



MINUTES OF THE MEETING OF THE **STAFFING COMMITTEE** HELD AT THE TOWN HALL ON MONDAY 10th AUGUST 2026 AT 10am

PRESENT:

David Anderson
Michael Goodwin

Trevor Bennett

Mary Evans

Also in attendance: Faye LeBon (Town Clerk) and Gavin Watson (Maintenance Manager).

It was **agreed** that Trevor Bennett would chair the meeting.

1. To Receive Apologies for Absence

Apologies were received from Catherine Fletcher, Kay Montandon and Mitchell Philpott.

2. To Receive any Declarations of Interest or Requests for Dispensation

None raised.

3. To Agree Minutes from the Meeting of 22nd July 2026

The minutes of the meeting of 22nd July 2026 were **agreed** by the committee and signed as a true and accurate record by the Chair.

4. Matters Arising from the Minutes of the Previous Meeting – For information only and not detailed on the agenda

No matters raised.

5. To Adjourn the Meeting to Allow Members of the Public and Councillors with Prejudicial Interests to Speak

No matters raised.

6. Exclusion of the Press and Public

It was **agreed** to close the meeting to the press and public under the Public Bodies (Admissions to Meetings) Act 1960, for the duration of item 7 in view of the confidential nature of the business to be transacted.

The meeting was closed to the press and public

7. To Receive Recommendations from the Interview Panel and Appoint Cleaner(s) for the Public Conveniences.

David Anderson provided a report on the interviews that took place over Friday 7th and Monday 10th August. The interview panel recommended that Suzanne Childs and Phillip Briggs be employed on a 2:5 ratio of days. In addition to this, accommodation should be made to open the public conveniences one day a week to improve the working week for the Street Cleaner. The committee **agreed** with this recommendation. The Clerk and Maintenance Manager will arrange a rota.

8. To Note Items for Information and Inclusion in a Future Agenda

It was noted that the Communications Officer was now in post.

9. To Agree Date and Time of Next Meeting as Wednesday 9th September at 11.15am at the Drill Hall

This was **agreed**.

There being no further business to conduct the meeting was closed at 10.25am

Signed _____

Date _____



A Practical Guide for CHRGS member councils



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Briefing Note

The Employment Reform landscape

The employment law landscape is undergoing significant change across 2026–27. A wide package of reforms is reshaping core employment rights, strengthening employer duties and raising expectations around fairness, documentation and decision-making. These changes expand day-one protections, tighten dismissal and leave entitlements, and increase scrutiny from regulators.

For town and parish councils, the reforms have immediate implications for governance, staffing decisions, policy updates and organisational risk. They require active compliance now, alongside preparation for further changes expected in 2027.

What this pack does

This briefing pack explains the 2026–27 employment reforms and sets out what they mean in practice for town and parish councils. It provides:

- an overview of the reforms already in force, those confirmed for 2027, and those still under consultation
- practical one-page summaries for each confirmed change, showing **what is changing** and **what the council needs to do**

The aim is to give councils a reference point that helps supports consistent, lawful and well-documented decision-making.

All CHRGS member councils will receive updated policies and templates and ongoing support to implement.

Employment Law Changes April – Dec 2026

These changes were passed by Parliament with an effective date of April 2026 and are legally binding. Compliance is a must.

Area	The Change	Implications	Check you have
Statutory Sick Pay	• SSP becomes day-one entitlement • Lower Earnings Limit removed • Waiting days abolished	• Higher SSP costs • Increased need for consistent sickness management • Payroll and policy updates required	• Adopted the updated CHRGS policy • Updated payroll processes to reflect changes. • Short welfare conversations after periods of absence and keep notes
Family Leave	• Day-one rights for Paternity Leave. • Day-one rights for Parental Leave (unpaid) • New Bereaved Partner's Leave	• Immediate eligibility • More flexibility needed for small teams • Managers need to respond promptly and sensitively to requests.	• Adopted the updated CHRGS policy • Reviewed cover arrangements within smaller teams.
Harassment Prevention Duty	• New duty to prevent sexual harassment and harassment by third-parties • Stronger whistleblowing protections	• Higher expectations on culture and reporting routes • Councillors and managers must model respectful behaviour	• Adopted the updated CHRGS policies • Reviewed reporting routes to consider confidentiality • Reviewed third-party contracts to include appropriate clauses

Employment Law Changes April – Dec 2026

These changes were passed by Parliament with an effective date of April 2026 and are legally binding. Compliance is a must.

Area	The Change	Implications	Check you have
Holiday Pay & Records	Six-year holiday pay requirement	- Increased admin burden - Need for consistent, auditable systems - Greater scrutiny from new regulator	- Simple, consistent records of leave and absence - Checked holiday balances are being recorded correctly - Updated payroll processes
Tribunals	- Time to bring an employment tribunal claim increasing from 3 to 6 months - Applies where the infringement occurs on or after 1 October 2026. Draft regulations extend the six-month limit to claims involving: - Part-time workers' rights - Fixed-term employees' rights - Information and consultation rights - Blacklisting - Zero-hours exclusivity protections - NHS recruitment whistleblowing protections A separate draft order also extends the six-month limit for breach of contract claims heard in tribunals	- Staff will have longer to bring claims - Greater admin and governance requirements - Previous issues may be brought forward	- Good record-keeping — keep notes, minutes, decisions and correspondence for longer - Document informal issues (within data protection guidance) - Ensure consistent processes across all staff - Review historic grievance and disciplinary matters to identify any areas of risk - Review performance management process

Future Changes with a go-live date in 2027

These reforms are confirmed. CHRGS will issue updated policies - please refer to the one-page action checklists later in this pack .

Area	Proposed Change	Implications
Unfair Dismissal Qualifying Period	- Qualifying period reduced, meaning from 1 July 2026, employees only need 6 months qualifying service. - Anyone employed after 1 Jan 2025 and up to 1 July 2026 can bring a claim earlier. - Compensation cap being removed.	Earlier protection requires stronger probation processes that include early conversations and keeping notes.
Flexible Working	- Day one rights to request flexible working will be strengthened - Employers must justify refusals and explain why they are reasonable (2027).	- Need for a clear decision-making framework that covers the business reasons for processing requests - Reviewing what forms of flexible working may be suitable for the council - Requirement to meet the employee before any refusal.
Pregnancy & Maternity Dismissal Protection	Unlawful to dismiss during pregnancy, maternity leave, and 6 months after return.	- Higher dismissal risk. - Need for early conversations when issues arise - Need for support and induction on return from leave.
Bereavement Leave	- Introduction of one week of bereavement leave for wider family members. - One week of leave for pregnancy loss before 24 weeks (2027).	- Wider eligibility. - Sensitive conversations and information management

Future Reforms – Not Yet Confirmed/Need Consultation

These areas are subject to consultation and may change before any legislation is introduced. No formal outcome dates have been set for these reforms.

Area	What's Happening	Status	Preparation
Zero hours, low-hours workers and agency workers	Updating rights so that those on zero hours/low hours or agency workers are “guaranteed hours” with hours being calculated using a reference period of 12 weeks.	Active consultation	- Identify how many individuals are on variable or casual hours - Review how hours worked are monitored and recorded
TUPE Reform	Simplification for small transfers.	Call for evidence	- Seek CHRGS HR/legal advice early if you transfer services.
Carer's Leave Review	A review of the current unpaid right to carers leave (2024) which will consider paid leave and extended unpaid leave.	Review underway; consultation expected late 2026.	- Be aware this may expand - CHRGS will provide updated policy - Continue supportive conversations with any employee who has caring responsibilities

Other employment reforms are being discussed by Government, but no draft legislation, consultation or implementation timetable has been published. These include proposals on;

- extended equal pay rights, single worker status and employment tribunal reform.

CHRGS will update members when consultations conclude. No action should be taken until CHRGS issues updated guidance

Preparing for further 2026/27 changes

A close-up photograph of a blue ballpoint pen writing blue checkmarks on a white document. The pen is positioned diagonally from the top right towards the bottom left. Several checkmarks are visible, some already drawn and others in the process of being drawn. The background is slightly blurred, showing more of the document and the pen's tip.

The following one-page guides show the key changes and the actions needed.

Across all 2027 changes, councils should focus on:

- ✓ **Early, supportive conversations with employees**
- ✓ **Clear, simple notes of discussions and decisions**
- ✓ **Using CHRGs templates and updated policies**
- ✓ **Raising concerns early rather than waiting**

Unfair Dismissal Qualifying Period – 1 January 2027



What is changing (from 1 January 2027)

The qualifying period for ordinary unfair dismissal will reduce from two year to six months. Probation is no longer a safety net – conversations and documentation matters.

This change applies to any employee who reaches six months' service on or after 1 January 2027. In practice, this includes anyone employed from July 2026 onwards.

After six months' service, an employee will gain the right to claim unfair dismissal unless the council can show:

- a **fair reason** (conduct, capability, redundancy, statutory restriction, or “some other substantial reason”), and
- a **fair process** was followed.

What the Council needs to do

- ☐ Adopt the updated CHRGS policies and forms.
- ☐ Ensure you have a clear induction process in place.
- ☐ Amend probation duration to 3 months with regular, formal reviews and notes (this allows for extensions within the qualifying period).
- ☐ Raise concerns when they arise; do not leave them for the end of probation.
- ☐ Hold final probation review meeting and confirm outcome in writing.
- ☐ Ensure managers, councillors & staffing committees understand the new threshold and process

Additionally:

- ☐ Review the performance of anyone hired after 1 Jan 2025
- ☐ Check if any employees are still in probation.
- ☐ Have clear agreed actions for any areas of concern.



What is changing (from Oct 2026)

Employers now have a legal duty to take **all** reasonable steps to prevent all forms of harassment, including harassment by third parties (contractors, suppliers, members of the public).

- Stronger whistleblowing protections apply.
- Councils must be able to show they have taken proportionate, practical action to create a safe working environment.
- The duty applies to all councils, regardless of size.

What the Council needs to do

- ☐ Adopt the updated CHRGS policies
- ☐ Ensure councillors/managers model respectful behaviour
- ☐ Provide clear, confidential reporting routes for staff to raise concerns
- ☐ Ensure staff and councillors understand what harassment is and how to report it
- ☐ Review lone-working or public-facing roles to ensure risks are managed

Additionally:

- ☐ Check contracts with suppliers, contractors and service providers include expectations around respectful behaviour and reporting concerns.



What is changing (from 2027)

The Government is strengthening the duty on employers to properly consider flexible working requests and give a clear, reasonable refusal where a request cannot be accommodated.

- Employers must give a written, reasonable explanation when refusing a request.
- Councils must show they have considered alternatives (e.g. trial periods, partial adjustments).
- Employees can still make two requests per year, and decisions must be made within two months.
- The eight statutory business reasons remain, but the threshold for justification is higher.

This change applies to all employees employed on or after 1 January 2027, including those hired before that date.

What the Council needs to do

- ☐ Ensure the Flexible Working Policy is understood by the team and members.
- ☐ Have a standard form/process for making a request.
- ☐ Ensure all meetings are logged and that a meeting with the employee has taken place before any refusal
- ☐ Maintain a record of all requests, decisions and reasons, including alternatives considered.
- ☐ Ensure decisions are not made by one person alone — use the staffing committee or at least one other councillor/Chair

Additionally:

- ☐ Where relevant, communicate process to line managers to ensure they follow the same process.

Pregnancy & Maternity Dismissal Protection



What is changing (from 2027)

The Government is strengthening dismissal protection for pregnant employees and those returning from maternity leave.

- It will be unlawful to dismiss an employee during pregnancy, maternity leave, and for **six months after returning**, unless the council can show a fair reason and a fair, well-documented process.
- Councils must demonstrate they considered alternatives to dismissal.
- Any dismissal in this period will face higher scrutiny from tribunals and the Fair Work Agency.

What the Council needs to do

- ☐ Adopt CHRGs updated Family Friendly Policies
- ☐ Ensure capability or conduct concerns are raised when they arise and not left until maternity leave or return.
- ☐ Provide support for those returning from maternity leave to discuss support, adjustments etc (like an induction checklist).
- ☐ Keep clear factual notes of all conversations and decisions.

Additionally:

- ☐ Check whether any ongoing capability or conduct issues involve someone who may fall into the protected period.
- ☐ Seek CHRGs HR advice before any dismissal



What is changing (from 2027)

The Government is introducing a statutory right to one week of bereavement leave for all employees, regardless of length of service.

- Employees will be entitled to one week of leave following the death of a close family member.
- The leave will be a day-one right — no qualifying period.
- Councils must handle requests sensitively, consistently and without delay.

There will also be a new right of at least one week of statutory bereavement leave introduced for parents who experience pregnancy loss before 24 weeks (extending current law on parental bereavement leave).

What the Council needs to do

- ☐ CHRGS will provide an updated policy for adoption.
- ☐ Keep confidential records of requests, dates taken and any additional support needs.
- ☐ Provide managers with guidance on responding sensitively and consistently to bereavement requests.

HR01 – Recruitment Policy

Aylsham Council



Adopted: 22nd January 2026

Revised: 9th September 2026

Review: Biennially or as changes are required.

HR01 - Recruitment Policy

1. Introduction

- 1.1. We will follow fair and lawful processes in recruitment.
- 1.2. This policy:
 - a Goes through each step of our process for attracting and selecting external and internal job candidates
 - b Explains how we make sure that we avoid discrimination and any unfairness in recruitment
 - c Sets out how we tackle the risk of unconscious bias
 - d Explains how we incorporate special cases, such as agency workers and those selected for redundancy, into our recruitment processes
- 1.3. This Policy does not form part of your contract of employment. We reserve the right to amend or remove this Policy.
- 1.4. This Policy applies to all external and internal candidates or prospective candidates for employment vacancies within our business.

2. An overview of the recruitment process

Our recruitment process for any vacancy includes the following steps

- 2.1. Identifying a need to recruit: Once the Staffing Committee has identified a need to recruit, approval to recruit will be sought from Full Council
- 2.2. Preparing a job description: We will prepare a full job description and a person specification or review any existing documents for the position. These documents will include the key criteria we are looking for in any applicant and will help us to prepare job adverts.
- 2.3. Internal recruitment: We will consider whether to open the vacancy to internal applicants before advertising externally. **Advertising externally does not preclude internal** applicants
- 2.4. Receiving applications and shortlisting: We will look at all applications received and shortlist candidates. We will only consider information submitted as part of the application process when making decisions on shortlisting. We will not look at any online profiles which may exist or seek personal comments from any shared contacts and we will not accept CVs. This is to make sure that we treat all applicants fairly and equally.

- 2.5. Selection process: The selection process will vary depending on the vacancy. Examples of selection methods which we may use include structured interviews and presentations
- 2.6. Interviews: Interview panels will be made up of a minimum of three people, one of which should include the direct line manager of the proposed role. Interview panels for the position of Town Clerk should be made up of a minimum of 3 councillors. Only councillors on the panel may vote, with the Chair of the panel having the casting vote. Officers in attendance will act in an advisory role to councillors.
- 2.7. Offer: We will make any offers in writing. They will usually be conditional on the following:
- a Receipt of two satisfactory references, which will be reviewed by the Interview Panel.
 - b Completion of our Right to Work checks
 - c Completion of a health assessment – for certain roles only
 - d Receipt of confirmation of essential qualifications – for certain roles only
 - e Satisfactory enhanced DBS check – for certain roles only

3. Questions about health and reasonable adjustments

- 3.1. We will not generally ask candidates any questions about their health or any disabilities before any job offer is made. However, we may do so in the following circumstances:
- a To find out whether a candidate is able to carry out an assessment which forms part of the application process.
 - b To understand whether a candidate would be able to carry out a function which is central to the job.
 - c To find out whether any reasonable adjustments need to be made to allow the candidate to take part in our recruitment processes.
 - d To support positive action in employment for disabled people.

4. Internal and external recruitment

- 4.1 For each vacancy which arises, we will consider the needs of the Council and what we are aiming to achieve from the recruitment process. This will involve

consideration of whether the vacancy should be advertised internally before any external advertisement.

5. Our commitment to avoiding discrimination and unfairness in our recruitment processes

5.1. We take the following steps to avoid discrimination and unfairness in our recruitment processes

- a We ask candidates if they need any adjustments to help them with the recruitment process. We will action any reasonable requests made.
- b Our application forms do not require the submission of any details relating to protected characteristics (such as sex, marital status, age, religion and belief, sexual orientation and disability)
- c We generally follow a competency-based structure for interviews.
- d We keep our recruitment marketing techniques under review to make sure that we reach a broad range of potential candidates. For example, we consider advertising using several forms of media.

5.2. **We will endeavour to advertise vacancies to military veterans in accordance with the Armed Forces Covenant**

6. How we deal with the risk of unconscious bias in recruitment

6.1. The brain makes judgments every day by processing information at rapid speed. The brain interprets the information it receives to make judgments and to influence actions. This is not something that we can stop from happening. However, this thought process can also cause us to treat some people more favourably or less favourably. This is what we mean by unconscious bias.

6.2. We recognise that unconscious bias is not something that can be prevented; it is human nature. However, we believe that by making those involved in recruitment aware of it, we can help them to step back and assess any decision they make for the presence of unconscious bias. To assist with this, we will

- a Make sure that recruitment decisions are not made by one individual – to make sure that a breadth of opinion is taken into account and to reduce the impact of any unconscious bias
- b Standardise aspects of our recruitment processes so that candidates are judged on objective criteria and standards in certain areas

7. Use of AI in Recruitment

7.1. We do not use AI in our recruitment process

8. Special situations: redundant employees, agency workers and fixed-term workers

8.1. Employees who have been provisionally selected for redundancy will be made aware of all vacancies existing within the Council and will be kept informed should any new vacancies arise. For further information, please see our *Redundancy Policy*.

8.2. We will inform agency workers and those on fixed term contracts when vacancies become available

9. Expenses

9.1. Any expenses incurred in travelling to or attending any interview or assessment with us are the sole responsibility of the candidate. We will not refund any expenses.

10. Data protection

10.1. All information and documentation collated in relation to candidates as part of our recruitment processes will be stored, processed and destroyed in line with our *Data Protection Policy*.

11. Complaints

10.1 If any candidate is unhappy with the way we have handled their application, then they should raise this with The Town Clerk .

12. Useful links and contacts

11.1 The following internal policies and links are referred to in this Policy and contain additional information and guidance:

a *Data Protection Policy*

b *Redundancy Policy*

c *Right to Work Policy*

d Equal Opportunities Policy

13. Administration of the Recruitment Policy

- 12.1 The town clerk is responsible for the administration of the Recruitment Policy.
Should you have any feedback, please contact the town clerk.

HR06 – Wellbeing Policy

Aylsham Town Council



Adopted: 19th December 2025
Revised:
Review: Biennially or as changes are required.

HR06 - Wellbeing Policy

1. Introduction

- 1.1. We, the Town Council, have a legal duty to manage risks to the health and safety of our employees. This includes considering the wellbeing of all employees at work. 'Wellbeing' encompasses mental, physical, emotional and social health. We will support you in each of these areas.
- 1.2. Please note that this Policy does not form part of your contract with us. We reserve the right to amend or remove this Policy.
- 1.3. This Policy:
 - a Sets out our commitment to workplace wellbeing
 - b Identifies the different aspects of wellbeing and how they might impact you at work
 - c Provides practical advice on things that you and we can do to maintain your workplace wellbeing
 - d Provides details of support available from us and others to assist with the promotion of wellbeing both in and outside of the workplace
- 1.4. This Policy applies to all those working for us at any location and in any capacity. It applies to all our employees and volunteers

2. Our wellbeing principles

- 2.1. We are guided by the following general principles in our approach to wellbeing:
 - a We will give non-judgmental and proactive support to individuals who experience mental health problems.
 - b We will set you realistic targets so that you do not work unreasonable hours.
 - c We will comply with our legal duties to consider reasonable adjustments in the workplace.
 - d We will identify any wellbeing issues by asking about health and wellbeing in appraisals and at exit interviews.
 - e We will treat all matters relating to individuals and their health problems in the strictest confidence in accordance with our Data Protection Policy

3. The different aspects of workplace wellbeing

There are several different aspects of health and wellbeing. We aim to provide a healthy and balanced workplace which supports each of these aspects.

3.1. Mental wellbeing

- a Mental wellbeing concerns your feelings and any health conditions which are not physical in nature. How you feel has a significant impact on your wellbeing. Mental health issues,

such as stress, anxiety and depression, can dramatically impact your working life and your ability to work effectively.

- b We want to have an open dialogue with you regarding your mental wellbeing.
- c If your work affects your mental health, then you should raise this with the Town Clerk. They will offer support to manage the issue or point you in the right direction. For example, if you feel that your workload is unmanageable and is negatively impacting your mental wellbeing, then we can review your workload to ensure that adequate support is in place for you.
- d A healthy work-life balance is important. We encourage you to approach us informally with any requests you may have for flexibility, whether short-term or long-term, to support your mental wellbeing. We also have a Flexible Working Policy for formal requests.
- e We encourage you to take practical steps to safeguard your mental wellbeing at work on a day-to-day basis, for example, by taking regular breaks during the working day.
- f Use your holiday entitlement effectively to help to maintain a healthy work-life balance. Do not work whilst you are on holiday.
- g Employees of Aylsham Town Council are able to access a counselling service through DAS. DAS will provide all employees (including any members of their immediate family who permanently live with them) of the policyholder with a confidential counselling service over the phone including, where appropriate, onward referral to relevant voluntary and/or professional services. To contact the counselling helpline, phone DAS on 0117 934 2121.

3.2. Emotional wellbeing

- a Emotional wellbeing is an aspect of mental wellbeing which focuses on how you feel about the workplace. Do you have a clear understanding of the expectations placed on you? Do you feel supported in your workplace development and career progression?
- b We will ensure you are clear about the expectations placed on you in your job role by providing a full job description and regular appraisals
- c We will discuss your career aspirations with you, so that you feel happy and fulfilled in the role you are doing and the direction of your career.
- d We have in place a clear appraisal process which encourages discussion between us in relation to current performance and future work plans.
- e We encourage you to let us know if you experience emotional difficulties associated with your work so that we can provide you with support. You should raise issues with the town clerk in the first instance.
- f We have a Grievance Policy which you can use if you believe that emotional wellbeing issues are not being handled effectively.
- g We recognise that it is possible that you may feel attacked, bullied or harassed by non-employees due to the nature of the work we do as a Council. If this occurs you should first seek a solution through your manager and failing that follow the Grievance procedure to secure an adjustment to reduce the issue for your wellbeing.

3.3. Physical wellbeing

- a Physical wellbeing relates to your body's physical health. This includes things such as diet, exercise, injuries and physical health conditions.

- b We will support your physical wellbeing in the workplace in several ways. We have health and safety procedures in place to minimise any risks to physical health posed by the working environment itself. For more details, please see our Health & Safety Policy.
- c It is important to stay hydrated during your working day. We provide water coolers on site, which we encourage you to use. NHS guidance recommends drinking a minimum of 1.2 litres of water per day.
- d You can make a difference to your physical wellbeing by making good health choices: healthy eating, undertaking regular physical exercise, refraining from smoking and avoiding excessive alcohol consumption.
- e We encourage you to take breaks away from your workstation during the day. Consider taking a short walk during your lunch break – outside if possible. If you experience difficulty taking an exercise break and this affects your wellbeing, you should raise this with the Town Clerk. They will offer support to allow you to take reasonable time out.

3.4. Social wellbeing

- a The employment relationship is an interactive one. You work alongside colleagues. The workplace should be a place of collaboration and not isolation. Social wellbeing is focused on promoting healthy interactions in the workplace, preventing isolation and encouraging respect among colleagues.
- b We have a zero-tolerance policy on bullying and harassment in the workplace. See our Dignity at Work Policy for further information. If you have difficulties with workplace relationships, then this can be a source of stress and unhappiness at work, impacting your emotional and mental wellbeing. We urge you to reach out to the Town Clerk for support with any issues you may experience. You can also utilise our *Grievance Policy* to ensure that workplace issues are handled and resolved appropriately.
- c You can support the emotional wellbeing of your colleagues by reviewing our policies on (e.g. Dignity at Work, Equality & Diversity, Councillor/Officer Protocol) to check that your own social behaviours are in line with our expectations of you.
- d If your role is office- or site-based, we encourage you to make an effort to make time during your working day for social interaction with your colleagues. This could mean taking a tea break with a colleague or taking the time to ask them a non-work related question. This is likely to improve your social wellbeing and that of others.

4. Return to work following absence

- 4.1. If you are absent from work because of ill health, then we will support you on your return to work, in line with our Absence Management Policy. If we believe that we will be assisted by medical input, then we may ask for your consent to get a report from your doctor and/or occupational health. Options such as a phased return or adjusted duties will be considered as part of any return-to-work process. We want to facilitate a positive, healthy and effective return to work, in line with our wellbeing principles set out above.

5. Useful links and contacts

- 5.1. The following links and contacts may be of use:

- a) Dignity at Work Policy
- b) Equal Opportunities Policy

- c) Grievance Policy
- d) Flexible Working Policy
- e) Councillor / Officer Protocol
- f) DAS Counselling Service 0117 934 2121
- g) Samaritans – <https://www.samaritans.org>
- h) Working Well Trust - <https://workingwelltrust.org/contact/>
- i) MIND – www.mind.org.uk

6. Administration of the Wellbeing Policy

- 6.1. The Town Clerk is responsible for the administration of the Wellbeing Policy. Should you have any feedback, please contact the Town Clerk.

HR15 – Whistleblowing Policy

Aylsham Town Council



Adopted: 26th May 2026

Revised:

Review: Biennially or as changes are required.

HR15 - Whistleblowing Policy

1. Introduction

- 1.1. This Policy outlines what you should do if you suspect something at work is putting you or others in danger or is illegal or unethical.
- 1.2. This Policy applies to our employees, workers, officers, consultants, self-employed contractors, casual workers, agency workers, volunteers and interns.
- 1.3. This Policy does not form part of your contract with us. We reserve the right to amend or remove this Policy.

2. What is whistleblowing?

- 2.1. Whistleblowing is the name given to the reporting of certain types of wrongdoing by people who work for us. This will usually, although not always, be something you have seen or noticed at work. We aim to maintain high standards of integrity in everything we do. However, all organisations can occasionally be affected by conduct that is dangerous, against the law or that breaches ethical or professional codes. We will take your concerns seriously; they will be thoroughly investigated, and you can be confident there will be no reprisals.
- 2.2. The types of concerns you may want to 'blow the whistle' about include any activity which you suspect:
 - a Is criminal
 - b Shows a failure to comply with any legal, professional or regulatory obligation
 - c Poses a danger to health and safety
 - d May damage the environment
 - e May breach of our Bribery Policy
 - f May facilitate tax evasion
 - g Shows financial fraud or mismanagement or the deliberate concealment of any of the above matters
- 2.3. Genuine concerns raised in relation to any of the above are likely to amount to whistleblowing. If you are not sure whether something you wish to raise is covered by this Policy, then speak to the Town Clerk or Chair of the Staffing Committee who will be able to provide guidance.

3. What you should do if you have a complaint but are not 'blowing the whistle'

- 3.1. If you have a complaint or issue which does not fall into the categories listed above or relates to a personal matter, then these should generally be raised using our Grievance Policy. If your complaint relates to the conduct of others towards you, then you should also refer to our Dignity at Work policy

4. How to raise a whistleblowing concern

- 4.1. You should usually raise a whistleblowing concern with the Town Clerk. This can be done informally and does not need to be done in writing. The Town Clerk can provide advice regarding appropriate next steps. If the matter involves the Town Clerk or if the concern you wish to raise is very serious, then you should proceed immediately to the more formal process set out below.
- 4.2. If the matter is not or cannot be resolved informally, you should put your concern in writing and send it to The Chair of the Staffing Committee. This can be done either by letter or by email. You should state that you are raising a concern under the Whistleblowing Policy. Include as much information in your correspondence as possible, including facts, events, dates, times and the people involved.
- 4.3. We will hold a meeting with you to discuss the issues you have raised. You are entitled to be accompanied at this meeting, and any other meetings held under this Policy, by a work colleague or trade union representative. You (and your companion, if appropriate) may be asked to keep the matter confidential whilst an investigation takes place.
- 4.4. We will investigate your concerns in full. We will keep you informed of our progress insofar as we can, but there may be elements which we decide should remain confidential.
- 4.5. We will confirm the outcome of our investigation to you insofar as we can. If you are dissatisfied with the process in any way, then you can raise this with *[insert relevant person]*.

5. Confidentiality

- 5.1. We discourage you from making anonymous disclosures as they are very difficult for us to investigate. We cannot properly establish whether allegations are credible without being able to ask you for more details or clarification, and this makes it hard to reach an informed decision.
- 5.2. We will protect anyone who blows the whistle in good faith, even if we do not agree that the allegations they raise are correct. You should feel able to openly raise issues with us under this Policy. However, we understand that the subject matter covered by whistleblowing can be sensitive. If you are concerned about possible reprisals, whether from colleagues or others, you should tell the Staffing Committee who will be able to provide you with appropriate support and reassurance.
- 5.3. The sensitive nature of whistleblowing investigations means that, aside from those involved in the whistleblowing process set out above, we will try to keep your personal involvement confidential. There may be circumstances where we cannot do this, and in those circumstances, we will discuss the matter with you to explain our position.

6. External disclosures

- 6.1. This Policy outlines the process for raising, investigating and resolving wrongdoing in the workplace. It is rarely necessary – or, from our point of view, desirable – for anyone outside the business to become involved when a whistleblowing allegation is made.
- 6.2. In some exceptional circumstances, you may decide to go to an external body – an industry regulator, for example. That might be the case if you believe, for example, that someone senior is involved in a cover-up – but again, it is better to raise the matter internally first.
- 6.3. This Policy covers the actions of third parties such as suppliers, service providers and clients, as well as those of our staff. Should you have concerns about a third party, you are encouraged to raise them with us before approaching anyone else. The Town Clerk will be able to explain how you should proceed.
- 6.4. Telling the media about a concern – particularly before or during an internal investigation – is almost never justified or appropriate in any situation. We strongly discourage you from doing so, and we will treat any such contact with the press as a serious disciplinary issue justifying dismissal unless exceptional circumstances exist. We would normally expect you to have taken all reasonable steps to deal with the matter internally or with an external regulator and to have taken full advice from a lawyer or from Protect (see contact details below) before being justified in approaching the press.

7. Protection for whistleblowers

- 7.1. If you raise genuine concerns under this Policy, even if you turn out to be mistaken, we will support you and you will not face any action as a result.
- 7.2. We will not dismiss you, or treat you less well, because you've blown the whistle in accordance with this Policy.
- 7.3. You must not treat others badly if they have raised concerns under this Policy, nor must you threaten them in any way. If you do, you may face disciplinary action which could include dismissal for gross misconduct. **A Councillor who mistreats and employee for whistleblowing could face a case under the code of conduct or possible civil action.** The whistleblower may also be able to bring legal action against you.
- 7.4. If you believe that you have been treated badly in any way after having raised a whistleblowing concern with us, then you should raise this matter with the Town Clerk or Chair of the Staffing Committee and/or raise a grievance under our Grievance Policy.

8. Abuse of this Policy

- 8.1. All whistleblowers must act in good faith. If we believe that you have raised issues under this Policy – which you knew were untrue – in bad faith or maliciously, then we will deal with this as a disciplinary matter under our Disciplinary Policy. You may be subject to sanctions up to and including dismissal for gross misconduct.

9. Useful links and contacts

- 9.1. The following policies contain additional information and may be relevant:

- a *Disciplinary Policy*
- b *Bribery Policy*
- c *Grievance Policy*
- d *Dignity at Work Policy*

9.2. You can get further advice on whistleblowing, confidentiality, and protection from reprisals at <https://protect-advice.org.uk/>. Protect is an independent charity that also offers an advice line (020 3117 2520).

10. Administration of the Whistleblowing Policy

10.1. The Town Clerk is responsible for the administration of the Whistleblowing Policy. Should you have any feedback, please contact townclerk@aylsham-tc.gov.uk

HR24 – Computers, Email and Internet Policy

Aylsham Town Council



Adopted: 7th May 2026

Revised: 9th September 2026

Review: Biennially or as changes are required.

HR24 - Computers, Email and Internet Policy

1. Introduction

- 1.1. IT and communications systems are of key importance to the Council. These systems must be used appropriately. There is a significant risk of damage to the Council and its reputation if you misuse them.
- 1.2. In this Policy, we set out the standards we require you to follow when using these systems and equipment. We also explain when we will monitor your usage, and for what purpose, and set out the sanctions for breaches of this Policy.
- 1.3. Please note that this Policy does not form part of your contract with us. We reserve the right to amend or remove this Policy.
- 1.4. This Policy applies to all employees and workers of the Council and anyone who has access to our IT and communications systems. This may include contractors, agency workers, casual workers, interns and volunteers.

2. Computers

- 2.1. You are responsible for the security of any IT equipment issued by us to you. You must not let any of your IT equipment be used by anyone else, whether at work or at home.
- 2.2. When working, either in the office or remotely, you are responsible for the security of your computer terminal. The screen should always be locked if the computer is left unattended.
- 2.3. You must shut down your computer at the end of each working day. We often schedule updates overnight and it is important that your computer is shut down for these updates to take effect.
- 2.4. You must not remove or tamper with any software systems installed on our computers. If you have an issue in relation to any software installed on your work computer, then you should contact the Town Council's IT Support for advice.
- 2.5. You should use unique passwords for each electronic device we issue to you. They should ideally include a random string of capital and lowercase letters, symbols and numbers, **or use a passphrase**. You should keep all passwords confidential and should not share them with anyone else (save as outlined below). You should change your passwords regularly.
- 2.6. You must provide us with details of all passwords on request and, in any event, on termination of employment.
- 2.7. You must report any loss of IT equipment to the Town Clerk immediately.
- 2.8. If you are issued with portable IT equipment by us, then you must make sure that it is stored safely and securely when being transported. If you are using our IT equipment whilst in a

public place, then others may be able to view your screen. Please make sure that you do not display any confidential information when using IT equipment in public.

- 2.9. If you are issued with any IT equipment (such as computers, monitors, keyboards or printers) for use when working remotely, then you must agree to return it to us on demand and, in any event, on termination of your employment. You are responsible for maintaining any IT equipment issued for remote use in a good condition. You are responsible for damage to any issued IT equipment, other than that caused by reasonable wear and tear.

3. Systems and data security

- 3.1. You must not download or install any software from external sources without the prior approval of the Town Council's IT support
- 3.2. You must not attach any devices (including USB sticks) to your work computer without the prior approval of the Town Council's IT support. This includes attaching any Bluetooth devices.
- 3.3. You must not use any device on public unsecured Wi-Fi unless we have installed a Virtual Private Network on the device and you have activated it.
- 3.4. We have a virus detection system installed on all our computers. You must not tamper with it or disable it. You can assist us in cyber security by making sure that you review all emails you receive from unknown sources. If you suspect that an email is not genuine, then you should contact the Town Council's IT support as soon as possible. Do not open the email or any attachments to it.

4. Email

- 4.1. The following rules should be followed when using email:
 - a You should avoid the use of slang, emojis and 'text speak' when sending work emails.
 - b Always consider the relevant recipients when sending an email – do not copy messages unnecessarily widely.
 - c You should not forward chain emails or send jokes.
 - d You should not forward emails from your work account to your private email address.
 - e Do not send emails which are or might be considered abusive, obscene, discriminatory, harassing or otherwise inappropriate in nature. If you receive such an email, then you should inform the Town Clerk or Chair of the Staffing Committee immediately. We have a zero-tolerance policy in relation to bullying and harassment in the workplace. Please see our Dignity at Work Policy for more details.
 - f Email correspondence is disclosable in legal proceedings. All messages should be treated as being potentially disclosable in a court of law.
 - g Email correspondence may also be disclosable as a freedom of Information Act request and or a Subject Access request. In effect making emails publicly available this should be considered before sending any correspondence. This applies to all forms of electronic communication.

- h You may also be required to provide details of any emails as part of an internal investigation, failure to do so could be deemed failure to follow a reasonable instruction
- i It is possible to enter into a legally binding contract via email. If your job role involves the negotiation of terms which could form a contract, then you should ensure that all correspondence is headed "Subject to contract".
- j You must not use your personal email address for work purposes.

5. Internet

- 5.1. We provide internet access in our workplace primarily for work. Personal use is only permitted on the basis set out in section 6.
- 5.2. When using the internet, do not access any web page or download any image, document or other file from the internet which could be regarded as illegal, offensive or immoral. As a general rule, if any person might be offended by the contents of a page or if the fact that our software has accessed a page might be a source of embarrassment or reputational damage, then viewing it will be regarded as a breach of this Policy.
- 5.3. You must not use our systems to post on chat rooms or social media sites unless you are doing so as part of your job.
- 5.4. If using generative AI, you must at all times act in accordance with our AI Powered Wording Services policy

6. Personal use of email and the internet

- 6.1. The Council provides email and internet access for work-related purposes. We acknowledge that some personal use will occur. However, excessive personal use of these resources during working hours may result in disciplinary action under our Disciplinary Policy.
- 6.2. The following guidance should be followed:
 - a Personal use should be minimal.
 - b Personal use should not interfere with your work commitments.
 - c Personal use must not commit the business to any costs.
 - d Personal use must always comply with our Dignity at Work, Equal Opportunities, Data Protection and Disciplinary Policies

7. Monitoring

- 7.1. Your use of our IT and communications systems (including computer, internet, email and telephone) may be monitored by us. Any such monitoring will only be carried out to the extent permitted by law and in accordance with our Data Protection Policy.
- 7.2. We may monitor and check emails and internet usage for reasons including the following:

- a To assess compliance with our rules and policies
- b To investigate alleged wrongdoing by you or others
- c To monitor performance, particularly if you are undergoing a performance management process and have been told that we will be monitoring your email and internet usage
- d To retrieve lost messages
- e To access messages and information if you are unable to do so directly (for example due to illness or other absence)
- f To comply with our legal obligations including internal and Monitoring Officer investigations.

8. Use of personal devices for work purposes

8.1. Our general rule is that personal devices are not allowed to be used for business purposes. However, there may be circumstances where you need to use certain personal devices (such as smartphones, laptops and tablets) for work. Any use must be in accordance with the following rules:

- a Any personal device (**Device**) must be approved by the Town Council's IT support before it can be connected to our systems and be used for work purposes. We may require you, at our cost, to implement additional security measures prior to approving your Device for work use.
- b When accessing work systems (e.g. intranet, CRM, cloud storage) from a personal device, you must only use approved applications for file sharing, communication, and remote work.
- c When accessing work systems from a personal device, you must always connect through a secure Virtual Private Network (VPN).
- d You must not use personal email, storage, or messaging apps for work-related communication or data transfers.
- e Any software systems installed by us to allow your Device to be used for work must not be tampered with or removed by you.
- f We reserve the right to monitor, intercept and remove any content on your Device which has been created by us or on our behalf to the extent permitted by law or for our legitimate business purposes. As your Device is a personal one, we are aware that inadvertent monitoring, interception, review and removal of personal data may occur. You should have no expectation of privacy in relation to any data on the device if you are using it for work purposes. Access could be in relation to an internal HR investigation or a Monitoring Officer investigation.
- g You must delete any data relating to the Council which is stored locally on your Device as soon as it is no longer required.
- h You must pay all costs associated with your Device and its use, including technical support.
- i You must cooperate with us and allow us to inspect your Device at any time on request. You will provide any necessary passwords or login details to enable us to have full access.

- j You must report any loss of the Device immediately to our IT Support.
 - k If you leave our employment or propose to sell or transfer your Device to someone else, then you agree to present your Device to us prior to transfer/termination to allow us to remove all council software and data from it.
- 8.2. Any breach of these rules may result in us revoking your permission to use your Device for work purposes. It may also result in disciplinary action up to and including dismissal or, in the case of a contractor or agency worker, the termination of your engagement.

9. Personal Devices and Emerging Technology

- 9.1. You must not use personal devices, including smart wearable technology, to record, monitor, live stream or transmit audio, video or images in the workplace or during work-related activities (unless expressly authorised in accordance with our GDPR and Data Protection Policy)
- 9.2. Smart wearable devices include any personal or work-issued equipment capable of recording, capturing, storing or transmitting audio, visual or other data. This includes, but is not limited to: smart glasses, smart watches, body-worn cameras and similar emerging technologies.
- 9.3. We may require you to remove or disable certain personal devices during working time or in specified work activities where there is a risk to confidentiality, data security or professional standards.
- 9.4. You are responsible for ensuring that personal devices used during working time do not compromise information security, privacy or the council's reputation.
- 9.5. Further details on the restrictions around using smart wearable devices are available in our GDPR and Employment Data Protection Policy.

10. Breaches of this Policy

- 10.1. Any breaches of this Policy will be handled under our Disciplinary Policy. **In the instance of Councillors via the code of conduct.** In the case of agency workers, contractors, casual workers and interns, we reserve the right to terminate your engagement in the event of a breach or an alleged breach of this Policy.
- 10.2. Certain behaviours in breach of this Policy may give rise to a criminal offence or other public concern. We may pass any evidence collated to the police or other relevant authority.
- 10.3. If you become aware of conduct of others which may be in breach of this Policy, you should report your concern immediately to the Town Clerk Our Whistleblowing Policy provides further guidance.

11. Useful links and contacts

- 11.1. The following internal policies are referred to in this Policy and contain additional information and guidance
 - a Disciplinary Policy
 - b Grievance Policy

- c Data Protection Policy
- d AI Powered Wording Policy
- e GDPR Policy
- f Employment Data Protection Policy

11.2. Our IT support can be contacted at any time in relation to the matters detailed in this policy

12. Administration of the Computers, Email and Internet Policy

12.1. The Town Clerk is responsible for the administration of the Computers, Email and Internet Policy. Should you have any feedback, please contact The Town Clerk

36 Employment Data Protection Policy¹

Aylsham Town Council



Adopted: 9th September 2026

Revised:

Review: Biennially or as changes are required.

¹ This policy has been drafted to be suitable for employers of all sizes. It should be noted that employers with fewer than 250 employees have a partial exemption from the requirement to document processing activities. They don't have to document all processing activities, only those which:

- are not occasional (e.g., are more than just a one-off occurrence or something they do rarely); or
- are likely to result in a risk to the rights and freedoms of individuals (e.g., something that might be intrusive or adversely affect individuals); or
- involve special category data or criminal conviction and offence data (as defined by Articles 9 and 10 of the UK GDPR).

Note for completion

Green type is discretionary and relevant to policies of your Council

Red type needs to be completed

Purple is information for you only to be removed before sending contract to employee.

1. Introduction

- 1.1. We need to gather and use information or 'data' about you as part of our business and to manage our relationship with you. This Policy sets out the things we must tell you about data protection.
- 1.2. We take the security and privacy of your data seriously and intend to comply with our legal obligations under the *Data Protection Act 2018* (2018 Act), the *Data (Use and Access) Act 2025*, and the *UK General Data Protection Regulation* (GDPR) in respect of data privacy and security.
- 1.3. This Policy applies to current and former employees, workers, volunteers, apprentices and consultants. If you fall into one of these categories, then you are a 'data subject' for the purposes of this Policy. You should read this Policy alongside your contract and any other notice we issue to you from time to time in relation to your data.
- 1.4. [We have measures in place to protect the security of your data in accordance with our *[Data Protection Policy]*].
- 1.5. The Council is a 'data controller' for the purposes of your personal data. This means that we decide how and why we process your personal data.
- 1.6. This Policy explains how we will hold and process your information. It explains your rights as a data subject. It also explains your obligations when obtaining, handling, processing or storing personal data in the course of working for, or on behalf of, the Council.
- 1.7. This Policy does not form part of your contract. We reserve the right to update this Policy at any time. It is intended that this Policy is fully compliant with the 2018 Act and the GDPR. If any conflict arises between those laws and this Policy, the Council intends to comply with the 2018 Act and the GDPR.

2. Data protection principles

- 2.1. Personal data must be processed in accordance with the following 'data protection principles.' It must:
 - a Be processed fairly, lawfully and transparently
 - b Be collected and processed only for specified, explicit and legitimate purposes
 - c Be adequate, relevant and limited to what is necessary for the purposes for which it is processed
 - d Be accurate and kept up to date. Any inaccurate data must be deleted or rectified without delay

- e Not be kept for longer than is necessary for the purposes for which it is processed
- f Be processed securely

2.2. We are responsible for ensuring and demonstrating compliance with these principles.

3. How we define personal data

- 3.1. 'Personal data' means information which relates to a living person who can be identified from that data (a 'data subject') on its own or when taken together with other information which is likely to come into our possession. It includes any expression of opinion about the person and an indication of the intentions of us or others in respect of that person. It does not include anonymised data.
- 3.2. This Policy applies to all personal data, whether it is stored electronically, on paper or in/on other materials.
- 3.3. This personal data might be provided to us by you or by someone else (such as a former employer, your doctor or a credit reference agency), or it could be created by us. It could be provided or created during the recruitment process or during the course of your contract, or after it has ended. It could be created by your **line manager, councillors** or other colleagues.
- 3.4. We will collect and use the following types of personal data about you:
 - a Recruitment information, such as your application form, references, qualifications and membership of any professional bodies and details of any pre-employment assessments.
 - b Your contact details and date of birth.
 - c The contact details for your emergency contacts.
 - d Your gender.
 - e Your marital status and family details.
 - f Information about your contract, including start and end dates, role and location, working hours, details of promotion, salary (including details of previous remuneration), pension, benefits and holiday entitlement.
 - g Your bank details and information in relation to your tax status, including your National Insurance number.
 - h Your identification documents, including your passport and driving licence and information in relation to your immigration status and right to work for us.
 - i Information relating to disciplinary or grievance investigations and proceedings involving you (whether or not you were the main subject of those proceedings).
 - j Information relating to your performance and behaviour at work.
 - k Training records.
 - l Electronic information in relation to your use of IT systems/swipe cards/telephone systems.
 - m Your images (whether captured on CCTV or video or by photograph).

n Any other category of personal data which we may notify you of from time to time.

4. How we define special categories of personal data

4.1. 'Special categories of personal data' are types of personal data consisting of information about:

- a Your racial or ethnic origin
- b Your political opinions
- c Your religious or philosophical beliefs
- d Your trade union membership
- e Your genetic or biometric data
- f Your health
- g Your sex life and sexual orientation

4.2. We may hold and use any of these special categories of your personal data in accordance with the law.

4.3. We may hold and use personal data relating to criminal allegations, offences, proceedings and convictions.

5. How we define processing

5.1. 'Processing' means any operation which is performed on personal data, such as:

- a Collection, recording, council, structuring or storing
- b Adaption or alteration
- c Retrieval, consultation or use
- d Disclosure by transmission, dissemination or otherwise making available
- e Alignment or combination
- f Restriction, destruction or erasure

5.2. 'Processing' includes processing personal data which forms part of a filing system and any automated processing.

6. How will we process your personal data?

6.1. We will process your personal data (including special categories of personal data) in line with our obligations under the 2018 Act.

6.2. We will use your personal data:

- a To perform the contract between us.

- b To comply with any legal obligation.
 - c If it is necessary for our legitimate interests (or for the legitimate interests of someone else). However, we can only do this if your interests and rights do not override ours (or theirs). You have the right to challenge our legitimate interests and request that we stop using your personal data. See details of your rights in section 12.
- 6.3. We can process your personal data for the purposes listed directly above without your knowledge or consent. We will not use your personal data for an unrelated purpose without telling you about it and the legal basis that we intend to rely on for processing it.
- 6.4. If you choose not to give us certain personal data, we may not be able to carry out some parts of the contract between us. For example, if we do not have your bank account details, we may not be able to pay you. It might also prevent us from complying with certain legal obligations and duties, such as paying the right amount of tax to HMRC or making reasonable adjustments in relation to any disability you may have.

7. Examples of when we might process your personal data

- 7.1. We have to process your personal data in various situations during your recruitment, employment (or engagement) and even following termination of your employment (or engagement).
- 7.2. For example (and see section 7.6 for more information about the situations marked with asterisks):
- a To decide whether to employ (or engage) you
 - b To decide how much to pay you and the other terms of your contract with us
 - c To check you have the legal right to work for us
 - d To carry out the contract between us, including, where relevant, its termination
 - e To train you and review your performance*
 - f To decide whether to promote you
 - g To decide whether and how to manage your performance, absence or conduct*
 - h To carry out a disciplinary or grievance investigation or procedure in relation to you or someone else
 - i To determine whether we need to make reasonable adjustments to your workplace or role because of your disability*
 - j To monitor diversity and equal opportunities*
 - k To monitor and protect the security (including network security) of the Council, you, our other staff, our customers and others
 - l To monitor and protect your health and safety and that of our other staff, our customers and third parties*

- m To pay you and provide pension and other benefits in accordance with the contract between us*
- n To pay tax and National Insurance
- o To provide a reference upon request from another employer
- ~~p To pay trade union subscriptions*~~
- q To monitor compliance by you, us and others with our policies and our contractual obligations*
- r To comply with employment law, immigration law, health and safety law, tax law and other laws which affect us*
- s To answer questions from insurers in respect of any insurance policies which relate to you*
- t To run our business and plan for the future
- u For the prevention and detection of fraud or other criminal offences
- v To defend the Council in respect of any investigation or litigation and to comply with any court or tribunal orders for disclosure*
- w For any other reason which we may notify you of from time to time

7.3. We will only process special categories of your personal data (see above) in certain situations in accordance with the law. For example, we can do so if we have your explicit consent. If we ask for your consent to process a special category of personal data, then we will explain the reasons for our request. You do not need to consent and can withdraw consent later if you choose to by contacting the Town Clerk.

7.4. We do not need your consent to process special categories of your personal data when we process it for the following purposes:

- a Where it is necessary for carrying out rights and obligations under employment law.
- b Where it is necessary to protect your vital interests or those of another person where you/they are physically or legally incapable of giving consent.
- c Where you have made the data public.
- d Where processing is necessary for the establishment, exercise or defence of legal claims.
- e Where processing is necessary for the purposes of occupational health or for the assessment of your working capacity.

7.5. We process information about criminal convictions for the following reasons:

- a Where it is necessary in the recruitment and vetting process to ensure a candidate is suitable for a sensitive role.
- b Where it is necessary to protect staff, property, residents, or confidential assets from significant and documented risks of unlawful acts.

7.6. We might process special categories of your personal data for the purposes in paragraph 7.2 which have an asterisk beside them. In particular, we will use information in relation to:

- a Your race, ethnic origin, religion, sexual orientation or gender to monitor equal opportunities.
- b Your sickness absence, health and medical conditions to monitor your absence; assess your fitness for work; pay you benefits; comply with our legal obligations under employment law, including making reasonable adjustments; and look after your health and safety.
- c ~~Your trade union membership to pay any subscriptions and~~ to comply with our legal obligations in respect of trade union members.

8. Automated decision-making and profiling

EITHER [[We do not take automated decisions about you using your personal data or use profiling in relation to you.]

~~Include the above clause or the amended clauses below depending on where you use automated processes.~~

OR

~~8.1. [We may use automated systems or software tools that process personal data to assist with employment-related decisions, including:~~

- ~~a Recruitment screening or candidate matching tools.~~
- ~~b Analytics used for performance tracking or workforce planning.~~
- ~~c Systems that flag compliance issues or anomalous activity.~~
- ~~d [insert any other relevant systems/tools]~~

~~8.2. We do not make decisions about you that are solely based on automated processing which produce legal or similarly significant effects, unless:~~

- ~~a such processing is necessary for entering into or performing a contract;~~
- ~~b authorised by law; or~~
- ~~c carried out with your explicit consent.~~

~~8.3. If we ever rely on such a process, you will be notified and provided with the right to request human review, express your views and challenge the decision.~~

~~8.4. Any automated tools we use are for business purposes such as improving efficiency, supporting decision making or ensuring compliance.]~~

~~8.5. **OR** [If you use automation/profiling in some other way, explain the process.]]~~

9. Recording devices and smart wearable devices

9.1. Smart wearable devices include any personal or work-issued equipment capable of recording, capturing, storing or transmitting audio, visual or other data. This includes, but is not limited to: smart glasses, smart watches, body-worn cameras and similar emerging technologies.

9.2. Smart wearable devices are capable of collecting personal data, including special category data, whether intentionally or inadvertently. This includes devices that record automatically, are voice-activated or create the appearance of recording.

- 9.3. The use or wearing of smart wearable devices during working time may create a perception of recording or surveillance, even where no recording takes place. You must be mindful of this and avoid conduct that could reasonably cause concern, discomfort or distress to others.
- 9.4. You must not make any audio or visual recordings, or capture images or data relating to colleagues, clients, customers or third parties in the course of their work.
- ~~9.5. The use of personal smart wearable devices for recording or data capture during working time is strictly prohibited [unless:~~
~~a — it has been formally approved by us; and~~
~~b — there is a clear and lawful basis for processing the data; and~~
~~c — appropriate privacy information and safeguards are in place.]~~
- 9.6. Any unauthorised recording, transmission or storage of personal data using smart wearable devices may constitute a data protection breach and will be treated as a serious matter, which may lead to disciplinary action and/or regulatory reporting.

10. Sharing your personal data

- 10.1. Sometimes, we might share your personal data with ~~[partners, professional support providers]~~ our contractors and agents to carry out our obligations under our contract with you or for our legitimate interests.
- 10.2. We require those people and companies to keep your personal data confidential and secure and to protect it in accordance with the law and our policies. They are only permitted to process your data for the lawful purpose for which it has been shared and in accordance with our instructions.
- 10.3. We will share your personal data with members of the Staffing committee only when this is necessary for the Committee to undertake its functions.
- 10.4. ~~[Set out the legitimate activities which third parties do, such as payroll, legal support, HR support, Occupational health.]~~
- ~~a Processing of payroll, including PAYE and pension processing~~
 - ~~b HR support~~
 - ~~c Legal support~~
 - ~~d Reportable health and safety incidents~~
 - ~~e Insurance claims~~
 - ~~f Occupational Health~~
 - ~~g Reference requests~~
- 10.5. ~~[[We do not send your personal data outside the European Economic Area. If this changes, we will tell you. We'll also explain the protections that are in place to protect the security of your data.] or [Confirm that data will be sent outside the EU and the protections that are in place]]~~

11. How should you process personal data for the Council?

- 11.1. Everyone who works for, or on behalf of, the Council has some responsibility for ensuring data is collected, stored and handled appropriately, in line with this and other relevant policies.
- 11.2. The Council's Data Protection Officer (**DPO**) (~~The DPO is The Clerk / another named officer~~) is responsible for reviewing this Policy and updating the ~~Staffing Committee~~ on the Council's data protection responsibilities and any risks in relation to the processing of data. You should direct any questions in relation to this Policy or data protection to the DPO.

- 11.3. You should only access personal data covered by this Policy if you need it for the work you do for, or on behalf of the Council and only if you are authorised to do so. You should only use the data for the specified lawful purpose for which it was obtained.
- 11.4. You should not share personal data informally.
- 11.5. You should keep personal data secure and not share it with unauthorised people.
- 11.6. You should regularly review and update personal data which you have to deal with for work. This includes telling us if your own contact details change.
- 11.7. You should not make unnecessary copies of personal data, and you should keep and dispose of any copies securely.
- 11.8. You should use strong passwords.
- 11.9. You should lock your computer screens when not at your desk.
- 11.10. ~~Personal data should be encrypted before being transferred electronically to authorised external contacts. [Speak to the Clerk / your line manager for more information on how to do this.]~~
- 11.11. Consider anonymising data or using separate keys/codes so that the data subject cannot be identified.
- 11.12. Do not save personal data to your own personal computers or other devices.
- 11.13. Personal data should never be transferred outside the European Economic Area except in compliance with the law and with the authorisation of the DPO.
- 11.14. You should lock drawers and filing cabinets. Do not leave documents that contain personal data on your desk or anywhere else that can be accessed by unauthorised people.
- 11.15. You should not take personal data away from Council's premises without authorisation from ~~[The Clerk / your line manager]~~ or the DPO.
- 11.16. Personal data should be shredded and disposed of securely when you have finished with it.
- 11.17. You should seek support from the DPO if you are unsure about data protection or if you notice any areas of data protection or security we can improve upon.
- 11.18. Any deliberate or negligent breach of this Policy by you may result in disciplinary action being taken against you under our Disciplinary Policy
- 11.19. It is a criminal offence to conceal or destroy personal data which is part of a subject access request (see below). This conduct would also amount to gross misconduct under our Disciplinary Policy, and you could be dismissed.

12. How to deal with data breaches

- 12.1. If this Policy is followed, we should not have any data breaches. But if a breach of personal data occurs (whether in respect of you or someone else), then we must take notes and keep evidence of that breach. If the breach is likely to pose a risk to the rights and freedoms of individuals, then we must notify the Information Commissioner's Office within 72 hours, where

feasible. If the breach is likely to result in a high risk to your rights and freedoms, then we will let you know about it.

- 12.2. If you are aware of a data breach, then you must contact the DPO immediately and keep any evidence you have in relation to the breach.

13. Subject access requests

- 13.1. Data subjects can make a 'subject access request' (**SAR**) to find out what information we hold about them. This request must be made in writing. If you receive a SAR, you should forward it immediately to the DPO who will coordinate a response.
- 13.2. To make a SAR in relation to your own personal data, you should write to the DPO. We must respond within one month unless the request is complex or numerous, in which case the period in which we must respond can be extended by up to two months.
- 13.3. There is no fee for making a SAR. However, if your request is manifestly unfounded or excessive, we may charge a reasonable administrative fee or refuse to respond to your request. We normally work on the basis that any request which will take more than a day to deal with is likely to be manifestly excessive, and in those circumstances, we believe a reasonable charge is one working day's salary for you.

14. Your data subject rights

- 14.1. You have the right to information about what personal data we process, how we process it and on what basis, as set out in this Policy.
- 14.2. You have the right to access your own personal data by way of a SAR (see above).
- 14.3. You can correct any inaccuracies in your personal data by contacting the DPO.
- 14.4. You have the right to request that we erase your personal data where we were not entitled under law to process it or where it is no longer necessary to process the data for the purpose for which it was collected. You can request erasure by contacting the DPO.
- 14.5. During the process of requesting that your personal data be corrected or erased, or while you are contesting the lawfulness of our processing, you can ask for the data to be used in a restricted way only. To do this, contact the DPO.
- 14.6. You have the right to object to data processing where we rely on a legitimate interest to do so and you think that your rights and interests outweigh our own and you wish us to stop.
- 14.7. You have the right to object if we process your personal data for the purposes of direct marketing.
- 14.8. You have the right to receive a copy of your personal data and, with some exceptions, to transfer your personal data to another data controller. We will not charge for this and will, in most cases, aim to do this within one month.
- 14.9. With some exceptions, you have the right not to be subjected to automated decision-making.
- 14.10. You have the right to be notified of a data security breach concerning your personal data where that breach is likely to result in a high risk of adversely affecting your rights and freedoms.

- 14.11. In most situations, we will not rely on your consent as a lawful ground to process your data. If we do request your consent to process your personal data for a specific purpose, you have the right not to consent or to withdraw your consent later. To withdraw your consent, you should contact the DPO.
- 14.12. You have the right to complain to the Information Commissioner. You can do this by contacting the Information Commissioner's Office directly. Full contact details, including a helpline number, can be found on the Information Commissioner's Office website (www.ico.org.uk). The Information Commissioner's Office website has more information on your rights and our obligations.

15. Data retention

- 15.1. We will only retain personal data and sensitive data for as long as necessary for the purposes for which we collected it. After this time, it will be deleted or archived.
- 15.2. We will maintain retention policies and procedures to ensure personal data is deleted after an appropriate time unless a law requires that data to be kept for a minimum time.
- 15.3. We will make sure data subjects are provided with information about the period for which data is stored and how that period is determined in any applicable Privacy Notice.
- 15.4. Further details of our data retention are contained in the Council's Retention Policy.

16. Data protection complaints

- 16.1. If you feel, at any time, that we may have breached data protection rules in relation to your personal data then you are able to file a complaint by ~~EITHER [completing and submitting the electronic form which can be accessed [explain where the form can be accessed], with paper copies being available from [HR] OR [emailing the Town Clerk using the email title: Data protection complaint].~~
- 16.2. We undertake to acknowledge receipt of the complaint within 30 days of receipt.
- 16.3. We will investigate the complaint, keep you informed of progress and inform you of the outcome in writing.²

17. Useful links and contacts

- 17.1. The following internal policies should be read alongside our [*Data Protection Policy*] and provide further guidance:
- a *Recruitment Policy*
 - b *Disciplinary Policy*
 - c *Appraisal Policy*
 - d *Training & Development Policy*
 - e *Computer, Email and Internet Policy*

² This section reflects the complaint procedure set out in s164A Data Protection Act 2018 which was inserted by the *Data (Use and Access) Act 2025* which received Royal Assent in June 2025. This provision anticipates s164A being enacted.

f *Homeworking Policy*

g *Document Retention Policy*

17.2. Our DPO at the time of publication of this Policy is Faye LeBon. Our DPO can be contacted via townclerk@aylsham-tc.gov.uk. If our DPO is no longer the person detailed in this Policy, then you should contact the Staffing Committee for details of our current DPO.

17.3. Useful information and guidance about the matters covered in this Policy can be found on www.ico.org.uk.

18. Administration of the Data Protection Policy

18.1. The Town Clerk is responsible for the administration of the Employment Data Protection Policy. Should you have any feedback, please contact the Town Clerk.

HR10 – Social Media Policy

Aylsham Town Council



Adopted:
Revised:
Review: Biennially or as changes are required.

HR10 - Social Media Policy

1. Introduction

- 1.1. Social Media is an important tool for all Councils, but it is not without its difficulties. Boundaries which exist in the 'real world' are easy to 'blur' in an online forum.
- 1.2. This Policy:
 - a Explains what we mean by the term 'social media'
 - b Sets out a framework of expected standards and behaviour both in terms of personal social media use and business use
 - c Sets out the implications if those standards are not met
- 1.3. Please note that this Policy does not form part of your contract with us. We reserve the right to amend or remove this Policy.
- 1.4. This Policy applies to all employees and workers in our Council and anyone who could be identified as being associated with us, including contractors, agency workers, casual workers, interns and volunteers.

2. What is 'Social Media'?

- 2.1. 'Social media' includes online communications and applications through which communications, media and messages can be shared. The 'social' aspect refers to the fact that you are interacting and sharing with other people.
- 2.2. There are different types of social media. Examples include:
 - a Social networks: the most well-known form of social media, such as Facebook, LinkedIn and X (formally Twitter).
 - b Media sharing networks: These are used for sharing photographs, videos and other forms of media, such as Instagram and Snapchat.
 - c Discussion forums: These are forums where particular topics of interest can be discussed, such as Reddit and Mumsnet.
 - d Consumer review networks: These are sites which allow you to leave reviews in relation to products, services and brands, such as TripAdvisor.
 - e Blogs: These are used for publishing and commenting on articles on different topics. Many businesses have their own blogs on their corporate web platforms, and many individuals have blogs chronicling things which they wish to share.

3. Personal use of Social Media

- 3.1. You should keep personal use of social media to a minimum during working time. Further details in this regard can be found in our *Computer, Email and Internet Policy*. Personal social media use should not negatively impact your productivity or your ability to meet deadlines. ~~[Personal notifications must be switched off during the working day to avoid distraction.]~~
- 3.2. There may be occasions when your actions on social media in a personal capacity impact your employment with us. Even if you do not name us as your employer, people who know you and where you work may still make an association with us, or people might use 'jigsaw' identification (putting together information from more than one source) to discover you work for us. We have a right to protect our legitimate business interests.
- 3.3. Accordingly, we need you to follow these rules:
 - a You must not act inappropriately in your interactions on social media. This includes acting in a discriminatory manner, harassing others or being rude online.
 - b You must not make any derogatory statements about any other person or the Council.
 - c If, in a social media profile, you disclose your association with us, then you should make sure that all postings maintain an appropriate professional style and content.
 - d You must make clear that any opinions given are your personal ones.
 - e You must not publish anything which may bring us, or others associated with us, into disrepute.
 - f You must not publish anything which would be in breach of copyright or the rights of others.
 - g You must not add the details of business contacts you make through work to any of your personal social media accounts.
 - h The contact details of any business contacts you make while working for the business belong to us and must remain confidential. When you leave our employment, you must give us this data and delete any copies you have, including any you have added to your social media accounts.
 - i You must not post to social media other than in your own name, and you must not pretend to be another person, real or non-existent.
- 3.4. Where your actions on social media have a direct or indirect impact on us, then we may take disciplinary action against you.

4. Business use of social media

- 4.1. It is important that if you are posting or commenting on social media as a representative of our business, you behave appropriately and in a way which upholds our values.
- 4.2. ~~[If your duties require you to speak on our behalf on social media, you must seek approval for that communication from [insert appropriate person].~~ If you are contacted for comments about the council for publication, you should contact the Town Clerk for support. Do not respond without written approval.
- 4.3. Any circumstance where you are posting as a proxy for our business (so that the post reads as if it came directly from us) or as our representative, and any post or comment on a platform

where your association with us is visible, is regarded by us as 'business use' of social media and the following rules apply:

- a You should avoid slang.
- b You should avoid inappropriate or rude language.
- c You should only comment on matters which fall within your expertise or knowledge.
- d You should not make any false or misleading statements.
- e You should check spelling and grammar before posting any content online.
- f You should only post on topics which are relevant to the Council.
- g You should never provide references for other individuals on social or professional networking sites. These references, positive and negative, can create legal liability for both you and us.
- h You should not post any confidential or otherwise sensitive information.
- i ~~[If your post is a posting as our representative, you should make sure that any post is approved in advance by [insert appropriate person].]~~

5. Ownership of passwords and contacts¹

- 5.1. **[This paragraph only applies to employees:** [If you have used social media (such as LinkedIn) to store or accrue business contacts in the course of your employment with us, then those contacts belong to us. If we ask you to do any of these things, whether during or after your employment, you must:
 - a Give us your access details to those social media accounts (i.e. your username, password, and any authentication details needed)
 - b Send us a list of all contacts accrued in the course of your employment with us, with all the details we reasonably ask for or irrevocably delete those contacts, without retaining any copies]
- 5.2. We own all passwords to our social media accounts. If you set up a social media account on our behalf, or if you change a password to one of our social media accounts, you must tell The Town Clerk in writing of the (new) access details. If you are set as the contact for two-factor authentication (for example, if a text is sent to your personal phone number to corroborate that you are authorised to sign into a social media account), you must cooperate with us to change those details if we ask you to do so.

6. Monitoring

- 6.1. We may monitor, intercept and review any social media activity carried out using our IT and communications systems as permitted under our *Data Protection Policy* to monitor compliance with this Policy.
- 6.2. We may monitor, intercept and review social media accounts and posts if they are public. We may also review any content or post in a private or 'member only' forum or any deleted post

¹ Both of these requirements need to be reflected in employment contracts in order to be legally binding.

in either a public or private forum which is brought to our attention (for example, by the provision of screenshots).

7. Breaches of this Policy

- 7.1. Breach of this Policy may result in disciplinary action being taken against you, up to and including dismissal.
- 7.2. We may require you to remove social media postings which we believe to be inappropriate or otherwise in breach of this Policy. Failure to comply with any request made may result in disciplinary action being taken against you.

8. Useful links and contacts

- 8.1. The following internal policies contain additional information and guidance [*delete/amend as appropriate*]:
 - a Disciplinary Policy
 - b Computers, Email and Internet Policy
 - c Grievance Policy
 - d Data Protection Policy
- 8.2. Our IT Support can be contacted at any time in relation to the matters detailed in this Policy
- 8.3. If you receive a suspicious email, then please send it to our IT Support for dealing with such issues:

9. Administration of the Social Media Policy

- 9.1. The Town Clerk is responsible for the administration of the Social Media Policy. Should you have any feedback, please contact townclerk@aylsham-tc.gov.uk.