

Worth Parish Council CCTV – Frequently Asked Questions (FAQs)

1. Why is Worth Parish Council installing CCTV?

The Council is introducing CCTV to enhance the safety and security of residents, visitors, and businesses in the Parish. The cameras aim to prevent and detect crime, reduce anti-social behavior, and improve public safety.

2. Where will the CCTV cameras be located?

CCTV cameras have been installed at:

- The Village Green, Copthorne
- Station Road, Crawley Down

Following a review, additional cameras may be introduced, including redeployable units that can be temporarily placed in different locations.

3. Who operates and monitors the CCTV system?

The CCTV system is owned by Worth Parish Council but is operated and monitored by Sussex Police as part of the Sussex Public Facing CCTV Partnership. CCTV footage is monitored at Sussex Police's Force Command Control and Contact Department at their Lewes headquarters.

Parish Councillors and staff do not have access to the footage.

4. Does the CCTV record 24/7?

Yes. The CCTV system operates and records 24 hours a day, 7 days a week. Footage is securely stored for 31 days before being automatically overwritten unless required for an investigation. If footage is further processed by Sussex Police, this will be retained under the Management of Police Information.

5. Can the cameras record clear images at night?

Yes. The cameras are equipped with infrared technology and built-in white lights that function like floodlights, allowing them to capture clear images even in low-light conditions. They also have built-in wipers to ensure visibility in adverse weather conditions.



6. Will the cameras be used to spy on people?

No. The CCTV system is in place for public safety and crime prevention, not for surveillance of individuals. Cameras are positioned to monitor public spaces, and privacy zones are applied to ensure that private properties are not recorded. The image here shows how this would be seen on a recording.



7. Will the CCTV cameras record audio?

No. The system does not have audio recording capabilities to ensure privacy is maintained.

8. Who can access CCTV footage?

Access to CCTV footage is strictly controlled. Only authorised Sussex Police personnel can view or retrieve recordings. Members of the public, including Councillors and Council staff, do not have access.

9. Can I request to see footage of myself?

Yes. Individuals have the right to access footage in which they appear by submitting a Subject Access Request to Sussex Police. Requests must be accompanied by proof of identity. More details on how to submit a request are available on the Council's website.

10. What if I have had personal items stolen, vandalised, or damaged? Can I access CCTV recordings?

If you have been a victim of theft, vandalism, or damage to personal property in an area covered by CCTV, you should report the incident to Sussex Police. They can review the footage as part of their investigation and determine whether it contains relevant evidence. Members of the public cannot directly access recordings but may be able to obtain information through the police.

11. Will businesses and residents be consulted before new cameras are installed?

Yes. The Council will review the effectiveness of the CCTV system and consult with the community before making any significant changes, including the addition of new cameras.

12. How can I raise a concern or complaint about the CCTV system?

Concerns or complaints can be directed to the Council's Chief Officer at:

📍 First Floor, The Parish Hub, Bowers Arms Road, Copthorne, West Sussex, RH10 3ZQ

✉ Email: clerk@worth-pc.gov.uk

The Council will investigate all complaints in line with its complaints procedure.



WORTH PARISH COUNCIL

CCTV POLICY

1. Introduction and Objectives

- 1.1 Worth Parish Council's (the Council) vision is to ensure a true 'village feel' and that Crawley Down and Copthorne are safe, attractive and enjoyable places for our existing and future residents to live. To this end, the Council is committed to ensuring the safety and security of its residents, visitors, staff and facilities.
- 1.2 Whilst new technologies provide better opportunities for the Council to prevent and detect crime and antisocial behaviour within Copthorne and Crawley Down, we realise that this must be balanced against an individual's rights of privacy.
- 1.3 This policy is therefore designed to address both the powers and obligations of the Council, and the legislation protecting the rights of individuals, in order to ensure that the Council's use of CCTV is lawful, proportionate, safe, and reasonable. It also aims to reassure individuals and the wider community that surveillance cameras are used for their safety and support, rather than for monitoring or intrusion.

2. Legal Framework

- 2.1 The CCTV system is operated in compliance with the following legislation:

- **The Data Protection Act 2018 and UK General Data Protection Regulation (GDPR):** The CCTV system will be operated in a way that ensures personal data is processed fairly, lawfully, and securely.
- **Surveillance Camera Code of Practice** (Home Office, 2013): The Council adheres to the 12 guiding principles outlined in the [Surveillance Camera Code of Practice](#) for the responsible use of CCTV, which was issued under the **Protection of Freedoms Act 2012**.
- **The Human Rights Act 1998:** The operation of CCTV must respect individuals' right to privacy under the European Convention on Human Rights.

- 2.2 The Council recognises its obligations under the above legislation and considers the use of CCTV in Worth Parish to be a necessary, proportionate and suitable tool to help prevent, detect and reduce crime; reduce the fear of crime; and improve public safety.

3. Purpose and Scope of the Policy

- 3.1 This policy outlines the operation of Worth Parish Council owned Closed-Circuit Television (CCTV) systems and has been written in accordance with the Information Commissioner's CCTV Code of Practice and the National Surveillance Commissioner's CCTV Code of Practice. It is also written in compliance with current UK legislation, as outlined above.

- 3.2 The following are covered by this policy:

- (a) **The System Owner:** *This is Worth Parish Council who are responsible for the ownership of the system with overall responsibility for ensuring this Policy is adhered to and the system is properly maintained in accordance with contractual arrangements. For this reason, Worth Parish Council are also Processors in relation to the system installation and hardware, they will not have access to the actual footage, including live streaming and retained data.*
- (b) **The Data Controller:** *Worth Parish Council are Processors in relation to the public facing CCTV system. However, under the agreement, the role of the council is limited to the responsibilities set out under 'System Owner'. Sussex Police have responsibility for operating the Council's CCTV and are responsible for how the system is used and for what purpose; this includes ensuring that operational is compliant with the Data Protection Act 2018. As required by Article 26 UK GDPR, the council and Sussex Police have agreed their respective responsibilities for compliance and it is agreed that, in addition to the operation of the cameras, Sussex Police will also manage applications from subject wishing to exercise rights under ss45-48 DPA 2018, including Subject Access Requests. Though not covered by the same legislation, Sussex Police will also manage Freedom of Information requests relating to public facing CCTV.*
- (c) **System Manager and System User:** *Members of Sussex Police staff who are trained and authorised to use surveillance equipment and have the devolved authority to manage CCTV on behalf of the Sussex Public Facing CCTV Partnership.*
- (d) **Data Subject:** *This has the same meaning as given at Article 4(1) UK GDPR and for the purposes of the CCTV partnership, relates to any individual whose personal information is captured by surveillance equipment.*

4. Purpose of CCTV Surveillance

- 4.1 The Council has installed CCTV in the Parish to enhance the safety of those who live, work, trade and visit the Parish, particularly in those areas covered by the cameras. It

will help reduce the fear of crime; assist the prevention, investigation and detection of crime; the apprehension and prosecution of offenders; the maintenance of public order and the reduction of vandalism. The cameras may also be used to support the Council's statutory obligations and duties.

4.2 The system may be used and data processed for the following purposes:

- To prevent and detect crime, providing evidential material for criminal proceedings.
- To deter and detect incidents of anti-social behaviour, providing evidential material for criminal proceedings.
- To assist with other civil proceedings such as insurance claims.
- To help locate disorientated, lost or missing persons such as those with dementia.

4.3 The systems shall not be used for any other purpose and the monitoring of the lawful movements of any individual is prohibited.

5. Scope of the CCTV

5.1 Camera surveillance is maintained using static and/or pan tilt zoom cameras at the following locations:

- The Village Green, Copthorne;
- Station Road, Crawley Down.

5.2 It is anticipated that following a period of review, a decision will be taken about whether additional cameras should be installed in the Parish. This may include the use of redeployable cameras, which can be located temporarily and transported to provide surveillance in different areas. The use of such cameras and the data produced by their use will always accord with the objectives of the CCTV System and be governed by this Policy and the Policies and Procedures of the Data Controller and Data Processor.

5.3 None of the cameras forming part of the System will be installed in a covert manner. Some may be enclosed within 'all weather domes' for aesthetic or operational reasons but the presence of all cameras will be identified by appropriate signs.

5.4 A map showing the number and location of all fixed cameras in the Parish is available on request.

6. System Operation

6.1 Cameras are positioned to monitor public areas for the purposes stated above. The System will be operated fairly, within the law, and only for the purposes for which it was established and are identified in this Policy, or which are subsequently agreed in accordance with this Policy.

6.2 The system will be operated in accordance with the Data Protection Act 2018 and all the requirements and principles of the Human Rights Act 2003 at all times.

- 6.3 The public interest in the operation of the system will be recognised by ensuring the security and integrity of operational procedures.
- 6.4 The operation of the System will also recognise the need for formal authorisation of any covert 'directed' surveillance or crime trend 'hotspot' surveillance as required by the Regulation of Investigatory Powers Act (RIPA) 2000 and Sussex Police policies and procedures.
- 6.5 The System will be operated in due deference to the general right to respect for the individual and regard for their private and family life. This means cameras will not be used to look into private residential property. Privacy zones have been put in place so that no camera will see into a resident's home and Operators will be specifically trained in privacy issues. In addition, no audio recording is enabled.
- 6.6 The System will be operated with respect for all individuals, recognising the right to be free from inhuman or degrading treatment and without any discrimination on any grounds such as sex, race, colour, sexual orientation, language, religion, political opinion, national or social origin or association with a national minority, property, birth or other status.

7. Access and Monitoring

- 7.1 It is important that access to, and disclosure of, images recorded by CCTV and similar surveillance equipment is restricted and carefully controlled, not only to ensure that the rights of individuals are preserved, but also to ensure that the chain of evidence remains intact should the images be required for evidential purposes.
- 7.2 Images are recorded through cloud-based viewing with security coded software. This is monitored and controlled by Sussex Police within the Force Command Control and Contact Department based at their Lewes headquarters.
- 7.3 Councillors and Council members of staff will NOT have access to images recorded by the system. Footage is monitored and controlled solely by named system users who are trained and authorised personnel of Sussex Police. Access is provided to limited staff only with individual login access.
- 7.4 CCTV equipment has the capability of recording all cameras simultaneously throughout every 24-hour period. CCTV Operators are able to record images from selected cameras in real-time, produce hard copies of recorded images, replay or copy any pre-recorded data at their discretion and in accordance with Sussex Police Policies and Procedures.
- 7.5 All viewing and recording equipment shall only be operated by trained and authorised users. All Operators will receive training relevant to the requirements of the Human

Rights Act 2003, Data Protection Act 2018, Regulation of Investigatory Powers Act 2000 and Sussex Police Codes of Practice and Procedures. They will be licensed by the Security Industry Authority where relevant and further training provided as necessary.

- 7.6 Unauthorised persons will not have access without an authorised member of staff being present.
- 7.7 Public access to the monitoring and recording facility will be prohibited except for lawful, proper and sufficient reasons and only then with the personal authority of the System Manager. Any such visits will be conducted and recorded in accordance with Sussex Police's Policies and Procedures.
- 7.8 Regardless of their status, all people attending Sussex Police headquarters to view cameras will be required to sign in and sign a declaration of confidentiality.
- 7.9 Requests for access to images by individuals wanting to access their personal data (Subject Access Requests) and requests by third parties will be directed to Sussex Police in accordance with their policies, procedures and legal obligations. See below for details of how to make a subject access request.

8. Data Processing and Handling of Recorded Material

- 8.1 No recorded material, whether digital, analogue, hard copy or otherwise will be released by the Data Controller unless it is in accordance with their policies, procedures and legal requirements.
- 8.2 For the purposes of this Policy, 'recorded material' means any material recorded by, or as the result of, the technical equipment which forms part of this System. This specifically includes images recorded digitally or on other media including still prints.
- 8.3 Every recording made by the use of the System has the potential for containing material that may need to be admitted in evidence at some point during the period of its retention. Members of the public must have total confidence that the information recorded will be treated with due respect for private and family life. It is therefore imperative that all recorded material is treated strictly in accordance with the Data Processor and Data Controllers Policies and Procedures in accordance with legislation until the final destruction of the material.
- 8.4 Data will be processed in accordance with the Data Protection Act 2018, summarised as:
 - All personal data will be processed fairly and lawfully.
 - Personal data will be obtained only for the purposes specified.
 - Personal data held will be accurate, relevant and not excessive in relation to the purpose for which the data is processed.
 - Steps will be taken to ensure personal data is up to date.

- Personal data will be held no longer than is necessary.
- An individual will be allowed to access their data in accordance with the relevant legislation.
- Procedures will be implemented to prevent unauthorised access to, alteration, disclosure or loss of, or destruction of information.
- Information will not be transferred outside of the European Economic area unless the rights of individuals are protected.

8.5 Access to, and the use of, recorded material will be strictly for the purposes defined in this Policy only. Recorded material will not be copied, sold or otherwise released or used for commercial purposes or for the provision of entertainment; or otherwise made available for any use incompatible with this Policy or the Policies and Procedures of Sussex Police as Data Controller.

8.6 If prints are released to the media in an effort to identify alleged offenders or potential witnesses, full details will be recorded in compliance with Sussex Police's Policies and Procedures.

8.7 The operator of the System has been notified to the Information Commissioner's Office in accordance with the current Data Protection Legislation.

9. Data Retention and Security

9.1 Recordings will be stored securely within the system for a period of up to 31 days. After that time, they will be overwritten by new recordings.

9.2 If a recording is believed to include evidence to be used in accordance with the authorised purposes of the System the recording will be extracted and saved by Sussex Police under Part 3 of the Data Protection Act 2018. The recordings will be retained, stored and securely deleted in accordance with Sussex Police's Policies and Procedures.

9.3 Every item of recorded material that is produced is managed using specific software which provides a clear audit trail.

9.4 Copyright and ownership of all material recorded on the System will remain with Sussex Police as the Data Controller.

10. Public Awareness

10.1 CCTV signs are displayed prominently in all areas covered by CCTV, informing the public of its presence and purpose. Contact information for Sussex Police is provided on the signs for individuals seeking further information or wishing to exercise their data rights.

10.2 This Policy will be available on the Council's website and in paper format upon request to the Council.

11. Requests for Information – Subject Access Request

11.1 Individuals have the right to:

- Access their personal data (Subject Access Request).
- Request rectification or erasure of data where applicable.
- Restrict or object to the processing of their data.

11.2 Any request from an individual for disclosure of personal data which they believe is recorded by virtue of the System will be directed to Sussex Police as Data Controller. This will be treated as a Data Protection Subject Access Request and is exempt from the provisions of the Freedom of Information Act.

11.3 Any person making such a request should use the Sussex Police Subject Access Request Form, [Ask for information about yourself | Sussex Police](#).

11.4 Any person making a request must be able to satisfactorily prove their identity and provide sufficient information to enable the data to be located.

11.5 If the relevant footage shows third parties and the provision of such could involve an unfair intrusion into the privacy of the third party, the footage will not be disclosed unless all third parties have provided written agreement that that the relevant footage can be obscured.

11.6 In accordance with the Data Protection Act 2018, personal data processed for the prevention of crime and/or the apprehension or prosecution of offenders is exempt from the subject access provisions to the extent to which the application of the provisions to the data would be likely to prejudice these matters.

12. Review and Audit

12.1 The CCTV System will be reviewed annually to ensure it remains necessary, proportionate and effective.

12.2 The operation of the System will also be audited on an annual basis to check for compliance with the Data Controller and Data Processors Code of Practice and Practice Manual.

12.3 This Policy will be reviewed annually by Worth Parish Council to ensure it remains compliant with legislation and continues to meet its objectives, in consultation with Sussex Police and any organisation with a participatory role in the operation of the System.

- 12.4 Sussex Police will also keep their Code of Practice and Procedural Manual under review. Any major changes (i.e. those which are likely to have a significant impact upon the Code of Practice or Procedural Manual or upon the operation of the System) will only take place after consultation with Worth Parish Council and any organisation with a participatory role in the operation of the System.
- 12.5 A minor change (i.e. such as may be required for clarification and will not have a significant impact) may be agreed between the System Manager and System Owner.

13. Complaints

- 13.1 Any concerns or complaints regarding the introduction and use of CCTV by the Council can be directed to the Council's Chief Officer at First Floor, The Parish Hub, Bowers Arms Road, Copthorne, West Sussex, RH10 3ZQ or via email to clerk@worth-pc.gov.uk.
- 13.2 Where the enquirer or complainant is a third party, and the enquiry or complaint relates to someone else, the written consent of the Data Subject is required.
- 13.3 The Council will investigate all complaints in accordance with its complaints procedure and take appropriate action if necessary.
- 13.4 All System Users are contractually subject to Regulations governing confidentiality and discipline. Any performance issues identified will be considered under the appropriate organisation's disciplinary procedures.

Adopted by Worth Parish Council on: [Date]

Review Date: [Date]

1. **Compliance with the data protection principles:** you must comply with the data protection principles listed in Article 5 of the UK GDPR. The Information Commissioner's Office guidance on the principles is [here](#). Many of the obligations have already been covered in the new arrangements as follows:
 - (a) processed lawfully, fairly and in a transparent manner in relation to individuals ('lawfulness, fairness and transparency') The template DPIA covers how this principle is being met but councils will need to:
 - ensure there are signs in place to tell the public CCTV is in operation with the signs including the purpose of CCTV and contact details and
 - ensure that CCTV is included in the council's Privacy Notice.
 - (b) collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes ('purpose limitation'). The purposes of the CCTV are to prevent and detect crime and anti-social behaviour in your council area, so you should not use the CCTV footage for any other unrelated purpose.
 - (c) adequate, relevant and limited to what is ('data minimisation'). The system already covers this because it only collects only the data which is the minimum necessary.
 - (d) accurate and, where necessary, kept up to date ('accuracy'). There are no ongoing governance tasks related to this principle.
 - (e) kept in a form which permits identification of data subjects for no longer than is necessary ('storage limitation'). The system automatically deletes information after 31 days unless it has been preserved for law enforcement or other purposes. Any footage thus preserved must not be kept any longer than is necessary.
 - (f) processed in a manner that ensures appropriate security of the personal data by implementing technical and organisational measures ('integrity and confidentiality'). The system has inbuilt security (technical) and those accessing footage should be trained in its use (organisational).
2. **Individuals' rights:** you must ensure that individuals can exercise their rights regarding their personal data, including the rights of access, rectification, erasure, restriction, data portability, objection and those related to automated decision-making. However, some of these rights are unlikely to apply to the CCTV processing.

Some local authorities are processing individuals rights internally. In other circumstances, Sussex Police will be handling compliance with individual Rights Of Access (also known as Subject Access Requests (SARs), Freedom of Information (Fol) and Rights To Be Forgotten (RTBF) in relation to the current CCTV setup on their behalf. In these scenarios, local authorities should forward the request to Sussex Police as soon as possible. Compliance with individual rights will be detailed in the ISA.

Any referral to Sussex Police for these matters should be made to:

SAR / Fol: data.protection@sussex.police.uk

RTBF: Information.Management@sussex.police.uk

3. **Security:** under UK GDPR Article 32 you must implement appropriate technical and organisational security measures to ensure the security of any personal data you hold in relation to the CCTV. The CCTV suppliers, Chroma Vision Ltd., will ensure the technical security of the system but you should train any of your staff who process CCTV images.
4. **Third party suppliers (processors):** the supplier of the system, Chroma Vision Ltd., is viewed as a processor under data protection legislation because they process the data on your behalf. Under UK GDPR Article 28 you must enter into a binding contract with your processors, which must contain a number of compulsory provisions as specified in Article 28(3). The current contract which has been set up is a compliant contract so there is no further compliance work to undertake for now.
5. **Notification of personal data breaches:** if any information which you are holding has been breached, you are responsible under UK GDPR Article 33 for deciding whether the breach is notifiable to the ICO. You are also responsible for notifying affected individuals (if the breach is likely to result in a high risk to their rights and freedoms). However, if the breach has occurred to information processed by Sussex Police for law enforcement purposes, they will be responsible for deciding whether to notify the ICO and affected data subjects.

6. **Accountability obligations:** you must comply with the UK GDPR accountability obligations:
- maintaining records including a Record of Processing Activity (ROPA) under Article 30 of UK GDPR. If you are already a data controller (e.g. you have staff or hold residents' data) you should already have a ROPA and all you will need to do is add one line entry to reflect the CCTV processing. If you do not have one, you can adopt the ICO's template ROPA [gdpr-documentation-controller-template.xlsx \(live.com\)](#).
 - carrying out a data protection impact assessment (DPIA) under UK GDPR Article 35. However, you can use the template DPIA provided by Sussex Police if you wish.
 - if you share the information with other bodies then it is good practice to have an information sharing agreement (ISA) which sets out the purpose of the sharing, cover what happens to the information at each stage, set standards and help all the parties involved in sharing to be clear about their roles and responsibilities. It also helps you to demonstrate you are meeting your accountability obligations under Article 5(2) UK GDPR (accountability). An ISA for sharing with Sussex Police has been prepared and you may sign up to that or decide to draft your own.
7. **Data protection fee:** If you are already a controller, you should have already paid a fee unless you are exempt. For more information please see the ICO guidance on [the data protection fee](#).

BETWEEN

- (1) **Sussex Police**, at Sussex Police Headquarters, Church Lane, Lewes, East Sussex BN7 2DZ (**Sussex Police**); and
- (2) **Worth Parish Council**, at First Floor, The Parish Hub, Borers Arms Road, Copthorne, West Sussex, RH10 3ZQ (**Local Authority**),

each a party and together the parties.

BACKGROUND

- (A) Sussex Police and the Local Authority entered into an Information Sharing Agreement on 01/03/2024 (**ISA**) that may require the Local Authority to process Personal Data on behalf of Sussex Police.
- (B) This Personal Data Processing Agreement (**Agreement**) sets out the additional terms, requirements and conditions on which the Local Authority will process Personal Data when providing services under the ISA. This Agreement contains the mandatory clauses required by Article 28(3) of the retained EU law version of the General Data Protection Regulation ((EU) 2016/679) for contracts between controllers and processors and the General Data Protection Regulation ((EU) 2016/679).

AGREED TERMS

1. Definitions and Interpretation

The following definitions and rules of interpretation apply in this Agreement.

1.1 Definitions:

Commissioner: the Information Commissioner (see Article 4(A3), UK GDPR and section 114, DPA 2018).

Controller, Processor, Data Subject, Personal Data, Personal Data Breach and Processing: have the meanings given to them in the Data Protection Legislation.

Controller: has the meaning given to it in section 6, DPA 2018.

Data Protection Legislation: all applicable data protection and privacy legislation in force from time to time in the UK including without limitation the UK GDPR; the Data Protection Act 2018 (and regulations made thereunder) (**DPA 2018**); and the Privacy and Electronic Communications Regulations 2003 (SI 2003/2426) as amended; and all other legislation and regulatory requirements in force from time to time which apply to a party relating to the use of Personal Data (including, without limitation, the privacy of electronic communications); and the guidance and codes of practice issued by the Commissioner or other relevant regulatory authority and which are applicable to a party.

Data Subject: the identified or identifiable living individual to whom the Personal Data relates

EEA: the European Economic Area.

Personal Data: means any information relating to an identified or identifiable living individual that is processed by the Local Authority on behalf of Sussex Police as a result of, or in connection with, the provision of the services under the ISA; an identifiable living individual is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, identification number,

location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of the individual.

Processing, processes, processed, process: any activity that involves the use of the Personal Data. It includes, but is not limited to, any operation or set of operations which is performed on the Personal Data or on sets of the Personal Data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction. Processing also includes transferring the Personal Data to third-parties.

Personal Data Breach: a breach of security leading to the accidental, unauthorised or unlawful destruction, loss, alteration, disclosure of, or access to, the Personal Data.

Processor: a natural or legal person, public authority, agency or other body which processes personal data on behalf of the Controller.

Purposes: the services to be provided by the Local Authority to Sussex Police as described in the ISA.

Records: has the meaning given to it in Clause 12.

Term: this Agreement's term as defined in Clause 10.

UK GDPR: has the meaning given to it in section 3(10) (as supplemented by section 205(4)) of the DPA 2018.

1.2 This Agreement is subject to the terms of the ISA and is incorporated into the ISA. Interpretations and defined terms set forth in the ISA apply to the interpretation of this Agreement.

1.3 A reference to writing or written includes email.

1.4 In the case of conflict or ambiguity between any of the provisions of this Agreement and the provisions of the ISA, the provisions of this Agreement will prevail.

2. Personal data types and processing purposes

2.1 Sussex Police and the Local Authority agree and acknowledge that for the purpose of the Data Protection Legislation:

- (a) Sussex Police is the Controller and the Local Authority is the Processor.
- (b) Sussex Police retains control of the Personal Data and remains responsible for its compliance obligations under the Data Protection Legislation, including but not limited to, providing any required notices and obtaining any required consents, and for the written processing instructions it gives to the Local Authority.

3. Local Authority's obligations

3.1 The Local Authority will only process the Personal Data to the extent, and in such a manner, as is necessary for the Purposes in accordance with Sussex Police's written instructions. The Local Authority will not process the Personal Data for any other purpose or in a way that does not comply with this Agreement or the Data Protection Legislation. The Local Authority must promptly notify Sussex Police if, in its opinion, Sussex Police's instructions do not comply with the Data Protection Legislation.

- 3.2 The Local Authority must comply promptly with any Sussex Police written instructions requiring the Local Authority to amend, transfer, delete or otherwise process the Personal Data, or to stop, mitigate or remedy any unauthorised processing.
- 3.3 The Local Authority will maintain the confidentiality of the Personal Data and will not disclose the Personal Data to third-parties unless Sussex Police or this Agreement specifically authorises the disclosure, or as required by domestic law, court or regulator (including the Commissioner). If a domestic law, court or regulator (including the Commissioner) requires the Local Authority to process or disclose the Personal Data to a third-party, the Local Authority must first inform Sussex Police of such legal or regulatory requirement and give Sussex Police an opportunity to object or challenge the requirement, unless the domestic law prohibits the giving of such notice.
- 3.4 The Local Authority will reasonably assist Sussex Police, at no additional cost to Sussex Police, with meeting Sussex Police compliance obligations under the Data Protection Legislation, taking into account the nature of the Local Authority's processing and the information available to the Local Authority, including in relation to Data Subject rights, data protection impact assessments and reporting to and consulting with the Commissioner under the Data Protection Legislation.
- 3.5 The Local Authority must notify Sussex Police promptly of any changes to the Data Protection Legislation that may reasonably be interpreted as adversely affecting the Local Authority's performance of the ISA or this Agreement.

4. Local Authority's employees/contractors

- 4.1 The Local Authority will ensure that its relevant employees/contractors:
- (a) are informed of the confidential nature of the Personal Data and are bound by written confidentiality obligations and use restrictions in respect of the Personal Data;
 - (b) have undertaken training on the Data Protection Legislation and how it relates to their handling of the Personal Data and how it applies to their particular duties; and
 - (c) are aware both of the Local Authority's duties and their personal duties and obligations under the Data Protection Legislation and this Agreement.

5. Security

- 5.1 The Local Authority must at all times implement appropriate technical and organisational measures against accidental, unauthorised or unlawful processing, access, copying, modification, reproduction, display or distribution of the Personal Data, and against accidental or unlawful loss, destruction, alteration, disclosure or damage of Personal Data.
- 5.2 The Local Authority must implement such measures to ensure a level of security appropriate to the risk involved, including as appropriate:
- (a) the pseudonymisation and encryption of personal data;
 - (b) the ability to ensure the ongoing confidentiality, integrity, availability and resilience of processing systems and services;
 - (c) the ability to restore the availability and access to personal data in a timely manner in the event of a physical or technical incident; and
 - (d) a process for regularly testing, assessing and evaluating the effectiveness of the security measures.

6. Personal data breach

- 6.1 The Local Authority will immediately and in any event without undue delay notify Sussex Police in writing if it becomes aware of:
- (a) the loss, unintended destruction or damage, corruption, or unusability of part or all of the Personal Data. The Local Authority will restore such Personal Data at its own expense as soon as possible.
 - (b) any accidental, unauthorised or unlawful processing of the Personal Data; or
 - (c) any Personal Data Breach.
- 6.2 Where the Local Authority becomes aware of (a), (b) and/or (c) above, it will, without undue delay, also provide Sussex Police with the following written information:
- (a) description of the nature of (a), (b) and/or (c), including the categories of in-scope Personal Data and approximate number of both Data Subjects and the Personal Data records concerned;
 - (b) the likely consequences; and
 - (c) a description of the measures taken or proposed to be taken to address (a), (b) and/or (c), including measures to mitigate its possible adverse effects.
- 6.3 Immediately following any accidental, unauthorised or unlawful Personal Data processing or Personal Data Breach, the parties will co-ordinate with each other to investigate the matter. Further, the Local Authority will reasonably co-operate with Sussex Police at no additional cost to Sussex Police, in Sussex Police's handling of the matter, including but not limited to:
- (a) assisting with any investigation;
 - (b) providing Sussex Police with physical access to any facilities and operations affected;
 - (c) facilitating interviews with the Local Authority's employees, former employees and others involved in the matter including, but not limited to, its officers and directors;
 - (d) making available all relevant records, logs, files, data reporting and other materials required to comply with all Data Protection Legislation or as otherwise reasonably required by Sussex Police; and
 - (e) taking reasonable and prompt steps to mitigate the effects and to minimise any damage resulting from the Personal Data Breach or accidental, unauthorised or unlawful Personal Data processing.
- 6.4 The Local Authority will not inform any third-party of any accidental, unauthorised or unlawful processing of all or part of the Personal Data and/or a Personal Data Breach without first obtaining Sussex Police's written consent, except when required to do so by domestic law.
- 6.5 The Local Authority agrees that Sussex Police has the sole right to determine:
- (a) whether to provide notice of the accidental, unauthorised or unlawful processing and/or the Personal Data Breach to any Data Subjects, the Commissioner, other in-scope regulators, law enforcement agencies or others, as required by law or regulation or in Sussex Police's discretion, including the contents and delivery method of the notice; and
 - (b) whether to offer any type of remedy to affected Data Subjects, including the nature and extent of such remedy.

6.6 The Local Authority will cover all reasonable expenses associated with the performance of the obligations under clause 6.1 to clause 6.3 unless the matter arose from Sussex Police's specific written instructions, negligence, wilful default or breach of this Agreement, in which case Sussex Police will cover all reasonable expenses.

6.7 The Local Authority will also reimburse Sussex Police for actual reasonable expenses that Sussex Police incurs when responding to an incident of accidental, unauthorised or unlawful processing and/or a Personal Data Breach to the extent that the Local Authority caused such, including all costs of notice and any remedy as set out in Clause 6.5.

7. Cross-border transfers of personal data

7.1 The Local Authority (and any subcontractor) must not transfer or otherwise process the Personal Data outside the UK or, the EEA without obtaining Sussex Police's prior written consent.

8. Subcontractors

8.1 The Local Authority may only authorise a third-party (subcontractor) to process the Personal Data if:

- (a) Sussex Police provides written consent prior to the appointment of each subcontractor working days after the Local Authority supplies Sussex Police with full details in writing regarding such subcontractor;
- (b) the Local Authority enters into a written contract with the subcontractor that contains terms substantially the same as those set out in this Agreement, in particular, in relation to requiring appropriate technical and organisational data security measures, and, upon Sussex Police's written request, provides Sussex Police with copies of the relevant excerpts from such contracts;
- (c) the Local Authority maintains control over all of the Personal Data it entrusts to the subcontractor; and
- (d) the subcontractor's contract terminates automatically on termination of this Agreement for any reason.

8.2 Where the subcontractor fails to fulfil its obligations under the written agreement with the Local Authority which contains terms substantially the same as those set out in this Agreement, the Local Authority remains fully liable to Sussex Police for the subcontractor's performance of its agreement obligations.

8.3 The Parties agree that the Local Authority will be deemed by them to control legally any Personal Data controlled practically by or in the possession of its subcontractors.

8.4 On Sussex Police's written request, the Local Authority will audit a subcontractor's compliance with its obligations regarding the Personal Data and provide Sussex Police with the audit results. Where Sussex Police concludes reasonably that the subcontractor is in material default of its obligations regarding the Personal Data, Sussex Police may in writing instruct the Local Authority to instruct the subcontractor to remedy such deficiencies within two days.

9. Complaints, data subject requests and third-party rights

9.1 The Local Authority must, at no additional cost to Sussex Police, take such technical and organisational measures as may be appropriate, and promptly provide such information to Sussex Police as Sussex Police may reasonably require, to enable Sussex Police to comply with:

- (a) the rights of Data Subjects under the Data Protection Legislation, including, but not limited to, subject access rights, the rights to rectify, port and erase personal data, object to the processing and automated processing of personal data, and restrict the processing of personal data; and
- (b) information or assessment notices served on Sussex Police by the Commissioner or other relevant regulator under the Data Protection Legislation.

9.2 The Local Authority must notify Sussex Police immediately in writing if it receives any complaint, notice or communication that relates directly or indirectly to the processing of the Personal Data or to either party's compliance with the Data Protection Legislation.

9.3 The Local Authority must notify Sussex Police within two days if it receives a request from a Data Subject for access to their Personal Data or to exercise any of their other rights under the Data Protection Legislation.

9.4 The Local Authority will give Sussex Police, at no additional cost to Sussex Police, its full co-operation and assistance in responding to any complaint, notice, communication or Data Subject request.

9.5 The Local Authority must not disclose the Personal Data to any Data Subject or to a third-party other than in accordance with Sussex Police's written instructions, or as required by domestic law.

10. Term and termination

10.1 This Agreement will remain in full force and effect so long as:

- (a) the ISA Agreement remains in effect; or
- (b) the Local Authority retains any of the Personal Data related to the ISA in its possession or control (**Term**).

10.2 Any provision of this Agreement that expressly or by implication should come into or continue in force on or after termination of the ISA in order to protect the Personal Data will remain in full force and effect.

10.3 The Local Authority's failure to comply with the terms of this Agreement is a material breach of the ISA. In such event, Sussex Police may terminate the ISA or any part of the ISA involving the processing of the Personal Data effective immediately on written notice to the Local Authority without further liability or obligation of Sussex Police.

10.4 If a change in any Data Protection Legislation prevents either party from fulfilling all or part of its ISA obligations, the parties may agree to suspend the processing of the Personal Data until that processing complies with the new requirements. If the parties are unable to bring the Personal Data processing into compliance with the Data Protection Legislation within 30 days, either party may terminate the ISA on not less than 30 working days.

11. Data return and destruction

11.1 At Sussex Police's request, the Local Authority will give Sussex Police, or a third-party nominated in writing by Sussex Police, a copy of or access to all or part of the Personal Data in its possession or control in the format and on the media reasonably specified by Sussex Police.

- 11.2 On termination of the ISA for any reason or expiry of its term, the Local Authority will as directed in writing by Sussex Police securely delete or destroy or return and not retain, all or any of the Personal Data related to this Agreement in its possession or control.
- 11.3 If any law, regulation, or government or regulatory body requires the Local Authority to retain any documents, materials or Personal Data that the Local Authority would otherwise be required to return or destroy, it will notify Sussex Police in writing of that retention requirement, giving details of the documents, materials or Personal Data that it must retain, the legal basis for such retention, and establishing a specific timeline for deletion or destruction once the retention requirement ends.
- 11.4 The Local Authority will certify in writing to Sussex Police that it has deleted or destroyed the Personal Data within two days after it completes the deletion or destruction.

12. Records

- 12.1 The Local Authority will keep detailed, accurate and up-to-date written records regarding any processing of the Personal Data, including but not limited to, the access, control and security of the Personal Data, approved subcontractors, the processing purposes, categories of processing, and a general description of the technical and organisational security measures referred to in Clause 5.1 (**Records**).
- 12.2 The Local Authority will ensure that the Records are sufficient to enable Sussex Police to verify the Local Authority's compliance with its obligations under this Agreement and the Data Protection Legislation and the Local Authority will provide Sussex Police with copies of the Records upon request.

13. Audit

- 13.1 The Local Authority will permit Sussex Police and its third-party representatives to audit the Local Authority's compliance with its Agreement obligations, on at least 2 days' notice, during the Term. The Local Authority will give Sussex Police and its third-party representatives all necessary assistance to conduct such audits at no additional cost to Sussex Police. The assistance may include, but is not limited to:
- (a) physical access to, remote electronic access to, and copies of the Records and any other information held at the Local Authority's premises or on systems storing the Personal Data;
 - (b) access to and meetings with any of the Local Authority's personnel reasonably necessary to provide all explanations and perform the audit effectively; and
 - (c) inspection of all Records and the infrastructure, electronic data or systems, facilities, equipment or application software used to process the Personal Data.
- 13.2 The notice requirements in Clause 13.1 will not apply if Sussex Police reasonably believes that a Personal Data Breach has occurred or is occurring, or the Local Authority is in material breach of any of its obligations under this Agreement or any of the Data Protection Legislation.
- 13.3 If a Personal Data Breach occurs or is occurring, or the Local Authority becomes aware of a breach of any of its obligations under this Agreement or any of the Data Protection Legislation, the Local Authority will:
- (a) within 24 hours of the triggering event, conduct its own audit to determine the cause
 - (b) produce a written report that includes detailed plans to remedy any deficiencies identified by the audit;

- (c) provide Sussex Police with a copy of the written audit report; and
- (d) remedy any deficiencies identified by the audit within 2 days

13.4 At Sussex Police's written request, the Local Authority will:

- (a) conduct an information security audit before it first begins processing any of the Personal Data and repeat that audit on at least an annual basis;
- (b) produce a written report that includes detailed plans to remedy any security deficiencies identified by the audit;
- (c) provide Sussex Police with a copy of the written audit report; and
- (d) remedy any deficiencies identified by the audit within 2 days

14. Warranties

14.1 The Local Authority warrants and represents that:

- (a) its employees, subcontractors, agents and any other person or persons accessing the Personal Data on its behalf are reliable and trustworthy and have received the required training on the Data Protection Legislation;
- (b) it and anyone operating on its behalf will process the Personal Data in compliance with the Data Protection Legislation and other laws, enactments, regulations, orders, standards and other similar instruments;
- (c) it has no reason to believe that the Data Protection Legislation prevents it from providing any of the ISA's services; and
- (d) considering the current technology environment and implementation costs, it will take appropriate technical and organisational measures to prevent the accidental, unauthorised or unlawful processing of Personal Data and the loss or damage to, the Personal Data, and ensure a level of security appropriate to:
 - (i) the harm that might result from such accidental, unauthorised or unlawful processing and loss or damage;
 - (ii) the nature of the Personal Data protected; and
 - (iii) comply with all applicable Data Protection Legislation and its information and security policies, including the security measures required in Clause 5.1.

14.2 Sussex Police warrants and represents that the Local Authority's expected use of the Personal Data for the Purposes and as specifically instructed by Sussex Police will comply with the Data Protection Legislation.

15. Indemnification

15.1 The Local Authority agrees to indemnify, keep indemnified and defend at its own expense Sussex Police against all costs, claims, damages or expenses incurred by Sussex Police or for which Sussex Police may become liable due to any failure by the Local Authority or its employees, subcontractors or agents to comply with any of its obligations under this Agreement and/or the Data Protection Legislation.

15.2 Any limitation of liability set forth in the ISA will not apply to this Agreement's indemnity or reimbursement obligations.

16. Notice

16.1 Any notice or other communication given to a party under or in connection with this Agreement must be in writing and delivered to:

For Sussex Police: data.protection@sussex.police.uk

For the Local Authority: clerk@worth-pc.gov.uk

This Agreement has been entered into on the date stated at the beginning of it.

Signed for and on behalf of **Sussex Police**

Authorised signature: Superintendent Jim Collen

Print Name: Jim Collen

Title: Head of Information Management / Data Protection Officer

Date: 03/05/2024

Signed for and on behalf of **Worth Parish Council**

Authorised signature:

Print Name: Leanne Banniser

Title: Chief Officer

Date: 25/03/2025



Data Protection Impact Assessment Report

Project Information	
Project Name (and or number)	CCTV Project
Information Asset Owner	Worth Parish Council
Project Manager	Gill Kearney
Information Governance Contact	Leanne Bannister, Chief Officer

Document Ownership	
Author(s)	Gill Kearney
Document Owner	Leanne Bannister

Document Review Information			
Document Location			
Quality Reviewers	Name	Role	Sections Reviewed
	Leanne Bannister	Chief Officer, WPC	Full document
	Cllrs Andrew Dymond and Alex Cruikshank	Lead Councillors for the CCTV Project	Full document
	Paul Oulsen-Jenkins	Lead for the Sussex Public Facing CCTV Partnership	Full document
	Carl Lovell	Information Governance Supervisor, Sussex Police	Full document
	James McLean	Supplier	Full document
Version History	Version Date	Requestor of Change	Summary of Change(s)
0.1	5 March 2025		Initial Draft
0.2	19 March 2025	Leanne Bannister	Amended Draft
0.3	20 March 2025	Carl Lovell, Sussex Police;	Amended Draft
0.4	20 March 2025	James McLean, Chroma Vision & Cllr Andrew Dymond	Amended Draft

Distribution List		
Name	Department/Organisation	Project Role
Carl Lovell	Sussex Police	Information Governance Supervisor advising on behalf of Sussex Police
Paul Oulsen-Jenkins	Sussex Police	Lead for the Sussex Public Facing CCTV Partnership
James McLean	Chroma Vision	Sussex Area Manager, our key

		liaison for the installation, maintenance and servicing of the CCTV system and equipment
Councillors Andrew Dymond and Alex Cruickshank	Worth Parish Council	Lead Councillors for the Project
Finance & General Purposes Committee	Worth Parish Council	Governance of the project
Full Council	Worth Parish Council	Governance of the project – to approve the CCTV Policy & FAQs, the Information Sharing Agreement with Sussex Police and this DPIA.

Introduction

The **Data Protection Impact Assessment (DPIA)** process is an important tool to help us identify and minimise the data protection risks of a project that involves processing personal data.

The DPIA process is relevant to initiatives involving the use of personal data and is particularly important when a new business process or technology initiative involves the collection, recording, sharing or retention of personal data.

The DPIA enables privacy and data protection considerations to be made in the early stages of a project where any identified problems can be easier to resolve rather than late or retrospective consideration where solutions can be more costly or delay implementation. A DPIA, can also identify whether the project should be continued when balanced with the rights and interests of persons affected.

The DPIA process will consider privacy in the way the Council use individual's personal data. This can involve privacy about: the integrity of the individual, the person, their personal information, their personal behaviour and their personal communications.

When carried out early the DPIA process can provide the following benefits:

- meet legal requirements;
- avoid loss of trust and reputation;
- identity management and privacy principles;
- avoid disproportionate or unnecessary use of personal data;
- avoid unnecessary costs;
- avoid inadequate solutions;
- support a communications strategy.

Who is responsible for carrying out a DPIA?

The Project Manager will be responsible for ensuring that the DPIA is completed. In the absence of a Project Manager it will be the relevant specified Council officer.

The DPIA will require authorisation by:

- Information Asset Owner (the Council) and Senior Responsible Officer (the Chief Officer)
- Information Governance or Data Protection Lead (the Chief Officer)
- The Chief Officer – where the DPIA has identified 'high' residual risks and referral to the Information Commissioner is required.

1. Outline of the project, objectives and benefits

This DPIA details how Worth Parish Council process data from its Public Facing CCTV (PFCCTV) systems. It details information sharing and any risks surrounding our processing under the UK GDPR (including compliance with subject rights legislation). It also outlines how the Police process data from Worth Parish Council's Public Facing CCTV (PFCCTV) systems.

Council staff and Councillors will not have access to real time or legacy footage. The Council will be entering into an Information Sharing Agreement with Sussex Police, which will provide Sussex Police with a live feed into their PFCCTV systems to allow them to fulfil their statutory responsibilities. This processing will naturally cause concern amongst the Council and Members of Public (MoP) and it is therefore necessary to detail how the Police will process personal information and how their processing is compliant with Part 3 of the Data Protection Act (DPA) 2018 for a Law Enforcement purpose.

This DPIA specifically relates to camera footage viewed and retained in relation to Part 3 of the DPA to offer reassurance that this additional processing is lawful and compliant with the necessary legislation.

Worth Parish Council will allow real time and legacy access to Police for law enforcement purposes only, this access will be controlled via a Data Controller agreement. Police access to PFCCTV will be limited to only those that need it for a valid operational policing purpose and will be supported by an auditable record. Any abuse of the system will be referred to Police Professional Standards for action.

Access will be in a control room environment with specific reviewing areas for legacy matters as is the current process. Whilst the new technology supports remote access, there is no plan to utilise this option for the foreseeable future and for the purposes of this DPIA, Police access will be restricted to a secure Control Room environment. Any changes in this process (such as the use of mobile technology) will be completed in consultation with Worth Parish Council.

Sussex Police's audit log of when CCTV was searched can be made available to the Council as and when requested as they are Data Controllers and the Council are Processors. This details live view and playback functions, and the user details associated with those actions. This can also provide the usage count should the Council wish to understand how many times the camera has been used.

Sussex Police require access to the PFCCTV to enhance the safety of those who live, work, trade and visit Sussex (particularly in the areas covered by the cameras) and as evidence to detect, investigate and prosecute crime. By allowing access to the camera live feed, the Council are supporting in the prevention, investigation and detection of crime, the apprehension and prosecution of offenders, the maintenance of public order and the reduction of vandalism. The CCTV footage may also be used to support the statutory obligations and duties of the Police / Council and to resolve complaints against Officers carrying out their duties.

The Council and Sussex Police support the individual's right of privacy and this is a paramount consideration when processing footage obtained on the PFCCTV. The community at large should be satisfied that there is responsible and accountable supervision of CCTV schemes in public places. Sussex Police will only view live footage where it is relevant, necessary and proportionate to an incident under investigation. CCTV operators will record reference numbers and reasons as to why they have viewed the footage to ensure auditable reassurance. It may be necessary to extract / retain footage for evidential purposes. This will only be done where absolutely necessary, and any retained footage will be securely stored on the Police Digital Evidence Management System (DEMS) under the relevant Management of Police Information retention period. At this stage, the Police will be the Data Controller and assume all the responsibilities associated with Subject Rights and disclosure.

The above mentioned processing will ensure PFCCTV information processed by the Police is operated fairly and within the requirements of Part 3 of the DPA 2018, the Human Rights Act 1998 and other relevant legislation.

2. Describe the intended use of personal data:

The Council is responsible for the ownership of the camera systems with overall responsibility for ensuring their CCTV Policy is adhered to and the system is properly maintained in accordance with contractual arrangements. For this reason, Worth Parish Council are Processors in relation to the system installation and hardware, however Council staff and Councillors will not have access to view either live or legacy footage, including live streaming and retained data.

An Information Sharing Agreement has been entered into with Sussex Police, which means the council is limited to the responsibilities outlined above. Sussex Police have responsibility for operating the Council's CCTV and are responsible for how the system is used and for what purpose; this includes ensuring it is operationally compliant with the Data Protection Act 2018. As required by Article 26 UK GDPR, the Council and Sussex Police have agreed their respective responsibilities for compliance and it is agreed that, in addition to the operation of the cameras, Sussex Police will also manage applications from those wishing to exercise their rights under ss45-48 DPA 2018 including Subject Access Requests. Though not covered by the same legislation, Sussex Police will also manage Freedom of Information requests relating to public facing CCTV.

To ensure transparency with MoP all cameras will be prominently situated in fixed positions, in areas to which the public have unrestricted access and within public view. No camera should be hidden or obscured and, as far as possible, all cameras should be out of risk of criminal damage.

Maximum deterrent value will be achieved by having cameras clearly visible and the areas of coverage clearly indicated by the use of street mounted signs. Signs will be deployed on the main access routes into each area covered by a CCTV scheme and also at strategic locations within the designated area. The signs will identify that the data subject is being recorded and will refer to the Sussex Police website for any further questions, such as retention, rights of access, etc. Requests in relation to data subject rights will be managed by the Sussex Police Data Protection team.

Upon receiving any Subject Access Request (SAR) / Rights Of Access (ROA) requests the Council will only be able to respond in relation to their retained data relevant to the request, however this will not include any CCTV footage. The Council will inform the requester that Sussex Police have access to the cameras and may have retained footage. Any requests relating to Police processing, retention and subject rights will be referred to data.protection@sussex.police.uk (this address can be shared with members of the public).

Sussex Police will respond, where possible, to information provided requiring police action. In criminal cases, access to recorded material must adhere fully to the Police and Criminal Evidence Act and associated Codes of Practice. All use and storage of data collected by the Police is detailed in the Force Privacy Notice (available in the [Sussex Police internet](#)).

PFCCTV data will mainly be viewed in real time to ensure effective allocation of Policing resources, however there will be occasion where Police need to retain footage for evidential purposes. This will only be the relevant, necessary and proportionate footage to ensure compliance with the data minimisation principles. Footage viewed in real time will only be held on the LA PFCCTV system for a maximum 31 days, it will not be retained in any capacity on police systems. Any evidentially required footage will be extracted to the DEMS and retained under Management of Policing Information, based on the severity and nature of the crime this will be 6, 10 or 100 years.

Sussex Police do not intend to use the PFCCTV to evidence and prosecute minor street offences unless accompanied by a more serious offence or unless it is of a nature which causes public danger or nuisance. This offers further reassurance to the Council and MoP that the access will not be used as a tool for overt mass processing of personal information.

The CCTV is watched within the Police Force by authorised personnel for the intention of catching crime in process, preventing crime about to happen and supporting prosecution of crime captured. Images of areas in which individuals would have an expectation of privacy will not be made available for these purposes nor will they be viewed by non-authorised persons. CCTV Operators are trained to recognise the privacy implications of viewing such areas and would only do so when a serious crime is being committed or they have reason to believe a serious crime is being committed.

Police may share this information with other Police Forces or agencies following a justifiable request for information. Information may be shared in the public forum or with newspapers for the purposes of apprehending criminals or concern for safety of vulnerable individuals. Where the recorded material relates to a criminal offence and publication via the Media, including television, the authority of an Acting Chief Constable (ACC) will be sought. Any further processing will be assessed and where necessary, the Council will be consulted prior to circulation.

Individuals in CCTV footage will not be identified unless for a specific policing reason. Due to this, any request for removal of data will not include CCTV footage where the individual has not been identified. The Police will only be responsible for MoP requests to view or receive a copy of extracted footage whilst it is within the 31 day retention on the Council's PFCCTV system and if it has been extracted by the Police (retained under the Management of Police Information). The viewing of retained images, when granted to members of the public, will take place in a separate and restricted room to ensure confidentiality. In criminal cases, access to recorded material must adhere fully to the Police and Criminal Evidence Act and associated Codes of Practice.

The Police CCTV operators will record all arrests and other notable incidents that have been assisted by the use of the Public CCTV System. These details will be record by appropriate predefined comment on the relevant incident serial.

Where any Council staff member becomes aware of recorded material of a potentially evidential nature, they should contact Sussex Police without delay. In the event that a Councillor first becomes aware of this, they should contact a member of the Council's staff, who will report it to Sussex Police.

Due to the nature of PFCCTV, this will include both personal and special category data (including the processing of children's data). Also, this will include high volume processing as the PFCCTV will capture MoP on a daily basis and often in highly populated areas.

Whilst Police are only concerned with viewing / retaining footage for a specific law enforcement purpose, it is evident that 'innocent' MoP will be viewed in this process. Where evidential material is retained, these MoP will also be included in the retained footage.

However, footage used for any further processing (for criminal proceedings, etc) will be redacted / edited to ensure all third parties are removed and only the person / incident of interest are visible. This ensures compliance with the protection of the rights and freedoms of others and the Human Rights Act. It is not possible to conduct these redactions at the point of retention as the requirements for evidential purposes are not clear at this stage, also not all offenders / suspects may have been identified and evidential value could be lost if removed too early.

The MoP will be aware of the capture of footage through the signage. Any further processing of this information will be identified on the Council's Privacy Notices and Police Privacy Notice. We consider this sufficient to ensure transparency of all processing of personal data. Any further questions about police processing and retention can be forwarded to the DPO@sussex.police.uk who will respond.

3. Consultation:

This document has been drawn up based upon the agreed Sussex Police Data Protection Impact Assessment Report, which was written after the following consultation approach:
All Local Authorities and the maintenance provider of equipment have been spoken to about the DPIA requirements for access and use to the PFCCTV system. This process started in August 2023 and is still

ongoing to ensure the contents of this document is fit for purpose and clear in responsibilities owned and shared.

This amended document has been shared with Sussex Police, the maintenance provider of equipment and Worth Parish Councillors to ensure it is fit for the Council's purpose and clear in responsibilities owned by the Council and shared with others.

4. Data protection compliance – assessment of necessity and proportionality of personal data processing.

Principle 1: Use of personal data is fair, lawful, and transparent:

The Council are a Joint Data Controller for the processing by the PFCCTV system and will record their lawful basis for capture and retention of PFCCTV data. The Council owns the PFCCTV system, cameras and the contract with the maintenance provider of the equipment and will process data in relation to the purchase, installation and maintenance of the contract, as well as any information from Sussex Police in relation to the PFCCTV Partnership. The Council will not have access to any of the camera's footage (live or legacy images). As such, they will not be processing any personal / special category / live time / legacy PFCCTV data.

The Police are also a Joint Data Controller and Data Processor and will process personal / special category live time / legacy PFCCTV data under their statutory functions and where processing is necessary for the performance of a law enforcement task carried out for that purpose by a competent authority under the Data Protection Act 2018 Part 3 section 35(2)(b). The definition of statutory function for 'law enforcement purposes' is 'purposes of the prevention, investigation, detection or prosecution of criminal offences or the execution of criminal penalties, including the safeguarding against and the prevention of threats to public security.

In addition, the police will process sensitive personal data under DPA2018 Section 35(5), where the processing is strictly necessary for the law enforcement purpose, and the processing meets at least one of the conditions in Schedule 8, Part 3 of the DPA 2018 and there is an appropriate policy document in place. This includes more than one condition due to the nature of policing and PFCCTV capture:

- Schedule 8(1) - Statutory purposes, necessary for the exercise of a function conferred by an enactment of law
- Schedule 8(2) - Administration of justice
- Schedule 8(3) - Protecting an individual's vital interests
- Schedule 8(4) - Safeguarding of children and of individuals at risk
- Schedule 8(8) - Preventing fraud

The third-party company providing, installing and maintaining the Council's PFCCTV equipment are also considered Data Processors under data protection legislation. As per the UK GDPR Article 28 the Council are entering into a binding contract with them, which contains a number of compulsory provisions specified in Article 28(3). Requested copy of contract to check and include anything needed here.

The right to be informed will be delivered by the Council using signage. This signage will include both Sussex Police and Worth Parish Council's logos and will refer the MoP to Sussex Police's website where it will be clear why they are processing this information. It will also highlight that Police have access to the footage for law enforcement purposes. Any further enquiries in relation to the police processing will be the Police's responsibility to respond. MoP can be given the Sussex Police DPO email address in this DPIA and their requests will be processed by the Police under Data Protection, Rights Of Access or Freedom Of Information.

Principle 2: Use of personal data is for a specified, explicit and legitimate purpose and not re-used for a purpose that is in-compatible with the original purpose:

The Information Sharing Agreement between Worth Parish Council and Sussex Police makes it clear that the Council will not have access to monitor the PFCCTV, and this is addressed in this document. From a policing perspective, any live streaming or legacy searching of the PFCCTV will only be for a specific and targeted policing purpose under Part 3 of the DPA. Any further processing will be compatible with this

purpose and where necessary, a rationale will be recorded on Niche to justify the processing. This ensures the Police and Council are compliant throughout the data lifecycle.

Principle 3: Use of personal data is adequate, relevant and no more than necessary:

Information processed by Sussex Police is limited to that which is relevant, necessary and proportionate for a law enforcement purpose, and is retained only for as long as is necessary. In this way, footage which is non-evidential will be deleted within 31 days and evidential footage will be retained in accordance with the Management of Police Information guidelines.

Principle 4: Personal data must be accurate and kept up to date:

Any live / retained footage is accurate at the time of recording. Therefore there is no requirement to edit for accuracy compliance. However, there is need to redact / amend the footage for any use in criminal proceedings. This will be done using industry suitable software and will be done in line with the specific requirements of the processing and offence recorded.

Principle 5: Personal data must be kept in an identifiable format for no longer than necessary:

The Police will not retain live stream footage, this will only be held on the Council's PFCCTV systems for up to 31 days. Any footage retained as necessary for evidential purposes will be extracted and stored in Force systems. These are secure systems that also has retention applied from Niche depending on the offence.

Principle 6: Personal data must be protected against unauthorised / unlawful use, accidental loss, damage or destruction:

As above, the data is stored on the police network on a secure system that has been assessed and approved by Information Security. Any further processing (such as evidentiary purposes) will be done using either secure links to DEMS or encrypted external drives to ensure the security of the footage.

7. Personal data will be processed in accordance with the individual's data protection rights:

The Council will refer any FOI or SAR requests in relation to any retained footage under Part 2 of the UK GDPR to Sussex Police, however as this has a 28 – 31day retention period it may not be possible to access footage after this date unless it has been retained as necessary for evidential purposes and stored in Police Force systems. At this stage, the police will manage the request for any footage they hold and either reject or provide the information as Data Controller of that information. Similarly, any submission of rights to be forgotten for police extracted data will be managed by the Sussex Police DPO.

8. Personal data will not be transferred outside the European Economic Area (EEA) without guaranteed adequate privacy protections:

Data will not be processed outside of the EEA. However, there may be occasions, due to proximity to Gatwick, to provide to other Police Forces outside of the EEA. Any processing of this nature will be fully reviewed and authorised before being shared. Redactions will also be applied to ensure on the relevant, necessary and proportionate information is shared for the data subject and no third parties.

9. Sussex Police and all Processors (Worth Council and Chroma Vision) must be able to demonstrate how they are complying with the Data Protection Act 2018 & UK GDPR:

This is identified throughout the Council's DPIA and through the Sussex Police DPIA.

5. Identifying and assessing risks

The main focus of the risk assessment within the DPIA is to consider the risks to the interests of the individuals whose data will be processed. Risks may also be intangible (significant social or economic disadvantage) such as the risk of losing public trust. The identified risks are listed below and scored using a standardised risk assessment matrix. The listed 'agreed actions' have been identified as a way to either **reduce or eliminate** risks identified as **medium or high**. Agreed measures will be factored into implementation plans and will be the responsibility of either the Assistant Clerk (Projects) or the Chief Officer to ensure they are completed.

	Describe the source of the risk, the problem it creates and the potential impact on individuals.	Likelihood of harm	Severity of harm	Risk score	Agreed action Detail to action that will reduce the risk	Action Owner	Residual Risk score
1	<i>Risk of unauthorised access to CCTV system</i>	Possible	Significant	Medium	For footage processed by police, this is protected by policies, procedures, training, access control and disciplinary measures to prevent unauthorised access. Chroma Vision will not be looking at the footage unless a fault has been raised by the owner or controllers of the CCTV system. No footage will be extracted by Chroma Vision unless there is an issue which requires their involvement to physically download from site. Anything Chroma Vision do from an engineering standpoint is logged and cannot be deleted.	Sussex Police	Low
2	Unauthorised disclosure of CCTV images	Possible	Significant	Medium	There is a controlled system for the formal disclosure of CCTV footage to the CPS, in response to SARs and to the family court. Images retained for evidential purposes are held in secure systems with access control and an audit trail to identify who has accessed and downloaded any footage.	Sussex Police	Low
3	Surveillance is	Remote	Minimal	Medium	Any public facing CCTV system will capture the	Local	Low

	disproportionate for the need and intrusively affects the privacy of members of the public.				personal data of passers-by. However, the use of the images by the police will be limited to the safeguarding of the public and the prevention, detection and investigation of crime.	Authority	
4	Personal data stored longer than is necessary or collected and stored unnecessarily by Sussex Police.	Possible	Significant	Medium	Images are only collected by the police when there is justification and a lawful reason to do so – most footage will not be collected by police. Footage which is not used for evidential purposes will be deleted promptly and any footage which is retained for evidential purposes will be kept on the force DEMS system and subject to access control and MoPI retention rules. A justification for the retention of any footage will be made and retained on the Niche system.	Sussex Police	Low

***If you have accepted any of the above risks you must provide a rationale for doing so in the 'Agreed Actions' column.**

6. Information Management – Comments / Feedback

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7. Authorisation of DPIA:

This DPIA will be retained by the Council's Chief Officer. This will be reviewed by the parties listed below with consideration then given for signatory by the Chief Officer as Senior Responsible Officer and Information Commissioners Office (ICO) if required.

	Name	Date
Information Asset Owner (The Council):	<i>The Council</i>	<i>29/09/2023</i>
Senior Responsible Officer (the Chief Officer):	<i>Leanne Bannister</i>	<i>29/09/2023</i>

Referral to the Information Commissioners Office (ICO)

Item	
Date and name of person referring DPIA to ICO:	<i>As there are no unmitigated high risks, there is no requirement to consult with the Information Commissioner's Office.</i>

Review of DPIA:

Item	Information Governance Name / role / date	Frequency	Notes



WORTH PARISH COUNCIL

GENERAL PRIVACY NOTICE

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 directly using the data itself or by combining it with other information which helps to identify a living individual (e.g. a list of staff may contain personnel ID numbers rather than names but if you use a separate list of the ID numbers which give the corresponding names to identify the staff in the first list then the first list will also be treated as 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 legislation relating to personal data and rights such as the Human Rights Act.

WHO ARE WE

This Privacy Notice is provided to you by Worth Parish Council which is the data controller for your data.

Other data controllers the council works with:

- Local authorities
- Community groups
- Charities
- Other not for profit entities
- Contractors
- Credit reference agencies
- Sussex Police

We may need to share your personal data we hold with them so that they can carry out their responsibilities to the council. If we and the other data controllers listed above are processing your data jointly for the same purposes, then the council and the other data controllers may be “joint data controllers” which mean 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 Notice.

THE COUNCIL WILL PROCESS SOME OR ALL OF THE FOLLOWING PERSONAL DATA WHERE NECESSARY TO PERFORM ITS TASKS:

- Contact details such as telephone numbers, addresses, and email addresses;
- Where they are relevant to the services provided by a council, 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 council hall or room, 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 or other special categories of personal data such as criminal convictions, racial or ethnic origin, mental and physical health, details of injuries, medication/treatment received, political beliefs, trade union affiliation, genetic data, biometric data, data concerning and sexual life or orientation.
- How we use sensitive personal data

We 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.

DO WE NEED YOUR CONSENT TO PROCESS YOUR 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.

THE COUNCIL WILL COMPLY 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;
- To confirm your identity to provide some services;
- To contact you by post, email, telephone or using social media (e.g., Facebook, Instagram, WhatsApp);
- 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 carry out comprehensive safeguarding procedures (including due diligence and complaints handling) in accordance with best 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 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.
-

WHAT IS THE LEGAL BASIS FOR PROCESSING YOUR PERSONAL DATA?

The council 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 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 hall rental facilities, 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 YOUR PERSONAL DATA

This section provides information about the third parties with whom the council 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 facilities or events for the community.

Public Facing CCTV: Worth Parish Council are installing CCTV cameras in the Parish. Worth Parish Council staff and Councillors will not be able to access CCTV footage, which means we will not view or process personal data in this regard.

The Council have entered into an Information Sharing Agreement with Sussex Police, which means that Sussex Police have primary responsibility for operating the Council's CCTV as part of the Sussex Public Facing CCTV Partnership and are responsible for how the system is used and its purpose. Sussex Police also has primary responsibility for operating the Council's CCTV in compliance with the Data Protection Act 2018. Worth Parish Council own the CCTV system and are responsible for the contract with the third-party contractor to install, service and maintain the CCTV systems on our behalf. For more information on our CCTV, please see our CCTV Policy and Frequently Asked Questions (FAQs).

HOW LONG DO WE KEEP YOUR PERSONAL DATA?

We 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 7 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. The council 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.

CCTV recordings will be stored securely for a period of up to 31 days, with automated processes built in to delete it. If a recording is believed to include evidence to be used in accordance with authorised purposes of the CCTV system, the recording will be archived by Sussex Police on a separate hard drive to be available for investigations or legal proceedings. The recordings will be retained, stored and securely deleted in accordance with Sussex Police's Policies and Procedures.

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.

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.

Freedom of Information (FOI) and Data Subject Access requests with regard to the Council's Public Facing CCTV systems, will be dealt with on our behalf by Sussex Police. Any requests sent to the Council, will be shared with Sussex Police to enable them to respond.

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.

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 for to comply with a legal obligation).

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.

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.

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 emailing us on enquiries@worth-pc.gov.uk.

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/email/> 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 also accessible from overseas so on occasion some personal data (for example in a newsletter) may be accessed from overseas].

FURTHER PROCESSING

If we wish to use your personal data for a new purpose, not covered by this Privacy Notice, then we will provide you with a new 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 NOTICE

We keep this Privacy Notice under regular review and we will place any updates on this web page www.worthparishcouncil.co.uk. This Notice was last updated in **March 2025**.

CONTACT DETAILS

Please contact us if you have any questions about this Privacy Notice or the personal data we hold about you or to exercise all relevant rights, queries or complaints at enquiries@worth-pc.gov.uk.

REVIEW OF THE POLICY

Subject to any new legislation, changes in Statute or case law which require immediate amendment; or the requirements of the Parish Council, this Policy will be reviewed within two years of adoption.

Date of Adoption: XXX

Reviewed: XXXX

Reviewed: XXXXX



WORTH PARISH COUNCIL

GENERAL PRIVACY NOTICE

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- Where they are relevant to the services provided by a council, 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 council hall or room, 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 or other special categories of personal data such as criminal convictions, racial or ethnic origin, mental and physical health, details of injuries, medication/treatment received, political beliefs, trade union affiliation, genetic data, biometric data, data concerning and sexual life or orientation.
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- information about your physical or mental health or condition in order to monitor sick leave and take decisions on your fitness for work;
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- 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.

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- To confirm your identity to provide some services;
- To contact you by post, email, telephone or using social media (e.g., Facebook, Instagram, WhatsApp);
- 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 carry out comprehensive safeguarding procedures (including due diligence and complaints handling) in accordance with best 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 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.

WHAT IS THE LEGAL BASIS FOR PROCESSING YOUR PERSONAL DATA?

The council 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 Notice sets out your rights and the council's obligations to you.

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HOW LONG DO WE KEEP YOUR PERSONAL DATA?

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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.

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.

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 for to comply with a legal obligation).

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.

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.

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 emailing us on enquiries@worth-pc.gov.uk.

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/email/> 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 also accessible from overseas so on occasion some personal data (for example in a newsletter) may be accessed from overseas].

FURTHER PROCESSING

If we wish to use your personal data for a new purpose, not covered by this Privacy Notice, then we will provide you with a new 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 NOTICE

We keep this Privacy Notice under regular review and we will place any updates on this web page www.worthparishcouncil.co.uk. This Notice was last updated in June 2018.

CONTACT DETAILS

Please contact us if you have any questions about this Privacy Notice or the personal data we hold about you or to exercise all relevant rights, queries or complaints at enquiries@worth-pc.gov.uk.

REVIEW OF THE POLICY

Subject to any new legislation, changes in Statute or case law which require immediate amendment; or the requirements of the Parish Council, this Policy will be reviewed within two years of adoption.

Date of Adoption: XXX

Reviewed: XXXX

Reviewed: XXXXX



WORTH PARISH COUNCIL

SUBJECT ACCESS REQUEST POLICY

1 SCOPE

All personal data processed by Worth Parish Council is within the scope of this procedure. This procedure excludes personal data that is asked for as a matter of routine by data subjects

Data subjects are entitled to ask:

- Whether Worth Parish Council is processing any personal data about that individual and, if so, to be given:
 - a description of the personal data;
 - the purposes for which it is being processed; and,
 - details of who will be allowed to see the personal data.
- To be given a copy of the information and to be told about the sources from which Worth Parish Council derived the information; and
- Where appropriate, logic involved in any automated decisions relating to them.

2 PROCEDURE

- 2.1 Subject Access Requests must be by email to enquiries@worth-pc.gov.uk.
- 2.2 The data subject must provide evidence as to identity.
- 2.3 The data subject must identify the data that is being requested and where it is being held, and this information must be shown in the email. Note that the data subject is entitled to ask for all data that Worth Parish Council holds, without specifying that data.
- 2.4 The date by which the identification checks, and the specification of the data sought must be recorded; Worth Parish Council has one month from this date to provide the requested information. There are no circumstances in which an extension to that one month will be provided, and failure to provide the requested information within that one month is a breach of the GDPR.
- 2.5 The SAR application is immediately forwarded to the Chief Officer, who will ensure that the requested data is collected within the time frame.

Collection will entail either:

- Collecting the data specified by the data subject; or
 - Searching all databases and all relevant filing systems (manual files) in Worth Parish Council, including all back up and archived files, whether computerised or manual, and including all e-mail folders and archives. The Parish Clerk maintains a data map that identifies where all data in Worth Parish Council is stored.
- 2.6 Worth Parish Council maintains a record of requests for data and of its receipt, including dates. Note that data may not be altered or destroyed in order to avoid disclosing it.
 - 2.7 Worth Parish Council is responsible for reviewing all provided documents to identify whether any third parties are identified in it and for either excising identifying third party information from the documentation or obtaining written consent from the third party for their identity to be revealed.
 - 2.8 If the requested data falls under one of the following exemptions, it does not have to be provided:
 - Crime prevention and detection.
 - Negotiations with the requester.

- Management forecasts.
 - Confidential references given by Worth Parish Council (not ones given to Worth Parish Council).
 - Information used for research, historical or statistical purposes.
 - Information covered by legal professional privilege.
- 2.9 The information is provided to the data subject in electronic format unless otherwise requested and all the items provided are listed on a schedule that shows the data subject's name and the date on which the information is delivered.
- 2.10 The electronic formats used for responses to SARs are:
- .CSV file

REVIEW OF THE POLICY

Subject to any new legislation, changes in Statute or case law which require immediate amendment; or the requirements of the Parish Council, this Policy will be reviewed within two years of adoption.

Date of Adoption: XXX

Reviewed: XXXX

Reviewed: XXXXX



WORTH PARISH COUNCIL

GDPR BREACH NOTIFICATION POLICY

1. SCOPE

- 1.1. This procedure applies in the event of a personal data breach under Article 33 Notification of a personal data breach to the supervisory authority, and Article 34 Communication of a personal data breach to the data subject of the GDPR.
- 1.2. The GDPR draws a distinction between a 'data controller' and a 'data processor' in order to recognise that not all organisations involved in the processing of personal data have the same degree of responsibility. Therefore, each organisation, should establish whether it is data controller, or a data processor for the same data processing activity; it must be one or the other.

2. RESPONSIBILITY

- 2.1. All users (whether Employees/Staff, contractors or temporary Employees/Staff and third-party users) and Councillors of Worth Parish Council are required to be aware of, and to follow this procedure in the event of a personal data breach.

3. PROCEDURE – BREACH NOTIFICATION DATA PROCESSOR TO DATA CONTROLLER

- 3.1. Worth Parish Council shall report any personal data breach to the data controller (Chief Officer) without undue delay.
- 3.2. The data controller records the breach in the Internal Breach Register.
- 3.3. Notification is made by email, phone call, etc.
- 3.4. Confirmation of receipt of this information is made by email

4. PROCEDURE – BREACH NOTIFICATION DATA CONTROLLER TO SUPERVISORY AUTHORITY

- 4.1. The Chief Officer shall notify the supervisory authority (ICO) without undue delay, of a personal data breach.
- 4.2. The Chief Officer assesses whether the personal data breach is likely to result in a risk to the rights and freedoms of the data subjects affected by the personal data breach.
- 4.3. If a risk to the aforementioned is likely, the Chief Officer shall report any personal data breach to the supervisory authority without undue delay, and where feasible

not later than 72 hours. Where data breach notification to the supervisory authority is not made within 72 hours, it shall be accompanied by the reasons for the delay.

4.4. The data controller shall record the following information on a Breach Notification Form:

- A description of the nature of the breach
- The categories of personal data affected
- Approximate number of data subjects affected
- Approximate number of personal data records affected
- Likely consequences of the breach
- Any measures that have been or will be taken to address the breach, including mitigation
- The information relating to the data breach, which may be provided in phases.

4.5. The Chief Officer will notify the Chairman of the Council.

4.6. Notification is made by email, phone call, etc.

4.7. Confirmation of receipt of this information is made by email.

5. PROCEDURE – BREACH NOTIFICATION DATA CONTROLLER TO DATA SUBJECT

5.1. Where the personal data breach is likely to result in high risk to the rights and freedoms of the data subject Worth Parish Council shall notify the affected data subjects without undue delay.

5.2. The notification to the data subject shall describe in clear and plain language the nature of the breach including the information specified at 4.4 above.

5.3. Appropriate measures have been taken to render the personal data unusable to any person who is not authorised to access it, such as encryption.

5.4. The controller has taken subsequent measure to ensure that the rights and freedoms of the data subjects are no longer likely to materialise.

5.5. It would require a disproportionate amount of effort. In such a scenario, there shall be a public communication or similar measure whereby the data subject is informed in an equally effective manner.

5.6. The Council may, where it considers the likelihood of a personal data breach resulting in high risk, require the data controller to communicate the personal data breach to the data subject.

REVIEW OF THE POLICY

Subject to any new legislation, changes in Statute or case law which require immediate amendment; or the requirements of the Parish Council, this Policy will be reviewed within two years of adoption.

Date of Adoption: XXX

Reviewed: XXXX

Reviewed: XXXXX

Worth Parish Council
[Crawley Down/Copthorne] Working Party

Terms of Reference

This Working Party is formed under the guidance of the Worth Parish Council Working Party General Terms of Reference, and reports to the Finance & General Purposes Committee

PURPOSE:

The Working Party will create and promote a Vision for changes to Infrastructure and Amenities in [Crawley Down/Copthorne] that can be delivered by the Parish Council to provide a better quality of life for its residents. It will ensure that local residents' aspirations are fed into the Council's Management and Committee structure for discussion and prioritisation.

MEMBERSHIP:

- The Working Party shall have membership of any ward councillors plus up to 10 co-opted or invited members consisting of:
 - Consultants/experts
 - Key Stakeholders
 - Invited members of public
- The Leader of the Working Party shall be appointed by the Working Party, **either on a rotational or annual basis.**

QUORUM:

- A quorum will be three Councillors.

MEETINGS:

- The Working Party will meet as and when ~~the Leader considers it to be necessary.~~
- Meetings shall be held in a venue in a suitable location and of a suitable size.
- Meetings are not open to the general public.
- **A Council Officer will attend each meeting, and will take the notes for that meeting OR**
- **A Council Officer will attend each meeting; it will be agreed which of its members will take the notes, these to be circulated via the office, not via the note taker.**
- ~~At each meeting, it will be agreed which of its members will take the notes; these to be circulated and agreed by its members prior to full circulation within the Council.~~
- **Whilst Working Party meetings are outside the Council's Standing Orders, professional meeting standards should be observed at all times, alcohol should not be consumed and the distinctions concerning the role of an Officer and Councillor should be maintained. No confidential matters may be discussed at such meetings due to the presence of members of the public**
- It is not a requirement that **notes or agendas** of the Working Party are on the Council's website.

ACTIVITIES:

The role of the Working Party is to provide advice, recommendations, and proposals to the Finance & General Purposes Committee in relation to the following activities. It is not a decision-making authority and has no authority **to act without authorisation nor** to spend money **nor to** incur **any** liabilities.

- To act as the Council's first point of contact for identifying ideas to improve all aspects of the village.
- To work on projects that improve the environment in the village and provide prioritised, implementable plans and budgets for such projects.
- To promote such projects in the wider community, thus providing opportunities for understanding and neighbourliness
- To review the "local" Vision document annually to ensure that the projects and initiatives arising from the Working Party are included within and consistent with Worth Parish Council's overall strategy, vision and plans.
- To encourage individuals and organisations to invest in their neighbourhoods, contributing to their development by volunteering
- To attract business support via sponsorship and other means
- Make recommendations to ensure S106 monies and other grants and funds available are obtained and directed towards projects that have maximum benefit for the village.
- Notes of meetings will be circulated to all Councillors and members when available
- ~~The Leader to give a written report of the activities and progress of the Working Party to meetings of the Finance and General Purposes Committee and~~ The Working Party will obtain authority from the Finance & General Purposes Committee prior to acting on any advice given to the parent Committee

THESE TERMS OF REFERENCE WERE ADOPTED BY WORTH PARISH COUNCIL ON:

WORTH PARISH COUNCIL

Report to Council

Title: Schedule of meetings

Meeting: Full Council

Date: 24th March 2025

Agenda Item: To consider meeting dates for the upcoming year

Background

It is now time to set dates for the coming year.

Following the Community Governance Review, it was agreed that half of Full Council meetings would be held in Crawley Down.

Some ward councillors for Crawley Down have requested that half of all meetings are held in Crawley Down.

Detail/Current Situation

Please look at the attached suggested schedule.

Please note:

- The Haven has some availability in the Birch Room on a Thursday evening, and very limited availability in the Oak Room on a Monday.
- The Glebe has some availability on a Monday.
- The available budget for meetings is £361. The meetings set out on the schedule would cost approximately £500.
- It is suggested that evenings for Council meetings is on a set evening of the week where possible. This allows consistency for the community, councillors and staff. However, you'll note that there are three Thursday evening meetings on the schedule where there was no other available meeting venue in Crawley Down available. If this is not acceptable to councillors, the meetings planned for Thursday evenings can be held in the South Room.

Summary/Proposal

It is recommended that the schedule of meetings attached is approved, and that Council keeps a record of engagement with residents to see if more residents attend meetings when they are held in the village that they live in.

Lead Officer

Leanne Bannister, Chief Officer

Worth Parish Council - Schedule of Meetings
April 2025 - March 2026

	Parish Hub	Haven	Glebe
April 2025			
Monday 7th			Planning & Highways Finance & GP
May 2025			
Monday 12th	Planning & Highways Finance & GP		
Friday 9th		Annual Parish Meeting / Parish Awards	
Monday 19th	Annual Council Meeting		
June 2025			
Monday 2nd	Planning & Highways Finance & GP		
Monday 16th	Amenties & Assets		
July 2025			
Monday 7th	Planning & Highways Finance & GP		
Monday 21st			Full Council
September 2025			
Monday 1st			Planning & Highways Finance & GP
Monday 15th	Full Council		
Monday 22nd	Amenties & Assets		
October 2025			
Thursday 2nd		Planning & Highways Finance & GP	
November 2025			
Monday 3rd	Planning & Highways Finance & GP		
Thursday 20th		Full Council	
December 2025			
Monday 1st	Planning & Highways Finance & GP		
Monday 15th			Amenties & Assets
January 2026			
Monday 12th	Planning & Highways Finance & GP		
Monday 19th	Full Council		
February 2026			
Monday 2nd	Planning & Highways Finance & GP		
March 2026			
Monday 2nd	Planning & Highways Finance & GP		
Thursday 19th		Amenties & Assets	
Monday 23rd	Full Council		

All meetings start at 7.30pm, agendas available on website at least 3 working days before the meeting

Leanne Bannister - Worth Parish Council Clerk

From: Leanne Bannister - Worth Parish Council Clerk
Sent: 10 March 2025 11:07
To: Alex Cruickshank; Andrew Dymond; Bob King; Chris Phillips; Clare Pointer; Eddie Lord; Graham Casella; Ian Gibson; Kerry Scott; Lauraine Stewart; Liz Williams; Peter Bingle; Phillip Coote; Sue Kipps; Therese Wilson; Tony Dorey; Trevor Hodsdon
Cc: Worth Parish Council Deputy Clerk; Assistant Clerk (Projects); Worth Parish Council Communications
Subject: Update from MSDC

Hi all

I attended a MSDC communications meeting on Thursday last week. Here is an update for you all.

Local Government Reorganisation (LGR)

This is an update from the perspective of MSDC's officers, and is not set in stone.

Timeline:

- January to April – Government consultation, and an interim update to the Government on how the authorities see the LGR working. No particular commitments will be made at this time.
- May to August – a decision will be made on the mayoral authority.
- September to December – the legislation for the mayoral authority will be drafted. The final proposals for the unitary structure in Sussex will be submitted.
- September 26 – December 26 – legislation for the unitary authorities is expected.
- Jan 27 – April 27 – appointment of statutory officers and the executive team.
- May 27 – elections to be held for the shadow unitary authority.
- May 27 – March 28 – operating model for the new authorities, and a constitution set.
- March 28 – MSDC dissolved.
- April 28 – new authorities are vested.

It is in MSDC's view that this process will not create any savings, and this will form part of their response to the consultation.

The MSDC Chief Executive will be speaking at the Mid Sussex Association of Local Councils conference on 20th March, and there will be a further conference in June.

MSDC does not have an official role in this process, but WSCC has been communicating well with them.

Mayoral Authority (MA) Structure

The Government wants a group of mayors that they can speak to on high level strategic matters. This will come with a 30 year investment fund for housing, local growth, adult skills and local transport. It is not expected that the MA will take on District functions, or take over the District Plan, although it is envisaged that the MA will have a high level strategic plan for the area.

- There will be one elected Mayor (which is proposed to take place in 2026)
- Up to six associate members will form the authority from the upper tier authorities

Monitoring Officer

The new Officer, Julie Galvin, is now in place.

S106 Officer

The new Officer has now started. MSDC has agreed a programme of when he will visit each parish, and he will be prioritising parishes with allocations in the District Plan. We have already made contact with him and asked for a meeting.

District Plan

No updates, nothing has been heard from the examiner.

If developers are reaching out to parishes for meetings (pre-application), MSDC are happy to be involved in those, especially if it involves a site that has not been allocated in the District Plan.

Kind regards

Leanne Bannister
Chief Officer

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RH10 3ZQ
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Instagram: [@worthparishyouth](https://www.instagram.com/worthparishyouth)

Newsletter: [Sign Up to the Worth Parish Council Newsletter](#)



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WORTH PARISH COUNCIL

Report to Council

Title: Feedback from Councillors from informal meetings

Meeting: Full Council

Date: 24th March 2025

Agenda Item: Various

Thank you all for taking the time to come and meet me. The meetings were incredibly helpful and have allowed us to gather lots of information that we can use to put plans in place to make improvements for the future.

The feedback gathered covered six broad areas:

1. Governance & Process
2. Communication
3. Project Management
4. Meetings & Collaboration
5. Forward Planning

Attached to this this report is a sheet showing all the feedback gathered, and my responses to every comment (some of the comments are duplications and have not been responded to separately).

Following these meetings, and after reviewing all the comments and speaking to the rest of the team, below are the suggested plans.

Governance & Process

The Council is formed of 17 councillors representing the two wards – Crawley Down and Copthorne. The Council manages its business using the following process:

- Full Council – to make decisions on spending over £10,000, set policy and strategy, and implement decisions recommended by committees and working parties.
- Committees – various committees with varying levels of delegated authority and spending powers, to focus on certain areas of the Council's business.
- Working Parties – the main function of these has been to gather information and allow informal conversations to enable decisions to be made by the relevant committees.
- Delegated authority – delegated to the Officers to enable business as usual activities to take place quickly and efficiently.

Village Working Parties

Most councillors report that these are now working effectively. Just as a reminder, these are not decision-making groups, so ideas and plans should be considered at the relevant committees to enable the community to have an input at an early stage, and to enable decisions to be made at the relevant committees.

Recommendation:

- These are retained.
- Cross-village issues are discussed in a forum that includes representatives from both villages at all stages.
- Non-councillor members are advertised for at least annually to show openness and willingness to work with the community.
- These will continue to be serviced by a member of staff as this allows for good communication and ensures that advice is available when needed. Members of staff will alternate where possible.
- The groundsman and Communications/IT Administrator are also keen to attend working party meetings when things relevant to their roles are discussed (subject to TOIL and availability). It is

requested that a list of discussion topics is shared with the office in advance of the meeting so that this can be arranged.

Co-ordination Group

This has met with some resistance, both recently and in the past. Like the village Working Parties, the Group does not have any decision-making powers, and is supposed to be used for high-level communication of the chairman of each committee. However, councillors would rather all councillors are members to give them an opportunity to discuss issues that effect the entire parish, and give updates on the work of the Working Parties.

Recommendation:

- The Group is renamed as the Worth Parish Council Working Party (name to be agreed by the Council – open to other suggestions).
- Terms of Reference are drafted that allow for councillors to bring forward ideas and issues that would benefit from informal discussion (for example to consider if a project is worth pursuing or is viable to pursue).
- The Group meets quarterly.
- Not every councillor is obliged to attend every meeting. Councillors can all be members, but can decide to attend when there is an issue of particular concern or aligning with their personal skills.

Task & Finish Working Parties

These can be set up as and when required to consider a specific issue. Full Council to set membership and terms of reference. These don't necessarily need to be serviced by a member of staff, unless specific advice or actions are needed.

Recommendation:

- Set up a Working Party to consider devolution, with the brief to include communicating with other local councils, MSDC/WSCC, WPC committees and staff. To keep Full Council updated with the local situation as it develops and to consider if WPC should pursue any opportunities that may arise.

Neighbourhood Plan Committee

As the villages each have separate Plans, it makes the committee difficult to administer.

Recommendation:

- Dissolve this committee.
- Day to day work to be dealt with by the village Working Parties.
- Planning & Highways Committee to have the responsibility to make decisions on the format and direction of the Plan, with Full Council retaining the responsibility to approve the final policies. Spending to be authorised by Finance & General Purpose, Full Council and using delegated authority.

Planning & Highways Committee

This committee works well, using the delegated authority effectively when required. Due to the amount and complexity of planning applications received, this committee is highly effective.

Recommendation:

- This committee is retained in its current format, however the meeting is moved to before the Planning & Highways Committee. Planning & Highways has more members of the public attend so it makes sense to keep to a set start time for them.
- As above, to add responsibility for the format and direction of the Neighbourhood Plans.

Finance & General Purpose Committee

This committee has power to authorise spending up to £10,000, although it should be noted that this authority is rarely used to that amount. For a council of this size, it is good governance to have a body that routinely verifies and checks its accounts. Keeping this function away from a Full Council meeting allows the committee to focus on the accounts in more detail.

Recommendation:

- Committee is retained and continues to meet monthly, however the meeting is moved to after the Planning & Highways Committee. Planning & Highways has more members of the public attend so it makes sense to keep to a set start time for them.

- The committee takes more time to consider forward-planning in terms of budgeting for the future, and incorporating medium to long term projects.

Amenities & Assets Committee

This committee currently meets every quarter, examining the assets of the Council. There is scope for this committee to increase its responsibility over the next few years, and could be an integral part of considering assets owned by Mid Sussex District Council that the Council may like to consider acquiring.

Recommendation:

- Committee is retained and continues to meet quarterly.
- Committee takes responsibility for the youth function as an amenity of the Council, overseeing its strategy and the implementation of it.
- More input is given to/from the groundsmen into this committee in terms of reviewing the Estate Management Plan (not day-to-day functions).

Communication

It seems that all councillors and staff are in agreement that communication across the Council needs to be improved. This will help to raise the profile of the Council, keep councillors and residents better informed, and provide more meaningful information. This can split into a few main categories:

1. Communications between staff
2. Communications between staff and councillors
3. Communications with the community

Communications between staff

We work closely as an office, updating each other following meetings. Information filters down to the youth workers via their line manager. There is a new whiteboard in the office to be used by the groundsmen so they can write up issues and we can keep on top of when these have been resolved so that nothing gets forgotten or missed. This is also used to record when residents or councillors report issues around the Parish that need to be reported to another authority.

Communications between staff and councillors

These informal meetings have been invaluable to learn about each of you, your strengths and your views. This will all help to build a more resilient council as we move into the future. It has been suggested that there is more cross-village communication, and the above recommendation to the Co-ordination Group would help here. We are already rotating staff members between the village working parties so that councillors can improve their relationship with all staff. As mentioned above the Communications & IT Administrator and Grounds Supervisor are keen to attend Working Party meetings.

Communications with the community

It is clear that there are groups in the community that neither engage with the Council nor understand its remit. It is essential that Council can reach its community so that it can gather data to inform its decisions, otherwise decision-making does not reflect the wishes of the community. Council also needs to advertise its business function (hire of the South Room) better so that it does not cost the community unnecessarily.

Some initial ideas for improvements are:

- Advertise the South Room more - at least weekly on social media, using different images and text, posters on the notice boards and direct marketing to known user groups.
- Improve our social media posts to use more images and videos, less text, and then link to the website where full details will be published.
- Do more to promote the work of the Council, in particular encouraging the community to use the Council as a first point of contact so that they can be signposted to the correct place.
- The new Youth Supervisor to make more use of images and videos to show (obviously protecting the identity of the children) what they are doing.
- Use the Parish Awards to bring the community together – fuller plan below.
- In the short term, make improvements to the website. The Communications & IT Administrator has already started this process.
- Make more use of the notice boards, publishing a list of meeting dates instead of all the agendas. Publishing engaging updates.

- Gather data from the Neighbourhood Plan surveys to ask residents what method of communication they prefer.
- Bring profiles of the councillors to social media, and ensure website presence is kept up to date.
- Councillor/staff surgeries.
- The groundsman is keen to attend working parties, and will be invited if there are matters on the agenda that relate to his role.

Recommendation:

- Implement anything that doesn't need a council decision immediately.
- Set up a Communications Working Party with a remit to build a communication strategy incorporating all the above ideas, enabling staff to use this as a guide as to how and when to communicate. Revisit the strategy regularly so that it is fluid and kept up to date.
- Use relatively inexpensive events as ways to communicate and engage with the community, such as VE Day and the Parish Awards.
- Agendas/notes for Working Party meetings are shared with the Groundsman, and we find out how often it would be suitable for him to attend (probably at the start of each season).

Representation & Engagement

The Community Governance Review is on hold until at least 2029, and this means that in the interim period the Council needs to find a way to review its systems to ensure that it is delivering fair, proportionate and meaningful services to both villages. There are many parishes throughout the country that serve multiple villages, and they have been contacted to find out if they observe similar issues and how they work to overcome them. They reported very few issues between separate villages, but explained that they work to hold meetings in both villages and use newsletters to communicate with residents. This is of course a small sample, but it is encouraging to know that there are parishes that work well with separate villages.

It is clear that the Council could be doing more to engage with the community in both villages. Here are some ideas to address that:

- Hold staff/councillor surgeries in Crawley Down regularly, so that members of the community that cannot access the Parish Hub are given the opportunity to ask questions and raise/report issues.
- Promote the Parish Hub and encourage the community to email/call/attend to meet with staff. This could also be in the form of surgeries.
- Commit to holding more meetings in Crawley Down.
- Encourage village working parties to invite councillors from the other village on occasion to learn about each village.
- More communication between the ward councillors, using a shared working party as set out above.

Recommendation:

- Agree a programme of staff/councillor surgeries, starting with quarterly to gauge interest.
- Hold more meetings in Crawley Down, but collect data on how well these are attended by residents to consider if this should continue into the following financial year.

Project Management

As staff, we get just as frustrated as councillors when projects take a long time to deliver. Issues that we encounter are:

- Waiting for third parties to do their part – this can be WSCC/MSDC or even a contractor who we have no choice but to use (e.g. for the CCTV project the Council was only able to use one contractor due to the images being monitored by Sussex Police – unfortunately they are extremely busy).
- Being a public body, there are risk and insurance implications that need to be considered. The Council is spending public money and must use process to protect that by using reputable contractors who have public liability insurance.
- Staff resourcing, although this is resolving now, councillors should be mindful that resourcing is finite and busy periods do have a knock-on effect.

Staff have taken on board the recommendations from councillors that one project should be delivered at a time, as per the agreed tracker. This will still give the Assistant Clerk (Projects) time to dip in and out of other projects, and to get involved in some business-as-usual things, but mostly her time will be devoted to progressing projects.

Councillors should be mindful that this member of staff does just work 20 hours per week, and is supported by/and supports other members of the team.

Recommendation:

- Now that the office is running with full resourcing, allow the current system to progress for 6 months to see what progress is made. If none is apparent, revisit the resourcing, structure and viability of the projects to see what needs to change.

Meetings & Collaboration

Another common theme from the feedback received is conflict at meetings resulting in the lack of effective decision making, poor appearance to the community, and a perception of pre-determination.

Councillors are reminded of the rules of debate set out in the Standing Orders, and to adhere to these. Each committee/Council chairman should ensure they are familiar with their role and powers at the meeting. Training is available for all councillors on conduct at meetings, this can be arranged on request.

WPC is not political, and councillors should be mindful that they don't use meetings to further the ideals of certain parties or to further their own political career. However, the Council is affected by the local and national political landscape, so it should welcome relevant political updates.

Staff will aid councillors in their decision making by providing clear and robust evidence for plans and ideas.

Many of you welcomed the opportunity to take part in these informal meetings, and expressed a wish to hold more of these or social events to improve the collaboration between councillors.

Recommendation:

- Councillors encouraged to attend the chairman's social event each year.
- Group training sessions are arranged on mutually agreed topics.

Forward Planning

The Council already does an element of planning for the future in terms of its project tracker, three-year financial forecast, and visioning exercise. These documents form part of the Council's strategic plan.

As a Council that could potentially change its councillors every four years, it is difficult to plan beyond that timeframe. However, a set of strategic plans that look at the short term (annual), medium term (1-3 years) and long term (4+ years) would give any potential new set of councillors a basis to work from so that they don't need to start from scratch with each new idea. It should be noted that although it is possible that a completely new set of councillors could arrive every four years, this is rarely the case.

The Council could do more to look at the future in terms of:

1. Staffing/processes – staffing has undergone a review recently, but this needs to be constantly visited to ensure that needs are being met, and to forecast how this may need to grow in the future. Processes are being built around project management.
2. Financial forecasting
3. Spatial planning including housing, boundaries and assets (this is partially covered by neighbourhood planning, and boundaries/assets may be covered by a devolution working party)

In order to inform these documents, the Council would need to collect data from its community to ensure that plans for the future correctly reflect the wishes of the community.

Recommendations:

- The Council commits to reviewing its documents regularly, updating them as fluid documents and recording progress made.
- Putting in place a system of review of the strategic plans.
- Surveying the community at least annually to inform the vision and budget process.

- Considering if this is a function of Full Council to bring this all together, or if a working party would be better to take on the bulk of the work at least in the initial period.
- Find out if there is a housing allocation for Copthorne and Crawley Down. Use this information to consider if housing should be allocated through the Neighbourhood Plan process. Consider a call for sites to find out what developers with land in the parish are likely to come forward for development in the future. This does not create a requirement to allocate sites.

Parish Awards

We suggest:

- Hire the large hall in the Haven Centre in May to hold an awards ceremony. A provisional date of Friday 9th May has been booked. This can be linked in with the Annual Meeting of the Parish to draw in more attendees.
- Councillors and the community are invited to nominate people in the community that have gone above and beyond for the Parish.
- All nominees and their families/friends are invited to attend, along with an open invitation to the community.
- Hold a closed vote (secret ballot) between councillors to decide on the winner. This will be kept a secret until the night.
- Offer a decent prize for the winner – perhaps a voucher for a meal plus a donation to a charity of their choice (ask a local business to donate this).
- Chairman to introduce each nominee and read out a short statement about why they have been nominated and invite them to the stage to receive a framed certificate.
- On the evening, offer light refreshments, such as tea and cakes.
- Invite all the main Parish voluntary associations and organisations that have been awarded grants to attend, display their information and allow them to ask for donations.
- Display information on current projects with updates (playgrounds/CCTV/Neighbourhood Plan).
- Start the event with a very short Annual Meeting of the Parish, just calling for questions from the community, then close the meeting and open the awards. Say a bit about each nominee, invite all nominees to the stage to receive a certificate and then announce the winner.
- Get a speaker or even entertainer to fill 15 minutes, then close the meeting and encourage people to walk around the displays and find out more about the local organisations, stay for tea and cake and chat with the councillors.
- Take lots of pictures and use this as a great communications exercise!

Costs are to be confirmed, but would include:

Hall hire

Frames for certificates

Prize for winner

Refreshments

This could be paid from the Chairman's allowance which has a budget of £800.

ALL FEEDBACK & RESPONSES

What obstacles do we need to address	Comments from Chief Officer
Too many projects Speed of delivery of projects	The office has taken on board comments about over-scheduling, and will only work on one major project at a time (although of course this does allow time to dip in and out of other projects). This does mean that cllrs need to be patient and accept that projects will come forward one at a time. Lead cllrs are crucial to ensure that other cllrs are updated when good progress is made. Huge progress has been made on CCTV since the projects administrator has been able to focus completely on this.
"Me too-ism" – Copthorne wants CCTV so CD must have it as well	All decisions are made by majority vote, so this a point to bring up during the viability stage of projects. I hope that projects are being decided on actual and known need. The office can help collect this data if needed.
Two villages but one Council We should stay as one Parish	Community Governance Review not happening now for at least 4 years (probably longer). Council must now find a way to make the 'two village' system work. It is not unique throughout the country, so this is not an impossible issue to solve.
Acronyms – use the full title at least once in documents/emails	This is important to note and the office will definitely take this on board. Cllrs should be mindful of this when sending emails.
Trust between councillors, and councillors/officers Rethink relations between roles of councillors and officers Some councillors don't respond to some emails	This has already started to build, and will increase with this type of work we are doing. Cllr engagement with this process has been essential. More reaching out and communication between us all - rotation of officers to attend WP meetings, informal communication encouraged. Everyone has different availability and access to email throughout the working week. Perhaps the general rule should be that if you don't respond within a week, you generally agree. This could be made easier by not asking cllrs to make any decisions by email, and keeping all communication to meetings.
Communication with residents	As addressed in the report.
Lack of support from higher up MSDC/WSCC	It is crucial that we all as a team try to build relationships with officers and cllrs at district/county level. Clerks are invited to liaison meetings with district quarterly, and are slowly building relationships.
Crawley Down schemes never happen – CCTV/Bowers Place	CCTV is progressing at the same rate in CD as it is in Cop, with the added issue of having to seek permission from WSCC. WPC is reliant on the contractor doing this application, and they are being chased frequently.
Using our voice to help people more	WPC could be an important voice to communicate HOW people can be empowered to help themselves. There is a lack of knowledge about how the Council structure works, and how residents can use their local cllrs to help them.
Working Parties are held in private and so members of the public are not involved until a late stage of decision-making	The WPs themselves can (and do) address this by inviting relevant groups/stakeholders to meetings and contacting them for views. WPs are not for decision making, and should ensure that ideas reach a committee or FC before a full plan is in place. Update ToRs to reflect this?

<p>Arguments – some councillors come with formed ideas and don't really listen</p> <p>Political issues have too much impact on decisions</p> <p>Pre-determination</p> <p>Want to be more 'business' focussed and not political</p>	<p>WPC is not political, but it is affected by politics. There is therefore a crossover when considering issues (e.g. devolution), and there can be a real benefit of working with local MPs and cllrs at District/County for the benefit of the parish. Politicians should be used to enhance the Parish, and not the other way around.</p> <p>All cllrs come with their own ideas, backgrounds and values that help them to form a decision. This is inevitable. However, cllrs should be open to listening to debate and the potential of changing their mind. A 'whip' system does not and should not exist at this level. All cllrs should respectfully listen to debate and be open to new ideas.</p>
<p>Lack of control with planning decisions</p>	<p>The Council is not a decision maker when it comes to planning decisions. The NP process is a great way to find out what new developments might be coming forward in the future, and to think about what mitigations could be put in place. Progress has already been made with meeting with developers at an early stage, and improving engagement with the community.</p>

What obstacles do we need to address	Comments from Chief Officer
<p>Unity of objectives between two villages to achieve the aims of WPC</p> <p>Too much bickering between sections of the Council</p> <p>Respect and trust</p> <p>Too much arguing, not enough courtesy</p> <p>Work together, too much arguing</p>	<p>This Council has made a pledge to Civility and Respect. All councillors and staff can help by pointing out when they feel comments and actions are disrespectful. The chairman of each Committee/Council can also help with this by moving on business and keeping control of debate.</p>
<p>More forward planning (strategic planning and disciplines)</p> <p>Financial planning – too much emphasis on increasing</p>	<p>This can be achieved through the creation (or review of existing) strategic policies, processes and plans. For example, comms strategy, 3 year budget has been started (but needs to build in more project planning), visioning has been completed but there now needs to be a process of review.</p> <p>The budget is very much in the hands of the councillors. The budget will need to increase or decrease in line with the Council's aspirations. It is worth noting that the Council has big plans but these can only be achieved with the funding in place.</p> <p>Adequate funding and staffing will very much depend on the</p>
<p>No politics</p> <p>Objective decisioning not driven by politics, personal prejudice or opinions</p>	<p>Staff can help cllrs achieve this by providing robust evidence for plans and ideas.</p>
<p>Too many meetings</p>	<p>The Council manages a lot of assets and is dealing with a lot of projects. It is unrealistic to think that one Full Council meeting a month could deal with all of these. For the sake of efficiency, committees are needed at this size of council. However, some committees could be amalgamated, e.g. Planning and NP.</p>

Planning & Highways should be moved before Finance & General Purpose as there is no certainty on timing	This is a good idea.
Finance & General Purpose Committee has become too powerful	I don't personally agree with this. The meeting is open to the public and to all councillors to attend. They can spend up to 10k. A council this size should have a committee that considers its budget and financial planning functions.
Funding of assets in Crawley Down Still a view that WPC is Copthorne centric	Plan to address this through an engagement strategy incorporating both villages. It should be noted that engagement with Copthorne is not great either, and nor is engagement with local councils throughout the country.
Nobody knows what we do and what we can't do WPC's communication is terrible WPC need to have regular events to raise profile Communications Communication with our residents Improve communication between councillors More communication about what the Council is doing and how it can help the community	All of this can be addressed through a Communication Strategy. While we wait to have this implemented, we have already improved our social media posts, and Dave is working on making small improvements to the website. Ideas: Surgeries in CD (perhaps both villages) Better use of notice boards More frequent use of social media incorporating images and videos Making cllrs (and staff?) more visible to residents Holding more low-key events (VE Day/Parish Awards) to raise the profile of the council
Project updates/returning to projects Length of time to deliver projects	This has been covered, see above.
I think we should be the Parish that wants to say 'yes' rather than 'no'	A great goal, just be mindful of what the cost of saying 'yes' is.
Relations between Council and voluntary workers	Staff to be mindful of this and ensure that processes are in place that both protect the risks of the council and aid voluntary groups for the benefit of the community
Tone of emails	Noted. Be aware that tone can be very difficult to perceive in emails, but staff and cllrs should be mindful to be professional and courteous at all times, but there are times when firm wording will be necessary.
Cohesion between villages/working together more	Suggest more cross-village working. To be addressed through whole council WP.
Recognition of staff	This is always appreciated and goes a great way to improving staff morale, which boost productivity and staff retention - a win for everyone!

What ideas do you have	Comments from Chief Officer
Groundsmen to attend more WP meetings	This is something that Shane has already suggested. How often do we want him to attend? At the start of each season?
To work together for the better good	
A separate committee to give more emphasis on allotments	Allotments are managed by the Amenities & Assets Committee. Any concerns or ideas should be discussed

	with Hannah in the first instance and then it will be taken forward at Assets & Amenities.
Chairman should alternate	This cannot be forced by policy - the Chairman is an elected position so it is very much in the control of the councillors. A majority vote stands.
Social event perhaps once a quarter where councillors get to know one another better, perhaps after a Full Council meeting More communications about what the Council is doing and how it can help the community PR guy to attend Council meeting – needs to be proactive	Chairman holds a social once a year, and we could add events in more regularly. Ideas: Training events Informal workshops Social events to be organised by cllrs Comms strategy to be implemented, but cllrs need to be aware that comms administrator works 16 hours a week and spends 5 of those doing accounts. It is not going to be possible to get him to attend meetings and respond as quickly as a PR officer. He does have lots of ideas to take forward, and these will be incorporated in a comms strategy.
More meetings to be held in Crawley Down More visibility and representation in both villages	This is being addressed.
Don't publish agendas on notice boards so there is more space for more engaging content	This can be trialled. The legislation only requires us to publish dates of meetings. If we get complaints, we will know that people want to see agendas.
Deliver one project at a time Stronger with developers	This is being addressed.
Co-Ordination Group set up could be changed to include all councillors	Recommendation to trial this. Cllrs to use it as a space to discuss cross-village issues, projects and to bring forward ideas. Amending ToRs to reflect. NO decision making power, but to be used to discuss viability of ideas and projects. No major work to be done on these ideas so that MoPs have a chance to have input at an early stage.
More working parties to deal with particular issues (such as Public Rights of Way)	This is a great way to tackle issues that require in depth research, communication with various organisations/people and medium-long term planning.
Council to start thinking about their role in local government and speaking to partners about this – set up a Working Party to deliver this	
Keep improving relationships with local voluntary groups	
More professional look at the village fayres	This should be an easy thing to fit in the budget.
Councillors to learn more about the Parish as a whole, including the villages that they don't live in	This is to be encouraged and will hopefully help to have the WP set up for all cllrs. Would cllrs be open to inviting each other to village WP meetings?

What works well

Village meetings i.e. CDWP
CDWP has become a good forum for discussion and debate

Work shop

'I think that it's working well now'

The Planning Committee process

HR management function

Keeping meetings short and focussed upon decisioning

Governance and processes

Groundsman resourcing (for now)

Lucky to have CDRA in Crawley Down

Now a full strength team of quality officers

Great events in both villages through the year

RECOMMENDATIONS – WHEN TO AGREE

Item	Recommendation	Timeline
Village Working Parties	Non-councillor members are advertised for at least annually to show openness and willingness to work with the community.	Annual Council Meeting in May, agree number of members wanted
Co-ordination Group	Renamed as the Worth Parish Council Working Party (name to be agreed by the Council – open to other suggestions).	Annual Council Meeting in May – confirm Terms of Reference and meeting schedule
Task & Finish Working Parties	Set up Local Government Review/Devolution Working Party	Annual Council Meeting in May - prepare Terms of Reference
NP Committee	Dissolve Add to Planning & Highways	Annual Council Meeting in May – confirm dissolution and amend Terms of Reference for Planning
Planning & Highways/Finance	Switch timings	24 th March when agreeing schedule of meetings
Finance	Takes more time to consider forward-planning in terms of budgeting for the future, and incorporating medium to long term projects.	Annual Council Meeting in May – amend Terms of Reference
Amenities & Assets	Takes responsibility for the youth function as an amenity of the Council, overseeing its strategy and the implementation of it. Reviewing the Estate Management Plan – to feed in from village Working Parties.	Annual Council Meeting in May – amend Terms of Reference
Communications	WPC Working Party to build draft Communications Strategy.	Annual Council Meeting in May
Representation & Engagement	Staff/councillor surgeries – office to set dates and monitor attendance	24 th March agree initial dates for Crawley Down/Copthorne
	Meetings in Crawley Down	Schedule to be agreed 24 th March
Project Management	Allow system to run for 6 months	Schedule to review in 6 months, but progress of all projects still to be monitored in the interim as it is currently

Forward Planning	Commit to reviewing documents regularly, updating them as fluid documents and recording progress made.	Office to put together schedule of all strategic documents, system of review and progress tracker. WPC Working Party to see progress initially.
	Survey community	September to agree format and questions
	Spatial planning	Ongoing through NP process
Parish Awards	Separate item/report	24 th March – Full Council to agree plan