Password Storage and Management**

**4.5.1** Passwords must not be stored in plain text or written down in insecure locations.

**4.5.2** Passwords must be stored using a council-approved, encrypted password manager (e.g., LastPass, Bitwarden, or KeePass).

## **4.6 Password Change Requirements**

**4.6.1** The Clerk will notify you if an immediate change of password is required, if compromise is suspected.

**4.6.2** Password Access Control and Logging

**4.6.3** All access to administrative or shared credentials must be logged and auditable.

**4.6.4** Attempts to access unauthorized passwords will be treated as a security incident.

## **4.7 Responsibility**

**4.7.1** Users are responsible for creating and maintaining secure passwords for their accounts.

The IT security provider is responsible for:

**4.7.2** Managing system/service credentials.

**4.7.3** Enforcing password policies. Auditing and monitoring password-related security practices.

## **5 Monitoring**

**5.1** The council reserves the right to monitor and maintain logs of computer usage and inspect any files stored on its network, servers, computers, or associated technology to ensure compliance with this policy as well as relevant legislation. Internet, email, and computer usage is continually monitored as part of the council's protection against computer viruses, ongoing maintenance of the system, and when investigating faults.

**5.2** The council will monitor the use of electronic communications and use of the internet in line with the Investigatory Powers (Interception by Councils etc for Monitoring and Record-keeping Purposes) Regulations 2018.

**5.3** Monitoring of an employee's email and/or internet use will be conducted in accordance with an impact assessment that the council has carried out to ensure that monitoring is necessary and proportionate. Monitoring is in the council's legitimate interests and is to ensure that this policy is being complied with.

**5.4** The information obtained through monitoring may be shared internally, including with relevant councillors and IT staff if access to the data is necessary for performance of their roles. The information may also be shared with external HR or legal advisers for the purposes of seeking professional advice. Any external advisers will have appropriate data protection policies and protocols in place.

**5.5** The information gathered through monitoring will be retained only long enough for any breach of this policy to come to light and for any investigation to be conducted.

**5.6** Councillors, staff, and other authorised users have a number of rights in relation to their data, including the right to make a subject access request and the right to have data rectified or erased in some circumstances. You can find further details of these rights and how to exercise them in the council's data protection policy.

# Grimoldby and Manby Parish Council

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- 5.7 Such monitoring and the retrieval of the content of any messages may be for the purposes of checking whether the use of the system is legitimate, to find lost messages or to retrieve messages lost due to computer failure, to assist in the investigation of wrongful acts, or to comply with any legal obligation.
- 5.8 The council reserves the right to inspect all files stored on its computer systems in order to assure compliance with this policy. The council also reserves the right to monitor the types of sites being accessed and the extent and frequency of use of the internet at any time, both inside and outside of working hours to ensure that the system is not being abused and to protect the council from potential damage or disrepute.
- 5.9 Any use that the council considers to be 'improper', either in terms of the content or the amount of time spent on this, may result in disciplinary proceedings.
- 5.10 All computers will be periodically checked and scanned for unauthorised programmes and viruses.

## 6 Remote working

- 6.1 Increased IT security measures apply to those who work away from their normal place of work (e.g. whilst travelling, working from home or any other different venue etc), as follows:
- 6.1.1 if logging into the council's systems or services remotely, using computers that either do not belong to the council or are not owned by the user, any passwords must not be saved, and the user must log out at the end of the session deleting all logs and history records within the browser used. If the configuration of the device does not clearly support these actions (for example at an internet café), council services should not be accessed from that device;
  - 6.1.2 the location and direction of the screen should be checked to ensure confidential information is out of view. Steps should be taken to avoid messages being read by other people, including other travellers on public transport etc;
  - 6.1.3 any data printed should be collected and stored securely;
  - 6.1.4 all electronic files should be password protected and the data saved to the council's system/services when accessible;
  - 6.1.5 papers, files or computer equipment must not be left unattended at non council premises unless arrangements have been made with a responsible person at the non council premises for them to be kept in a locked room or cabinet if they are to be left unattended at any time;
  - 6.1.6 any data should be kept safely and should only be disposed of securely;
  - 6.1.7 papers, files, data sticks/storage, flash drive or backup hard drives should not be left unattended in cars, except where it is entirely unavoidable for short periods, in which case they must be locked in the boot of the car. If staying away overnight, council data should be taken into the accommodation, care being taken that it will not be interfered with by others or inadvertently destroyed;
  - 6.1.8 where possible the ability to remotely wipe any mobile devices that process sensitive information should be retained in the case of loss or theft;

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- 6.1.9** Councillors, staff, and other authorised users who work away from the office with sensitive data should be equipped with a screen privacy filter for mobile devices and should use this at all times when accessing such data away from the office.
- 6.1.10** Those issued with a 'dongle' to enable internet access from a laptop via 3G or 4G networks whilst away from their normal workplace should note that the cost of internet access can be very high. Dongles should therefore be used for essential council purposes only, especially if abroad.
- 6.1.11** Similarly, use of paid for Wi-Fi access, for example at airports should be carefully monitored and restricted to essential council use.

## 7 Email

- 7.1** Council email facilities are intended to promote effective and speedy communication on work-related matters. Although we encourage the use of email, it can be risky. Councillors, staff, and other authorised users need to be careful not to introduce viruses onto council systems and should take proper account of the security advice below.
- 7.2** On occasion, it will be quicker to action an issue by telephone or face to face, rather than via protracted email chains. Emails should not be used as a substitute for face to face or telephone conversations. Councillors, staff, and other authorised users are expected to decide which is the optimum channel of communication to complete their tasks quickly and effectively.
- 7.3** These rules are designed to minimise the legal risks run when using email at work and to guide councillors, staff, and other authorised users as to what may and may not be done. If there is something which is not covered in the policy, councillors, staff, and other authorised users should ask the Clerk rather than assuming they know the right answer.
- 7.4** All councillors, staff, and other authorised users who need to use email as part of their role will normally be given their own council email address and account. The council may, at any time, withdraw email access, should it feel that this is no longer necessary for the role or that the system is being abused.
- 7.5** Email messages sent on the council's account should be for council use only. Personal communications are permitted provided they do not encroach upon working time or interrupt council business in any way. Employees and other authorised users are asked to restrict their personal use to official lunch breaks or before or after working hours, and to use their personal email accounts, rather than council addresses.

## 8 Use of the Internet

### 8.1 Copyright

- 8.1.1** Much of what appears on the Internet is protected by copyright. Any copying without permission, including electronic copying, is illegal and therefore prohibited. The Copyright, Designs and Patents Act 1988 set out the rules. The copyright laws not only apply to documents but also to software. The infringement of the copyright of another person or organisation could lead to legal action being taken against the council and damages being awarded, as well as disciplinary action, including dismissal, being taken against the perpetrator.
- 8.1.2** It is easy to copy electronically, but this does not make it any less an offence. The council's policy is to comply with copyright laws, and not to bend the rules in any way.

# Grimoldby and Manby Parish Council

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- 8.1.3 Councillors, staff, and other authorised users should not assume that because a document or file is on the Internet, it can be freely copied. There is a difference between information in the ‘public domain’ (which is no longer confidential or secret information but is still copyright protected) and information which is not protected by copyright (such as where the author has been dead for more than 70 years).
- 8.1.4 Usually, a website will contain copyright conditions; these warnings should be read before downloading or copying.
- 8.1.5 Copyright and database right law can be complicated. Councillors, staff, and other authorised users should check with the Clerk if unsure about anything.

## 8.2 Trademarks, links and data protection

- 8.2.1 The council does not permit the registration of any new domain names or trademarks relating to the council’s names or products anywhere in the world, unless authorised to do so. Nor should they add links from any of the council’s web pages to any other external sites without checking first with the Council.
- 8.2.2 Special rules apply to the processing of personal and sensitive personal data. For further guidance on this, see the council’s data protection policy, a copy of which is available on the Council’s website.

## 8.3 Accuracy of information

- 8.3.1 One of the main benefits of the internet is the access it gives to large amounts of information, which is often more up to date than traditional sources such as libraries. Be aware that, as the internet is uncontrolled, much of the information may be less accurate than it appears.

## 8.4 Use of social media

- 8.4.1 Social media includes blogs; Wikipedia and other similar sites where text can be posted; multimedia or user generated media sites (YouTube); social networking sites (such as Facebook, LinkedIn, X (formerly known as Twitter), Instagram, TikTok, etc.); virtual worlds (Second Life); text messaging and mobile device communications and more traditional forms of media such as TV and newspapers. Care should be taken when using social media at any time, either using council systems or at home.
- 8.4.2 Personal use of social networking/media and chat sites should be restricted to breaks during working hours, or after hours with permission.
- 8.4.3 The council recognises the importance of councillors, staff, and other authorised users joining in and helping to shape sector conversation and enhancing its image through blogging and interaction in social media. Therefore, where it is relevant to use social networking sites as part of the individual’s position, this is acceptable.
- 8.4.4 However, inappropriate comments and postings can adversely affect the reputation of the council, even if it is not directly referenced. If comments or photographs could reasonably be interpreted as being associated with the council, or if remarks about external stakeholders could be regarded as abusive, humiliating, sexual harassment, discriminatory or derogatory, or could constitute bullying or harassment, the council will treat this as a serious disciplinary offence. Councillors, staff, and other authorised users should be aware that parishioners or other local organisations may read councillors, staff, and other authorised users’ personal weblogs, to acquire information, for example, about their work, internal council business, and employee morale. Therefore, even if the council is not named, care should be taken with any views expressed.
- 8.4.5 To protect both the council and its interests, everyone is required to comply with the following rules about social media, whether in relation to their council role or personal social networking sites, and irrespective of whether this is during or after working hours:

# Grimoldby and Manby Parish Council

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- 8.4.5.1** Any blog that mentions the council, its current work, councillors, employees, other users associated with the council, partner organisations, local groups, suppliers, parishioners, should identify the author as one of its councillors or employees and state that the views expressed on the blog or website are theirs alone and do not represent the views of Grimoldby and Manby Parish Council. Even if the council is not mentioned, care should be taken with any views expressed on social media sites and any views should clearly be stated to be the writer's own (e.g. via a disclaimer statement such as: "The comments and other content on this site are my own and do not represent the positions or opinions of my employer/ the council.") Writers must not claim or give the impression that they are speaking on behalf of the council.
- 8.4.5.2** Any employee who is developing a site or writing a blog that will mention the council, must inform the Council that they are writing this and gain agreement before going 'live'.
- 8.4.5.3** The council expects councillors, staff, and other authorised users to be respectful about the council and its current or potential staff, including employees, councillors, clerks, and authorised users and not to engage in any name calling or any behaviour that will reflect negatively on its reputation. Any unauthorised use of copyright materials, any unfounded or derogatory statements, or any misrepresentation is not viewed favourably and could constitute gross misconduct.
- 8.4.5.4** Photos or videos that include employees or other workers wearing uniforms or clothing displaying the council's name or logo should not be posted on social media if they could reflect negatively on the individual, their role, their colleagues, or the council. Additionally, photos, videos, or audio recordings must not be taken on council premises without explicit permission
- 8.4.5.5** Comments posted by councillors, staff, and other authorised users on any sites should be knowledgeable, accurate and professional and should not compromise the council in any way.
- 8.4.5.6** Inappropriate conversations with external stakeholders should not take place on any social networking sites, including forums.
- 8.4.5.7** Any writing about or displaying photos or videos of internal activities that involves current councillors, staff, and other authorised persons, might be considered a breach of data protection and a breach of privacy and confidentiality. Therefore, their permission should be gained prior to uploading any such material. Details of any kind relating to any events, conversations, materials or documents that are meant to be private, confidential or internal to the council should not be posted. This may include manuals; procedures; training documents; non-public financial or operational information; personal information regarding other councillors, staff, and other authorised users anything to do with a disciplinary case, grievance, allegation of bullying/harassment or discrimination, or legal issue; any other secret, confidential, or proprietary information or information that is subject to confidentiality agreements. This does not affect statutory requirements to publish information including under the Freedom of Information Act.
- 8.4.5.8** Councillors, staff, and other authorised users must be aware that they are personally liable for anything that they write or present online (including on an online forum or blog, post, feed or website). Councillors should always be mindful of the Members Code of Conduct and Nolan Principles. Employees may be subject to disciplinary action for comments, content, or images that are defamatory, embarrassing, pornographic, proprietary, harassing, libellous, or that can create a hostile work environment. They may also be sued by other organisations, and any individual or council that views their comments, content, or images as defamatory, pornographic, proprietary, harassing, libellous or creating a hostile work environment. In addition, other councillors, staff, and other authorised users can raise grievances for alleged bullying and/or harassment.

# Grimoldby and Manby Parish Council

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- 8.4.5.9** Postings to websites or anywhere on the internet and social media of any kind, or in any press or media of any kind, should not breach copyright or other law or disclose confidential information, defame or make derogatory comments about the council or its councillors, staff, and others, or disclose personal data or information about any individual that could breach data protection legislation.
- 8.4.5.10** Contacts by the media relating to the council, should be referred to the Clerk.
- 8.4.5.11** Councillors, staff, and other authorised users who use sites such as LinkedIn and Facebook must ensure that the information on their profile is accurate and up to date and must update their profile on leaving the council.
- 8.4.5.12** Councillors, staff, and other authorised users who use X.com, LinkedIn, or other social media/networking sites for council development purposes must ensure they provide the council with login details, including password(s), so that these sites can be accessed and updated in their absence.
- 8.4.5.13** Councillors, staff, and other authorised users who have left the council must not post any inappropriate comments about the council or its councillors, staff, and other authorised users on LinkedIn, Facebook, X.com or any other social media/networking sites.
- 8.4.5.14** During your employment/ involvement with the council, you may create or obtain access to a variety of professional contacts and confidential information. This includes, but is not limited to, contacts made through professional networking platforms such as LinkedIn, where those contacts have been established or maintained in your capacity as a councillor, member of staff, or other authorised user. All such contacts will be considered council property and may be subject to disclosure upon request.
- 8.4.6** Note that the council may, from time to time, monitor external postings on social media sites. Any employee who has a profile (for example on LinkedIn or Facebook) must not misrepresent themselves or their role with the council. Councillors, staff, and other authorised users are also advised that social media sites are not an appropriate place to air council concerns or complaints: these should be raised with the council or formally through the grievance procedure.
- 8.4.7** It is important to note that external stakeholders contact details and information remain the property of the council. In addition, councillors, staff, and other authorised users leaving the council will be required to delete all council-related data including contact details from any personal device/equipment.

## **8.5 Misuse**

Misuse of IT systems and equipment is not in line with the council's standards of conduct and will be taken seriously. Any inappropriate or unauthorised use may lead to formal action, including disciplinary proceedings or, in serious cases, dismissal.

**GRIMSHOLD AND HANNY PARISH COUNCIL**  
GENERAL DATA PROTECTION REGULATIONS (GDPR) DATA MAP

Contact Name: Lynda Phillips  
 Contact Address: 9 Alexandra Road, Louth, LN11 0ND  
 Contact Phone Number: 07827408334  
 Contact Email: [DataProtection@grimsholdhannyparishcouncil.gov.uk](mailto:DataProtection@grimsholdhannyparishcouncil.gov.uk)

Committee/Function	Purpose of Processing	Category of Personal Data	Category of Recipients (Sharing or where data flows)	Where and how is the data stored?	What security measures are in place?	Why do we need the data?	Categories of Processors (Data processors on behalf of data controller)	Names of Third Countries or International Organisations that Personal Data are Transferred to (if applicable)	Retention Schedule (Minimum Period)	Article 6 Lawful Basis of Processing Personal Data	Article 9 Conditions for Processing Special Category Data
Representation	Councillors - RO, dispensations, acceptance of office, contact details	Identity, contact information, special category data	Other local authorities, website	Hard drive, cloud, filing cabinet	Password, encryption, locked cabinet	Legal requirement	Website host, cloud storage provider, other authority	N/A	6 years	Legal obligation, consent	Substantial public interest conditions (UK GDPR Article 9(2)(g)) (See APD)
	Minutes	Identity	General Public	Hard drive, emailed to Councillors on website, cloud, filing cabinet	Password, encryption, locked cabinet	Legal requirement	Cloud storage provider, website provider, email provider	N/A	Indefinite	Legal obligation	Made public by the data subject (UK GDPR Article 9(2)(g)) or Substantial public interest conditions (UK GDPR Article 9(2)(g)) or Legal claims (UK GDPR Article 9(2)(b)) (See APD)
Finance	Invoices - sent, received, paid	Identity, contact information, bank details	Councilors, banks, internal auditor	Hard drive, cloud, email system, filing cabinet	Password, encryption, locked cabinet	Management/Financial/Sales	Cloud storage provider, email provider, accounts software	N/A	6 years	Contract, legal obligation, public task	N/A
	Cheques/Paying in Book	Identity	Banks, Councilors, Internal auditor, website	Filing cabinet, safe, hard drive, cloud, website	Password, encryption, locked cabinet	Management/Financial	Cloud storage provider, accounts software, website host	N/A	Subs: Last completed audit year, Received: 6 years	Legal obligation	N/A
Employer	Grant applications	Identity, contact information, bank details	Councilors, banks, Internal auditor	Website, filing cabinet, hard drive, cloud	Password, encryption, locked cabinet	Management/Financial	Cloud storage provider, website host, email provider	N/A	3 years	Public task, Consent	Substantial public interest conditions (UK GDPR Article 9(2)(g)) or Solicitor consent (UK GDPR Article 9(2)(b)) (See APD)
	Internet banking - councilor mandate	Identity, contact information	Banks	Hard drive, cloud, filing cabinet	Password, encryption, locked cabinet	Management/Financial	Cloud storage provider	N/A	Whilst still valid	Legal obligation	N/A
Employer	Internet banking - receiving payments	Identity, bank details	Banks, Internal auditor, website	Hard drive, cloud, website, filing cabinet	Password, encryption, locked cabinet	Management/Financial	Cloud storage provider, website host, email provider	N/A	Indefinite	Legal obligation	N/A
	Payroll and pension	Contact information, Identity (including NI), bank details	HMRC, pension provider	Hard drive, cloud, filing cabinet	Password, encryption, locked cabinet	Financial/Legal requirement	Accounts software, cloud storage provider	N/A	12 years	Contract, legal obligation	Employment, social security and social protection (UK GDPR Article 9(2)(b)) or Substantial public interest conditions (UK GDPR Article 9(2)(g)) or Health and social care (UK GDPR Article 9(2)(b)) (See APD)
Employer	Job applications	Identity, contact information, special category data	Employer	Hard drive, cloud, filing cabinet	Password, encryption, locked cabinet	Contract	Cloud storage provider, email provider	N/A	Unsuccessful - 6 months Successful - 6 years after ceasing employment	Contract, legal obligation	Employment, social security and social protection (UK GDPR Article 9(2)(b)) or Substantial public interest conditions (UK GDPR Article 9(2)(g)) or Health and social care (UK GDPR Article 9(2)(b)) (See APD)
	Staff appraisals	Identity, contact information	Employer	Hard drive, cloud, filing cabinet	Password, encryption, locked cabinet	Contract	Cloud storage provider, email provider	N/A	6 years	Contract	N/A
Employer	Employment contracts	Identity, contact information, bank details, special category data	Employer	Hard drive, cloud, filing cabinet	Password, encryption, locked cabinet	Contract	Cloud storage provider, email provider	N/A	6 years after ceasing employment	Contract, legal obligation	Employment, social security and social protection (UK GDPR Article 9(2)(b)) or Substantial public interest conditions (UK GDPR Article 9(2)(g)) or Health and social care (UK GDPR Article 9(2)(b)) (See APD)
	Emails/letters - public, organisations	Identity, contact information	Other local authorities, outside organisations (both with permission)	Hard drive, cloud, filing cabinet, email system	Password, encryption, locked cabinet	Management	Email provider	N/A	As long as necessary/until actioned	Public task	Legal claims (UK GDPR Article 9(2)(b)) or Substantial public interest (UK GDPR Article 9(2)(g)) (See APD)
Landowner	Calls - public, organisations	Identity, contact information	Other local authorities, outside organisations (both with permission)	Phone system, Hard drive, cloud, email system, filing cabinet	Password, encryption, locked cabinet	Management	Phone provider, email provider (voicemails)	N/A	As long as necessary/until actioned	Public task	Legal claims (UK GDPR Article 9(2)(b)) or Substantial public interest (UK GDPR Article 9(2)(g)) (See APD)
	Allotments (Tenancy Agreements)	Identity, contact information	Clerk	Hard drive, cloud, filing cabinet, email system	Password, encryption, locked cabinet	Management	Cloud storage provider, email provider	N/A	Only keep details of current allotment holders and keep for 6 months waiting list for 6 months	Contract	Substantial public interest (UK GDPR Article 9(2)(b)) or Employment, social security and social protection (UK GDPR Article 9(2)(b)) (See APD)
HSE	Contractors - quotes and tenders	Identity, contact information, bank details	Banks	Hard drive, cloud, filing system, email system	Password, encryption, locked cabinet	Management	Cloud storage provider, email provider	N/A	6 years	Contract	Substantial public interest (UK GDPR Article 9(2)(b)) or Employment, social security and social protection (UK GDPR Article 9(2)(b)) (See APD)
	Electoral roll	Identity, contact information	Other local authorities	Hard drive, cloud, email system	Password, encryption	Management	Cloud storage provider, email provider	N/A	1 years	Legal obligation	N/A

# Grimoldby and Manby Parish Council

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## APPROPRIATE POLICY DOCUMENT

### Introduction

Grimoldby and Manby Parish Council needs to process personal data about the customers of its facilities, its Councillors and current and former staff to carry out its functions. As part of its operations, it is also sometimes necessary for the Council to process special category data. Special category data (defined by Article 9 of the UK General Data Protection Regulation (GDPR)) and sensitive data (defined by section 35 of the Data Protection Act 2018 (DPA)) is personal data which reveals:

- racial or ethnic origin
- political opinions
- religious or philosophical beliefs
- trade union membership
- genetic data
- biometric data for the purpose of uniquely identifying a natural person
- data concerning health
- data concerning a natural person's sex life or sexual orientation

Article 10 of the UK GDPR applies to the processing of personal data relating to criminal convictions and offences or related security measures. Section 11(2) of the DPA 2018 provides that criminal offence data includes data which relates to the alleged commission of offences and related proceedings and sentencing. Information about victims and witnesses of crime is also included in the scope of data relating to criminal convictions and offences.

This policy meets the requirement in the DPA 2018 for an appropriate policy document which details the lawful basis and conditions for processing and safeguards Grimoldby and Manby Parish Council has put in place when processing special category data and criminal offence data.

### Description of Data Processed

The Grimoldby and Manby Parish Council Privacy Statement has more information about the information processed by the Council, the legal basis for processing and what the information is used for.

### Special Category Data

Grimoldby and Manby Parish Council processes special category personal data under the following legal basis:

- Article 9(2)(a) – explicit consent. An example of which would include health information we receive from employees or Councillors who require additional support.
- Article 9(2)(b) – where processing is necessary for the purposes of performing or exercising obligations or rights which are imposed or conferred by law on the Council or the data subject in connection with employment, social security, or social protection. For examples where the Council processes staff sickness and absences information.
- Article 9(2)(c) – where processing is necessary to protect vital interests. An example of this processing would be using health information about a member of staff or Councillor in a medical emergency.
- Article 9(2)(f) – for the establishment, exercise, or defence of legal claims. Examples of this processing include processing relating to any employment tribunal or other litigation.
- Article 9(2)(g) – reasons of substantial public interest. For example, to comply with other obligations imposed on the Council in its capacity as a public authority e.g., the Equality Act.
- Article 9(2)(i) – where processing is necessary for public health. For example, in relation to the Council's processing of data in response to the Covid-19 pandemic.

# Grimoldby and Manby Parish Council

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Section 10(3) of the DPA 2018 sets out that for processing of special categories of personal data and criminal offence data to be necessary for reasons of substantial public interest under Article 9(2)(g) of the UK GDPR, that processing must meet one of the conditions set out in Part 2 of Schedule 1.

The Council processes special category and criminal offence data in the performance of its statutory and corporate functions when the following conditions set out in the following paragraphs of Part 2 of Schedule 1 to the DPA 2018 are met:

- paragraph 6 Statutory etc and government purposes
- paragraph 8 Equality of opportunity or treatment
- paragraph 10 Preventing or detecting unlawful acts
- paragraph 12 Regulatory requirements relating to unlawful acts and dishonesty etc.
- paragraph 18 Safeguarding of children and individuals at risk
- paragraph 19 Safeguarding of economic well-being of certain individuals

## **Criminal Offence Data**

Grimoldby and Manby Parish Council processes criminal offence data under Article 10 of the GDPR. Examples of our processing of criminal offence data include pre-employment checks and declarations by an employee in line with contractual obligations. All processing might also be for others dependent on the context. The Council may also process special category personal data in other instances where it is not a requirement to keep an appropriate policy document. The processing of such data respects the rights and interests of the data subjects.

## **Compliance with the Data Protection Principles**

In accordance with the accountability principle, the Council maintains records of processing activities under Article 30 of the UK GDPR and section 61 of the DPA 2018. The Council will carry out data protection impact assessments (where appropriate) in accordance with Articles 35 and 36 of the UK GDPR and section 64 of the DPA 2018 to ensure data protection by design and default. The Council follows the data protection principles set out in Article 5 of the UK GDPR, and Part 3, Chapter 2 of the DPA 2018 for processing, as follows:

### **Accountability Principle**

The Council has put in place appropriate technical and organisational measures to meet the requirements of accountability. These include:

- The appointment of the Clerk as data control officer
- Taking a 'data protection by design and default' approach.
- Maintaining documentation of processing activities.
- Adopting and implementing data protection policies. Implementing contracts with data processors where appropriate.
- Implementing appropriate security measures in relation to the personal data.
- Carrying out data protection impact assessments (where required).
- Regular review of accountability measures.

### **Principle (a): Lawfulness, Fairness, and Transparency**

- The Council provides clear and transparent information about the processing of personal data including the lawful basis for that processing in the Council's Records of Processing Activities (ROPA), Privacy Statement and this policy document.

### **Principle (b): Purpose Limitation**

- The Council processes personal data for purposes of substantial public interest as explained Page 3 of 4 above when the processing is necessary to fulfil statutory and corporate functions. The Council is authorised by law to process personal data for these purposes.

# Grimoldby and Manby Parish Council

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- Where the Council shares data with another organisation, the Council shall document that sharing and implement a data sharing agreement (where required).
- The Council shall not process personal data for purposes incompatible with the original purpose it was collected for.

## **Principle (c): Data Minimisation**

- The Council shall collect personal data necessary for the relevant purposes and ensure it is not excessive. The information processed is necessary for and proportionate.
- Where personal data is provided to the Council or obtained but is not relevant to our stated purposes, it will be erased.

## **Principle (d): Accuracy**

- The Council shall ensure that where personal data is identified as inaccurate or out of date, having regard to the purpose for which it is being processed, and the Council will take every reasonable step to ensure that data is erased or rectified without delay. If the Council decides not to either erase or rectify it, for example because the lawful basis means those rights don't apply, the decision will be documented.

## **Principle (e): Storage Limitation**

- All special category data processed by the Council for the purpose of employment or substantial public interest is, unless retained longer for archiving purposes, retained for the periods set out in the Council's Retention of Documents Policy. This retention policy is reviewed regularly and updated when necessary.

## **Principle (f): Integrity and Confidentiality (Security)**

- The Council ensures that electronic information is processed within our secure networks. Hard copy information is processed in line with our security procedures. The systems used to process personal data allow data to be erased or updated as required. Electronic systems and physical storage have appropriate access controls applied.

## **Retention and Erasure Policies**

We will ensure that:

- our Data Map is kept up to date
- disposal of SC/CO information is carried out securely
- we assess the right retention period for SC/CO data by considering the following:
  - the amount, nature, and sensitivity of the personal data
  - the potential risk of harm from unauthorised use or disclosure
  - the purposes for which we process the data and it can be achieved through other means
  - any legal or regulatory requirements

## **Other Documentation**

This policy should be read in conjunction with the Council's:

- Data Protection Policy
- Retention of Documents and Records Policy
- Data Breach Guidance
- General Privacy Notice

Policies and Procedures can be viewed here:

<https://grimoldby-manby.parish.lincolnshire.gov.uk/council-business/policies-procedures>

## **Policy Review**

This policy was last approved by Grimoldby and Manby Parish Council on 18<sup>th</sup> February 2026. It is reviewed annually.

# Grimoldby and Manby Parish Council

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## INVESTMENT POLICY

This policy establishes formal objectives, practice and reporting arrangements for the effective management and control of the Council's financial management activities and associated risks

### 1) INTRODUCTION

Grimoldby and Manby Parish Council acknowledges its duty to carefully manage precept payers' money and the importance of investing any temporary surplus funds held on behalf of its community safely.

This Strategy complies with the revised requirements set out in the Department of Communities and Local Government Guidance on Local Government Investments and takes into account:

- a) Section 15 (1) (a) of the Local Government Act 2003
- b) Statutory Guidance on Local Government Investments (3rd Edition)
- c) Guidance within Governance and Accountability for Smaller Authorities Practitioner's Guide March 2025.

The Local Government Act 2003 states that a local authority may invest:

- a) For any purpose relevant to its functions under any enactment;
- b) For the purpose of prudent management of its financial affairs;

The Council defines its financial management activities as:

*“the management of the Council's cash flows, its banking and money market transactions, the effective control of the risks associated with those activities, and the pursuit of best value performance consistent with those risks.”*

### 2) INVESTMENT OBJECTIVES

The Council's investment priorities are:

- a) Security of its reserves (both general and earmarked) to ensure that money held is protected and in order to minimise loss;
- b) Adequate liquidity of its investments to ensure money is available when it is needed and not locked away for lengthy periods with or without financial penalty;
- c) Return on investment – the Council aims to obtain and achieve the best rates of interest on any investment whilst ensuring that the investment is low risk and easy to access

All investments will be made in pounds sterling (£).

The Department for Communities and Local Government maintains that the borrowing of money purely to invest or to lend and make a return is unlawful and the Council will not engage in such activity.

The Council will monitor the risk of loss on investments by review of credit ratings on a regular basis. The Council will only invest in institutions of high credit quality – based on information from credit rating agencies (e.g. Standard & Poor's, Moody's Investors Service Ltd; and Fitch Ratings Ltd).

Investments will be distributed over more than one provider or more than one portfolio (where appropriate) in order to minimise risk of financial loss.

### 3) SPECIFIED INVESTMENTS

Specified investments are those offering high security and high liquidity, made in sterling and with a maturity of no more than a year. Such short-term investments made with the UK Government or a Local Authority (as defined) or a Town/Parish Council will automatically be Specified Investments.

\* At 13<sup>th</sup> November 2025 Lloyds Bank Plc held an AA- Long Term Issuer Default Rating and an F1+ Short Term Issuer Default Rating from Fitch Ratings with a Stable Outlook.

\*\* At 1<sup>st</sup> December 2025 the amount covered by the FSCS Compensation Scheme increased to £120,000.

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The Council for the sensible effective and prudent management of its treasury balances may use:

- a) Treasury Deposits with UK clearing banks
  - b) Local Authorities or other Public Authorities
  - c) Local Authority Investment Schemes – Local Authority Investment Trust (LAMIT)
- Other approved public sector investment funds (i.e. CCLA)

The choice of institution and length of deposit will be at the approval of the full Council.

The Council will aim to achieve the optimum return on its investments commensurate with the proper levels of security and liquidity.

#### 4) NON-SPECIFIED INVESTMENTS

These investments have greater potential risk – examples include investment of funds in:

- a) The money market
- b) Stocks and shares

Given the unpredictability and uncertainty surrounding such investments, the Council will generally not use this type of investment.

Any such investment will be subject to specific consideration and approval by full Council.

#### 5) LIQUIDITY OF INVESTMENTS

The Council in consultation with the Responsible Finance Officer will determine the maximum periods for which funds may prudently be committed so as not to compromise liquidity.

Investments will be regarded as commencing on the date the commitment to invest is entered rather than the date on which the funds are paid over to the counterparty.

#### 6) LONG TERM INVESTMENTS

Long Term Investments are defined in Guidance as being greater than 36 months. Any investment greater than 36 months will be subject to specific consideration and approval by full Council.

#### 7) INVESTMENT STRATEGY 2026/27

In the year 2026/27, the Council will seek to invest in a low risk product to achieve its investment objectives.

The Council is mindful of the need to make the administration, monitoring and reporting of investments as simple as possible, especially when considering current low rates of return and administration costs associated with managing multiple accounts or creating new accounts.

The following have been identified using Fitch Ratings\* as being suitably secure in the following scenarios:

For day to day banking including current account a high degree of liquidity is required with suitable banking arrangements [easy] access for both deposit and withdrawal. This condition has limited the practical choice to [local] “High Street” banks. Grimoldby and Manby Parish Council has an ongoing long-term relationship with Lloyds Bank. The Business Current Account will continue to be held at Lloyds Bank for actual year finances. The balance not to exceed the amount covered by the Financial Services Compensation Scheme\*\* plus 20% of the annual budget for cash flow purposes. Funds to be managed so as to avoid the balance ever dropping below £66,00050,000.

A Business Deposit Account will be investigated and funds therein will not exceed £120,000 (amount covered by the Financial Services Compensation Scheme).

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The Council is aware that it will be required to incur expenditure going forwards on its assets (e.g., The Allotments, Football Field, Pavilion, Play Park and Tennis Courts). Therefore, liquidity of funds remains a higher priority than return on investment especially when the differential in rates of interest are very modest and limited.

For general investment of reserves and other funds an interest earning account that pays a competitive return is sufficient.

The Responsible Finance Officer shall have delegated authority to make all necessary transfers between the accounts from time to time to meet the annual investment strategy.

## **8) REGULAR AND END OF YEAR INVESTMENT REPORT**

Investment forecasts will be accounted for when budgets are prepared. The Responsible Finance Officer will report on investment activity (as appropriate) to the Council within budget (income /expenditure) reports.

## **9) REVIEW AND AMENDMENT OF REGULATIONS**

The Annual Investment Strategy must be reviewed annually and revised if considered necessary. The Council reserves the right to make variations to the Investment Strategy at any time subject to the approval of Council. All variations will be made available to the public.

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