



Date agreed	Committee	Minute number	Renewal date
12 th May 2025	Full Council	9/25.2	May 2026

BUCKINGHAM TOWN COUNCIL FREEDOM OF INFORMATION PUBLICATION SCHEME, DATA PROTECTION ACT 2018

Introduction

The Council's Commitment to the Act

Buckingham Town Council believes in maintaining the transparency of the Council and strives to maintain an open approach to its business.

The Council is committed to openness and accountability and currently makes large amounts of information available to the public through the website, via the telephone, email and by post. Should a personal visit to view information be required, an appointment will be necessary.

The Freedom of Information Act 2000

The Freedom of Information Act grants to members of the public rights of access to all kinds of recorded information held by a wide range of public authorities. Information about the Act is available from the Information Commissioners Officers at [Information Commissioner's Office \(ICO\)](#)

Publication Scheme

The Act requires every public authority to adopt and maintain a generic model publication scheme which should be adopted and operated by all public authorities from 1 January 2009. Buckingham Town Council adopted the generic model scheme on 5 November 2012. This policy is designed to provide everyone with a comprehensive guide to the information that the Council will automatically or routinely publish or otherwise make available to the public.

Freedom of Information Requests and the Publication Scheme

The purpose of this publication scheme is to set out the information that is routinely available. Information that is not listed in the Information Available Guide of this document can still be requested and will be made available unless there is a reason for it to be legitimately withheld. Application for any information not included in the guide below can be made by making a written request to the Compliance and Projects Manager who will reply within 20 working days after receipt of the request.

Model Publication Scheme

This Model Publication Scheme has been prepared and approved by the Information Commissioner. It may be adopted by any public authority without further approval and will be valid until further notice.

This publication commits an authority to make information available to the public as part of its normal business activities. The information covered is included in the classes of information mentioned below, where this information is held by the authority. Additional assistance is provided to the definition of these classes in sector specific guidance manuals issued by the Information Commissioner.

The scheme commits an authority:

1. To proactively publish or otherwise make available as a matter of routine, information, including environmental information, which is held by the authority and falls within the classifications below;
2. To specify the information which is held by the authority and falls within the classifications below;
3. To proactively publish or otherwise make available as a matter of routine, information in line with statements contained within this scheme;
4. To produce and publish the methods by which the specific information is made routinely available so that it can be easily identified and accessed by members of the public;
5. To review and update on a regular basis the information the authority makes available under this scheme.
6. To provide a schedule of any fees charged for access to information which is made proactively available;
7. To make this publication scheme available to the public.

The method by which information published under this scheme will be made available.

1. The authority will indicate clearly to the public what information is covered by this scheme and how it can be obtained.
2. Where it is within the capability of a public authority, information will be provided on a website. Where it is impractical to make information available on a website or when an individual does not wish to access the information by the website, a public authority will indicate how information can be obtained by other means and provide it by those means.
3. In exceptional circumstances some information may be available only by viewing in person. Where this manner is specified, contact details will be provided. An appointment to view the information will be arranged within a reasonable timescale.
4. Information will be provided in the language in which it is held or in such language that is legally required. Where an authority is legally required to translate any information, it will do so.
5. Obligations under disciplinary and discrimination legislation to provide information in other

forms and formats will be adhered to when providing information in accordance with this scheme.

Charges which may be made for information published under this scheme.

The purpose of this scheme is to make the maximum amount of information readily available at minimum inconvenience and cost to the public. Charges made by the authority for routinely published material will be justified and transparent and kept to a minimum.

Material which is published and accessed on a website will be provided free of charge.

Charges may be made for information subject to a charging regime specified by Parliament.

Charges may be made for actual disbursements incurred such as:

- Photocopying
- Postage and packaging
- The costs directly incurred as a result of viewing information

Charges may also be made for information provided under this scheme where they are legally authorised, they are in all the circumstances, including the general principles of the right of access to information held by public authorities, justified, and are in accordance with a published schedule of fees which is readily available to the public.

If a charge is to be made, confirmation of the payment due will be given before the information is provided. Payment may be requested prior to provision of the information.

Written Requests

Information held by a public authority that is not published under this scheme can be requested in writing, when its provision will be considered in accordance with the provisions of the Freedom of Information Act.

Information available from Buckingham Town Council under the Freedom of Information Act Model Publication Scheme.

This template guide covers only information we currently hold. If we do not hold some of the information listed below, we will mark it as 'not held' in the table.

Information to be Published	How the information can be obtained	Cost
Class 1 – Who we are and what we do (Organisational information, structures, locations, and costs) Current information only.	Website Hard Copy	Free 20p per A4 Sheet
List of Council Members and their responsibilities as well as a list of Council Committees	Website Hard Copy	Free 20p per A4 Sheet

Details of any representation on local public bodies		
Postal and email address Contact details for Town Clerk and Council Members Where possible provide named contacts including phone numbers and email addresses	Website Hard Copy	Free 20p per A4 Sheet
Location of Main Council office and accessibility details	Website Hard Copy	Free 20p per A4 Sheet
Staffing Structure	Website Hard Copy	Free 20p per A4 Sheet
Class 2 – What we spend and how we spend it (Financial information about projected and actual income and expenditure, procurement, contracts, and financial audit) Current and previous financial year as a minimum	Website Hard Copy	Free 20p per A4 Sheet
Statement of accounts and internal audit report in the format included in the Annual Return form	Website Hard Copy	Free 20p per A4 Sheet
Finalised Budget	Website Hard Copy	Free 20p per A4 Sheet
Precept	Website Hard Copy	Free 20p per A4 Sheet
Borrowing Approval letter	Website Hard Copy	Free 20p per A4 Sheet
All items of expenditure over £100	Website Hard Copy	Free 20p per A4 sheet
Financial Standing Orders and Regulations	Website Hard Copy	Free 20p per A4 Sheet
Grants given and received	Website Hard Copy	Free 20p per A4 Sheet
List of current contracts awarded and value of contract	Hard Copy	20p per A4 Sheet
Members' allowances and expenses	Website Hard Copy	Free 20p per A4 Sheet
Class 3 – What our priorities are and how we are doing (Strategies and plans, performance indicators, audits, inspections, and reviews) Current and previous years as a minimum	Website Hard Copy	Free 20p per A4 Sheet
Annual governance statement in format included in the Annual Return form	Website Hard Copy	Free 20p per A4 Sheet
Buckingham Plan	Website Hard Copy	Free 20p per A4 Sheet
Annual report to Parish or Community Meeting	Website Hard Copy	Free 20p per A4 Sheet
Quality Status	Not held	

Local Charters drawn up in accordance with DLUHC's guidelines	Hard Copy	20p per A4 Sheet
Data Protection impact assessments (in full or summary format) or any other impact assessment (e.g. Health & Safety Impact Assessment, Equality Impact Assessments etc), as appropriate or relevant	Hard Copy	20p per A4 Sheet
Class 4 – How we make decisions (Decision making process and records of decisions) Current and previous Council year as a minimum	Website Hard Copy	Free 20p per A4 Sheet
Timetable of meetings (Council, and any Committee /Sub Committee meetings and Town meetings)	Website Hard Copy	Free 20p per A4 Sheet

Agendas of meetings (as above)	Website Hard Copy	Free 20p per A4 Sheet
Minutes of meetings (as above) – exclude material that is properly considered to be exempt from disclosure	Website Hard Copy	Free 20p per A4 Sheet
Reports presented to Council meetings – N.B. This will exclude material that is properly considered to be exempt from disclosure	Website Hard Copy	Free 20p per A4 Sheet
Responses to consultation papers	Hard Copy	20p per A4 Sheet
Responses to planning applications	Hard Copy	20p per A4 Sheet
Byelaws	Hard Copy	20p per A4 Sheet
Class 5 – Our policies and Procedures (Current written protocols, policies, and procedures for delivering our services and responsibilities) Current information only	Website Hard Copy	Free 20p per A4 Sheet
Policies and procedures for the conduct of Council business: Procedural Standing Orders Committee and Sub-Committee terms of Reference Delegated authority in respect of officers Code of Conduct Policy Statements	Website Hard Copy	Free 20p per A4 Sheet
Policies and procedures for the provision of services and about the employment of staff: Internal instructions to staff and policies relating to the delivery of services Equality and diversity policy Health and Safety Policy Recruitment policies and details of current vacancies Policies and procedures for handling requests for information Complaints procedures (including those covering requests for information and operating the publication scheme)	Website Hard Copy	Free 20p per A4 Sheet
Records Management, personal data and access to information policies Include information security policies, records retention, destruction and archive policies, and data protection (including data sharing and CCTV usage) policies	Website Hard Copy	Free 20p per A4 Sheet
Class 6 – Lists and Registers Currently maintained lists and registers only	Website Hard Copy Some information	Free 20p per A4 Sheet

	may only be available by Inspection	
Information legally required to hold in publicly available registers (in most circumstances existing access provisions will suffice)	Hard Copy	20p per A4 Sheet
Assets Register, including details of public land and building assets	Website Hard Copy	Free 20p per A4 Sheet
Disclosure log indicating the information provided in response to FOIA and EIR requests. These are recommended as good practice.	Hard Copy	20p per A4 Sheet
Register of Members' interests	Website Hard Copy	Free 20p per A4 Sheet
Register of gifts and hospitality	Website Hard Copy	Free 20p per A4 Sheet
Class 7 – The services we offer Information about the services we offer, including leaflets, guidance and newsletters produced for the public and businesses) Current information only	Website Hard Copy Some information may only be available by inspection	Free 20p per A4 Sheet
Allotments	Not held	
Burial grounds and closed churchyards	Website Hard Copy	Free 20p per A4 Sheet
Community Centres and Village Halls	Website Hard Copy	Free 20p per A4 Sheet
Parks, playing fields and recreational facilities	Website Hard Copy	Free 20p per A4 Sheet
Seating, litter bins, clocks, memorials, and lighting	Hard Copy	20p per A4 Sheet
Bus shelters	Hard Copy	20p per A4 Sheet
Markets	Website Hard Copy	Free 20p per A4 Sheet
Public conveniences	Hard Copy	20p per A4 Sheet
Agency agreements	Hard Copy	20p per A4 Sheet
Services for which we are entitled to recover a fee and details of those fees (e.g., burial fees)	Hard Copy	20p per A4 Sheet
Additional information Information not itemised in the lists above	Upon request by Hard Copy if available	20p per A4 Sheet

Contact details:

Website address: www.buckingham-tc.gov.uk

Email: office@buckingham-tc.gov.uk

Telephone: 01280 816426

SCHEDULE OF CHARGES

This describes how the charges have been arrived at and should be published as part of the guide.

TYPE OF CHARGE	DESCRIPTION	BASIS OF CHARGE
Disbursement cost	Photocopying @ 10p per sheet (black & white)	Actual cost *
	Photocopying @ 20p per sheet (colour)	Actual cost *
	Postage	Actual cost of Royal Mail standard 2 nd class
Statutory Fee		In accordance with the relevant legislation (quote the actual statute)
Other		

* the actual cost incurred.

Requests for hard copies:
 Compliance and Projects Manager
 Buckingham Town Council
 The Buckingham Centre
 Verney Close
 Buckingham
 MK18 1JP

DATA PROTECTION ACT 2018 POLICY

This policy applies to:

- All employees of this Council;
- All regional staff or home workers operating on behalf of this Council.

This policy is operational from 25 May 2018.

The purpose of this policy is to enable the Council to:

- Comply with our legal, regulatory, and corporate governance obligations and good practice
- Gather information as part of investigations by regulatory bodies or in connection with legal proceedings or requests
- Ensure business policies are adhered to (such as policies covering email and internet use)
- Fulfil operational reasons, such as recording transactions, training, and quality control, ensuring the confidentiality of commercially sensitive information, security vetting, credit scoring and checking
- Investigate complaints
- Check references, ensuring safe working practices, monitoring, and managing staff access to systems and facilities and staff absences, administration, and assessments
- Monitor staff conduct, disciplinary matters
- Market our business
- Improve services

This policy applies to information relating to identifiable individuals e.g., staff, applicants, former staff, clients, suppliers, and other third-party contacts.

We will:

- Comply with both the law and good practice
- Respect individuals' rights
- Be open and honest with individuals whose data is held
- Provide training and support for staff who handle personal data, so that they can act confidently and consistently

We recognise that its first priority under the GDPR is to avoid causing harm to individuals. In the main this means:

- Complying with your rights,
- Keeping you informed about the data we hold, why we hold it and what we are doing with it,
- Keeping information securely in the right hands, and
- Holding good quality information.

Secondly, DPA aims to ensure that the legitimate concerns of individuals about the ways in which their data may be used are taken into account. In addition to being open and transparent, we will seek to give individuals as much choice as is possible and reasonable over what data is held and how it is used. This includes the right to erasure where data is no longer necessary and the right to rectification where the data is incorrect. Full details are available in the Privacy Notice issued at the point of gathering the data.

The Council has identified the following potential key risks, which this policy is designed to address:

- Breach of confidentiality (information being given out inappropriately).
- Insufficient clarity about the range of uses to which data will be put — leading to Data Subjects being insufficiently informed
- Failure to offer choice about data use when appropriate
- Breach of security by allowing unauthorised access.
- Failure to establish efficient systems of managing changes, leading to personal data being not up to date.
- Harm to individuals if personal data is not up to date
- Insufficient clarity about the way personal data is being used e.g., given out to general public.
- Failure to offer choices about use of contact details for staff, client's workers, or employees.

In order to address these concerns, to accompany this policy, we have a Privacy Policy, and we will issue Privacy Notices to explain what data we have, why we have it and what we will do with

it. The Privacy Notice will also explain the data subject's rights. We will offer training to staff where this is necessary and appropriate in the circumstances to ensure compliance with DPA. Such training will vary according to the role, responsibilities, and seniority of those being trained.

We aim to keep data only for so long as is necessary which will vary according to the circumstances.

We have no intention to transfer data internationally.

The person responsible for Data Protection is currently Steve Beech with the following responsibilities:

- Briefing Council on Data Protection responsibilities
- Reviewing Data Protection and related policies
- Advising other staff on Data Protection issues
- Ensuring that Data Protection induction and training takes place
- Notification
- Handling subject access requests
- Approving unusual or controversial disclosures of personal data
- Approving contracts with Data Processors
- Ensuring Data is stored securely
- Maintaining a Data Audit and keeping this up to date
- Reporting breaches to the Information Commissioners Office and the relevant Data Subject(s)

Significant breaches of this policy will be handled under the Council's disciplinary procedures which may amount to gross misconduct.

Subject Access Request

Any subject access requests will be handled by the Compliance and Projects Manager.

Subject access requests must be in writing. All staff are required to pass on anything, which might be a subject access request to the Compliance and Projects Manager without delay. The applicant will be given their data within 1 month unless there are complexities in the case which justify extending this by a further 2 months. You will be notified of any extensions to the deadline for response and the reasons as soon as possible.

The Council has the right to refuse a subject access request where data is requested at unreasonable intervals, manifestly unfounded or excessive. You will be notified of the reasons as soon as possible.

Where the individual making a subject access request is not personally known to the Compliance and Projects Manager their identity will be verified before handing over any information.

The required information will be provided in a permanent and portable form unless the applicant

makes a specific request to be given supervised access in person.

You have the right to request the information we hold is rectified if it is inaccurate or incomplete. You should contact the Compliance and Projects Manager and provide with the details of any inaccurate or incomplete data. We will then ensure that this is amended within one month. The Council may, in complex cases, extend this period by a further two months.

You have the right to erasure in the form of deletion or removal of personal data where there is no compelling reason for its continued processing. We have the right to refuse to erase data where this is necessary in the right of freedom of expression and information, to comply with a legal obligation for the performance of a public interest task, exercise of an official authority, for public health purposes in the public interest, for archiving purposes in the public interest, scientific research, historical research, statistical purposes or the exercise or defence of legal claims. You will be advised of the grounds of our refusal should any such request be refused.