



## Establishment Committee

**Date:** MONDAY, 9 APRIL 2018

**Time:** 1.45 pm

**Venue:** COMMITTEE ROOM - 2ND FLOOR WEST WING, GUILDHALL

**Members:** Deputy the Revd Stephen Haines  
(Chairman)  
Deputy Edward Lord (Deputy  
Chairman)  
Randall Anderson  
Sir Mark Boleat  
Deputy Keith Bottomley  
Alderman Peter Estlin  
Deputy Kevin Everett  
Sophie Anne Fernandes  
Deputy Jamie Ingham Clark  
Jeremy Mayhew  
Sylvia Moys  
Deputy Joyce Nash  
Barbara Newman  
Deputy Richard Regan  
Deputy Elizabeth Rogula  
Ruby Sayed  
Deputy Philip Woodhouse

**Enquiries:** Amanda Thompson  
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amanda.thompson@cityoflondon.gov.uk

**Lunch will be served in Guildhall Club at 1pm**  
**NB: Part of this meeting could be the subject of audio or video recording**

**John Barradell**  
**Town Clerk and Chief Executive**

# **AGENDA**

## **Part 1 - Public Agenda**

1. **APOLOGIES**

2. **MEMBERS' DECLARATIONS UNDER THE CODE OF CONDUCT IN RESPECT OF ITEMS ON THE AGENDA**

3. **MINUTES**

To agree the public minutes of the meeting held on 26 February 2018.

**For Decision**  
(Pages 1 - 8)

4. **DATA PROTECTION POLICY**

Report of the Comptroller and City Solicitor.

**For Decision**  
(Pages 9 - 18)

5. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE**

6. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT**

7. **EXCLUSION OF THE PUBLIC**

MOTION - That under Section 100A(4) of the Local Government Act 1972, the public be excluded from the meeting for the following items of business on the grounds that they involve the likely disclosure of exempt information as defined in Part I of Schedule 12A of the Local Government Act.

**For Decision**

## **Part 2 - Non-Public Agenda**

8. **NON-PUBLIC MINUTES**

To agree the non-public minutes of the meeting held on 26 February 2018.

**For Decision**  
(Pages 19 - 20)

9. **NON-PUBLIC QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE**

10. **USE OF PERSONAL EMAIL, RISK AND GDPR COMPLIANCE**  
Joint report of the Comptroller and City Solicitor & Data Protection Officer, the Director of IT and the Director of Information & Chief Security Officer.

**For Decision**  
(Pages 21 - 34)

11. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT AND WHICH THE COMMITTEE AGREES SHOULD BE CONSIDERED WHILST THE PUBLIC ARE EXCLUDED**

**Part 3 - Confidential Agenda**

12. **CONFIDENTIAL MINUTES**  
To agree the confidential minutes of the meeting held on 26 February 2018.

**For Decision**

13. **REWARD STRATEGY**  
Report of the Director of Human Resources.

**For Decision**

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## **ESTABLISHMENT COMMITTEE**

**Monday, 26 February 2018**

**Minutes of the meeting of the Establishment Committee held at the Guildhall EC2 at 1.45 pm**

### **Present**

#### **Members:**

Deputy the Revd Stephen Haines  
(Chairman)  
Deputy Edward Lord (Deputy Chairman)  
Randall Anderson  
Sir Mark Boleat  
Deputy Keith Bottomley  
Alderman Peter Estlin  
Deputy Kevin Everett  
Jeremy Mayhew

Sylvia Moys  
Deputy Joyce Nash  
Barbara Newman  
Deputy Richard Regan  
Deputy Elizabeth Rogula  
Ruby Sayed  
Deputy Philip Woodhouse

#### **Officers:**

John Barradell	-	Town Clerk and Chief Executive
Peter Lisley	-	Assistant Town Clerk (Culture Mile Director)
Simon Latham	-	Town Clerk's Department
Amanda Thompson	-	Town Clerk's Department
Peter Kane	-	Chamberlain
Michael Cogher	-	Comptroller and City Solicitor
Chrissie Morgan	-	Director of Human Resources
Janet Fortune	-	Human Resources Department
Tracey Jansen	-	Human Resources Department
Steve Eddy	-	Barbican Centre
Jonathon Poyner	-	Barbican Centre

#### **1. APOLOGIES**

Apologies for absence were received from Sophie Fernandes and Jamie Ingham Clark.

#### **2. MEMBERS' DECLARATIONS UNDER THE CODE OF CONDUCT IN RESPECT OF ITEMS ON THE AGENDA**

There were no declarations of interest.

#### **3. MINUTES**

**RESOLVED** – That the public minutes and summary of the meeting held on 15 January be approved as an accurate record.

4. **OUTSTANDING ACTIONS REPORT**

The Committee considered a report of the Town Clerk which provided details of outstanding actions from previous meetings.

**RESOLVED** – That the report be noted.

5. **RECRUITMENT OF SENIOR POSTS - NOT CHIEF OFFICER**

The Committee received a report of the Director of Human Resources proposing a process for the recruitment of very senior non Chief Officer posts which were outside of the A – J grading structure, and for which the salary was anticipated to be £100k+.

**RESOLVED** – To approve the proposed process detailed in Appendix 1 for the recruitment of Senior Posts which sit outside of the grading structure, and command a salary in excess of £100K.

All posts within the A – J structure would remain in the recruitment process. New posts within A – J but with salaries over £100K would remain in the currently agreed recruitment process and would have to be agreed by Court of Common Council.

6. **FINAL DEPARTMENTAL BUSINESS PLAN 2018/19**

The Committee received the final high-level business plans for 2018/19 for the Town Clerk's Department (Corporate and Member Services), Corporate HR and the Comptroller & City Solicitor's Department.

**RESOLVED** – That the final high-level business plans for 2018/19 for the Town Clerk's Department (Corporate and Member Services), Corporate HR and the Comptroller & City Solicitor's Department be approved.

7. **GENDER PAY GAPS UPDATE**

The Committee considered a report concerning the CoL's gender pay gap, data for which was required to be published by 30 March 2018 under the new Gender Pay Gap Regulations.

Members raised a number of questions including how the issue of diversity was being actively addressed, why there was a pay gap and whether any trends had been identified during the recruitment process.

The Director of Human Resources reported that the issue of diversity was something that was being addressed during the recruitment stages when attracting candidates to apply and also post recruitment in terms of developing and retaining staff. Recruitment at the CoL at senior levels was now anonymised. There were also various revisions to the recruitment and selection processes as reported to the committee previously. In relation to Gender Pay Gap it was therefore necessary to determine what other factors needed to be solved having looked in more detail at the data.

The Director of Human Resources advised that the Gender Pay Gap measured the differences between the average pay of male and female employees,

irrespective of job role or seniority, and was not to be confused with equal pay which concerned pay differences between male and female employees performing the same or similar work, or work of equal value. It was further noted that the GPG data looked at the total pay but did not reflect the numbers of staff. So whilst useful, more detailed analysis was needed to inform any actions arising.

In response to a question concerning transgender members of staff, the Deputy Chairman advised that this question wasn't asked during the recruitment process, however most transgender people still identified with the gender binary and statistically numbers were very small and unlikely to impact on the wider GPG outcome.

**RESOLVED** - To note the report and endorse the proposed arrangements for Gender Pay Gap reporting in readiness for external publication.

**8. MENTAL HEALTH AND WELLBEING UPDATE**

The Committee received a report concerning the CityWell wellbeing strategy which had helped embed the wellbeing programme at the CoL Corporation.

The Committee noted that mental health training and development was now a mandatory requirement for managers and good progress was being made on the delivery. Initial consultation was also underway on the development of a workplace wellbeing action plan that would support the aims of the new Corporate Plan.

In response to questions concerning whether enough was being done to deal with stress at work, the Director of Human Resources advised that raising awareness was key as well as training managers to recognise the early signs of stress. Work was also being done to reduce the stigma of mental health and supporting people to seek help, and mental health 'first aiders' were also available.

**RESOLVED** – That the report be noted.

**9. FUNDING ARRANGEMENTS FOR MATERNITY, ADOPTION AND SHARED PARENTAL PAY**

The Committee received a report concerning funding options for maternity, adoption and shared parental pay which it had requested following the recent policy change with regards to the increased pay provisions.

Members expressed concern that individual departments were to continue to meet the full costs of the provision, which they felt should be funded by a central budget, and asked that this be reviewed.

The Chamberlain advised that this would require a late adjustment to the budget but agreed to bring a report back to the Committee.

**RESOLVED** - That a report proposing that maternity, adoption and shared parental pay be met from a central budget be brought back to the Committee.

10. **COMPTROLLER AND CITY SOLICITOR'S DEPARTMENTAL RISK MANAGEMENT**

The Committee received a report detailing the Comptroller and City Solicitor's departmental risks as at 30 January 2018.

**RESOLVED** – That the report be noted.

11. **HR DASHBOARD**

The Committee received the Corporate HR Dashboard which highlighted data for the two departments to which the Establishment Committee was the Service Committee - the Town Clerk's Department and the Comptroller and City Solicitor's Department.

The Committee noted that a general trend in the dashboard was a slight increase in headcount with turnover and sickness absence relatively stable.

**RESOLVED** – That the report be noted.

12. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE**

There were no questions.

13. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT**

The following items of urgent business were raised –

SMG Pay and Grading Report

The Committee received a report proposing that the Member consultation arrangements on SMG pay progression be reviewed and consideration be given to the creation of a Remuneration Sub Committee.

Some Members questioned why the report was urgent and suggested that members be given more time to consider the best way forward.

The Deputy Chairman advised that in the light of senior officer salaries being under general public scrutiny, and the fact that the current process had not been reviewed since 2008, it was essential that the CoL had a clear, transparent process that demonstrated good governance.

The Town Clerk advised that should Members want the process to be in place by March then a decision would be needed now.

Members indicated that they supported the proposed process in principle, but would favour a more informal process given that Members were not experts on remuneration and would be reliant on the views of the Town Clerk when considering pay and reward.



The Deputy Chairman suggested that the Committee endorse the proposal to establish a Sub-Committee, and that the terms of reference operate on an trial basis for a year prior to a final decision being made.

**RESOLVED – That**

The Committee approve the establishment of a Senior Management Remuneration Sub-Committee, membership of which would comprise:

- Chairman and Deputy Chairman of Establishment Committee
- Chairman and Deputy Chairman of Policy & Resources Committee
- Chairman of Finance Committee
- Chairman of the General Purposes Committee

**14. EXCLUSION OF THE PUBLIC**

**RESOLVED** – That under Section 100(A) of the Local Government Act 1972, the public be excluded from the meeting for the following items on the grounds that they involve the likely disclosure of exempt information as defined in Part I of the Schedule 12A of the Local Government Act.

**15. NON-PUBLIC MINUTES**

The non-public minutes of the meeting held on 15 January were approved.

**16. OUTSTANDING ACTIONS REPORT**

The Committee noted a report of the Town Clerk which provided details of non-public outstanding actions from previous meetings.

**17. PORT HEALTH & PUBLIC PROTECTION DIVISION CAR USER ALLOWANCES**

The Committee considered and approved a report concerning car allowances in the Port Health and Public Protection Division (PH&PP)

**18. NON-PUBLIC QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE**

There were no questions.

**19. ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT AND WHICH THE COMMITTEE AGREES SHOULD BE CONSIDERED WHILST THE PUBLIC ARE EXCLUDED**

There were no items of urgent business.

**20. CONFIDENTIAL MINUTES**

The confidential minutes of the meeting held on 15 January were approved as a correct record.

**21. STAFFING - GUILDHALL SCHOOL OF MUSIC & DRAMA**

The Committee considered and approved a report of the Managing Director of the Barbican seeking in relation to the payment of a retention allowance.

22. **STAFFING - CITY SURVEYOR'S DEPARTMENT**  
The Committee received and considered a report of the City Surveyor concerning the payment of a market forces supplement
23. **CHAMBERLAIN'S DEPARTMENT - APPROACH TO ORGANISATIONAL REVIEW**  
The Committee received and noted a report of the Chamberlain regarding an organisational review within his department.
24. **CHAMBERLAIN'S - REVIEW**  
The Committee considered and approved a report of the Chamberlain in relation to the Payroll Department.
25. **IT DIVISION - CHAMBERLAIN'S**  
The Committee considered and approved a report of the Chamberlain in relation to the IT Division.
26. **JOINT CONTACT AND CONTROL ROOM (JCCR)**  
The Committee considered a report of the Assistant Town Clerk and Police Commissioner in relation to the Secure City Programme.
27. **BARBICAN CENTRE - IT FUNCTION**  
The Committee considered and approved a report of the Director of the Barbican School of Music and Drama concerning the Barbican IT department.
28. **BARBICAN PROJECTS**  
The Committee considered and approved a report of the Director of Operations and Buildings at the Barbican School of Music and Drama concerning a review of the Projects team.
29. **BRIDGING DIVIDES**  
The Committee received and approved a report of the Town Clerk and Chief Grants Officer concerning the implementation of the 'Bridging Divides' funding strategy.
30. **HOLIDAY PAY AND CONTRACTUAL PAYMENTS**  
The Committee considered and noted a report of the Director of Human Resources concerning holiday pay and non-contractual payments.
31. **REWARD STRATEGY**  
This item was withdrawn.
32. **CONFIDENTIAL STAFFING MATTER**  
The Committee noted and agreed a report of the Town Clerk concerning a staffing matter in the City Bridge Trust department.

33. **BARBICAN SECURITY**

The Committee considered and approved a report of the Director of Operations and Buildings at the Barbican School of Music and Drama concerning a review of the security function at the Barbican Centre.

34. **GUILDHALL SCHOOL OF MUSIC AND DRAMA - STAFFING ISSUE**

The Committee received and considered a report of the Managing Director of the Barbican concerning the payment of a market forces supplement.

**The meeting closed at 4.00 pm**

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Chairman

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<b>Committee(s)</b>	<b>Dated:</b>
Audit and Risk Committee IT Sub Committee Establishment Committee Policy and Resources Committee	6 March 2018 23 March 2018 9 April 2018 12 April 2018
<b>Subject:</b> Data Protection Policy	<b>Public</b>
<b>Report of:</b> Michael Cogher, Comptroller and City Solicitor	<b>For Decision</b>
<b>Report author:</b> Michael Cogher, Comptroller and City Solicitor	

## Summary

This report presents for consideration and adoption a revised Data Protection Policy for the Corporation (excluding the Police) in place of the current policy in preparation for the implementation of the General Data Protection Regulation on 25<sup>th</sup> May this year.

## Recommendation

Members are asked to:

Approve and adopt the revised Data Protection Policy set out in Appendix 1 with effect from 25<sup>th</sup> May 2018.

## Main Report

### Background

1. The current data protection regime is based on an EU Directive from 1995 and implemented in the UK by the Data Protection Act 1998. Since then there have obviously been significant advances in IT and fundamental changes to the ways in which organizations and individuals communicate and share information.
2. As a result, the EU has introduced updated and harmonized data protection regulations known as the General Data Protection Regulation ("GDPR") which is due to come into effect on 25 May 2018.
3. The Corporation is currently reviewing all its relevant policies and procedures to ensure it is compliant with the requirements of GDPR.

## **The Data Protection Policy**

4. The proposed revised policy is set out in Appendix 1.
5. GDPR builds on and strengthens the current data protection requirements and introduces a number of new concepts.
6. The requirement to have a data protection policy arises from the current and strengthened requirements to ensure appropriate technical and organisational measures are in place to ensure the confidentiality, integrity and security of personal data and for greater transparency.
7. The revised Data Protection Policy is designed to be a short and concise overview of the Corporation's commitment to its obligations under GDPR with references to appropriate policies and procedures. It is self-explanatory and is intended to meet accepted good practice in terms of brevity and clarity.
8. It incorporates the revised data protection principles (six down from eight) and references to the expanded rights of data subjects, greater transparency requirements and privacy by design and default.
9. The obsolete current policy which dates from 2001 is set out in Appendix 2 by way of comparison.
10. Once in effect the Policy will be made available on the Website and supported by a brief guide detailing how it is different from the obsolete policy and the implications for users, as defined in the policy. It will be reviewed annually by the Data Protection Officer who will make appropriate recommendations for change (if any) to Committee.

## **Conclusion**

11. The revised Policy is part of the Corporation's commitment to GDPR compliance and is recommended for adoption.

## **Appendices**

Appendix 1 – Proposed Data Protection Policy  
Appendix 2 – Current Data Protection Policy (2001)

## **Background Papers**

None

**Michael Cogher, Comptroller and City Solicitor**

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## City of London Corporation (“the City of London”) Data Protection Policy

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## 1. Introduction

The City of London, PO Box 270, Guildhall, London EC2P 2EJ, is a Data Controller for the purposes of the General Data Protection Regulation (“GDPR”) and the Data Protection Act 2018 (“DPA 2018”). The Data Protection Officer at the City of London is the Comptroller and City Solicitor, Michael Cogher, and can be contacted at the same address or otherwise by email at [michael.cogher@cityoflondon.gov.uk](mailto:michael.cogher@cityoflondon.gov.uk) or [information.officer@cityoflondon.gov.uk](mailto:information.officer@cityoflondon.gov.uk).

This policy outlines how the City of London will comply with its responsibilities under the GDPR and DPA 2018.

## 2. Statement

The City of London is committed to ensuring that it protects the rights and freedoms of all individuals with respect to the personal data it holds about them, whether in their personal or family life, or in a business or professional capacity.

## 3. Scope

This Policy applies to all users who handle information and personal data held by the City of London, including personal data of our service users, from children and young people, to vulnerable adults and the elderly as well as those who provide care for them.

This Policy applies to all employees, Members, contractors, third party employees, agency workers, temporary staff and any third party organisation who has legitimate agreed access to personal data held by City of London. (Please refer to the full Employee Data Protection Policy for full guidance for employees).

## 4. Definitions

**Personal Data** - data/information that relates to a living individual who can be identified from the data or from any other information that is in the possession of, or likely to come into the possession of the data controller. It includes any expression of opinion and any indication of the intentions of the data controller (or any other person) in respect of the individual.

**Data Controller** - the person or organisation who determines the purposes for which and the manner in which any personal data are, or are to be, processed. The City of London is the data controller in respect of all personal information that relates to City of London business. Elected Members are data controllers in their own right where they process personal data in their capacity as ward representatives.

**Data Subject** - is the identified or identifiable person to whom the personal data relates.

**Processing** - is defined very broadly and encompasses collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination,



restriction (that is, the marking of stored data with the aim of limiting its processing in the future, erasure and destruction. In effect, any activity involving personal data falls within the scope of the GDPR.

**Data Processor** - the person or organisation who processes personal data on behalf of a data controller.

## 5. Six Data Protection Principles

The City of London has an obligation to comply with the six Data Protection principles when processing personal data. These principles require that personal data:

1. Shall be processed lawfully, fairly and in a transparent manner in relation to the data subject.
2. Shall be collected only for specified, explicit and legitimate purposes. It must not be further processed in any manner incompatible with those purposes.
3. Shall be adequate, relevant and limited to what is necessary in relation to the purposes for which it is processed.
4. Shall be accurate and, where necessary, kept up to date. Every reasonable step must be taken to ensure that data which is inaccurate, having regard to the purposes for which it is processed, is erased or rectified without delay.
5. Shall not be kept in a form which permits identification of data subjects for longer than is necessary for the purposes for which the data is processed. Personal data may be stored for longer periods provided it is processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes. This is subject to the implementation of appropriate data security measures designed to safeguard the rights and freedoms of data subjects.
6. Shall be processed in a manner that ensures its appropriate security. This includes protection against unauthorised or unlawful processing and against accidental loss, destruction or damage.

The City of London will ensure that it is able to demonstrate compliance with all of the above six principles by:

- Following best practice in all personal data processing;
- adhering to the relevant processing conditions for the fair and lawful processing of personal data and special categories of personal data (set out on page 4);
- telling people why we are processing their personal data and who we will share their personal data with, through our clear and effective privacy notices;
- ensuring that if relying on consent from the data subject, it is freely given, specific, informed and unambiguous;
- implementing "privacy by default" measures to ensure that, by default, we only process the personal data necessary for each specific business purpose;

- ensuring all staff and people working for the City of London complete the mandatory Data Protection e-learning course as part of their induction and any subsequent refresher training;
- ensuring the Records of Processing Activities (“ROPA”) is reviewed annually and kept up to date;
- ensuring a robust personal data breach detection, investigation and internal reporting procedure is in place;
- ensuring transfer of personal data outside of the EEA is only carried out with a valid adequacy mechanism legitimising such a transfer;
- ensuring personal data is only kept for as long as necessary in accordance with the retention schedules.

## 6. Data Processing Conditions

The City of London will ensure that it processes personal data lawfully. Processing is lawful under Article 6 of the GDPR if one of the following applies:

- a) The data subject consents to the processing;
- b) the processing is necessary for performing a contract with the data subject;
- c) the processing is necessary for complying with a legal obligation;
- d) the processing is necessary for protecting the vital interests of the data subject;
- e) the processing is necessary for performing a task carried out in the public interest; or
- f) the processing is necessary for pursuing the legitimate interests of the data controller or a third party, except where the data subject's interests or fundamental rights and freedoms override the data controller's interests.

## 7. Data Subject Rights

The GDPR provides data subjects with several rights, including, but not limited to the right to:

- Be provided with a privacy notice containing certain information about the processing activities;
- Confirm whether the data controller processes personal data about the data subject and the right to access the personal data processed and obtain certain information about the processing activities (**Subject Access**);
- Correct inaccurate personal data (**Rectification**);
- Have personal data erased under certain circumstances (**Erasure**);
- Restrict the processing of personal data under certain circumstances (**Restriction**);
- Receive a copy of the personal data the data controller holds under certain circumstances and transfer the personal data to another data controller (**Data Portability**);
- Object to processing of personal data (**Right to Object**);

- Not be subject to a decision based solely on automated processing, including profiling **(Automated Decisions)**.

Data subjects can exercise these rights by contacting the Information Compliance Team at [information.officer@cityoflondon.gov.uk](mailto:information.officer@cityoflondon.gov.uk) or the Data Protection Officer. Please refer to the full Data Subject Rights' Policy for further details.

## **8. Related Policies / Other Resources**

- Employee Data Protection Policy
- Information Security Policy
- Data Subject Rights
- Retention Policy/Schedules
- Employee Code of Conduct
- Communications and Information Systems Use Policy
- Pupil and Parent Data Protection Policy
- Information Commissioner's Office
- General Data Protection Regulation
- Data Protection Act 2018

## **9. Review**

This policy will be reviewed at least annually or whenever legal or statutory changes demand, by the City of London's Data Protection Officer.

Draft: 1 February 2018

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## **Corporation of London Data Protection Policy**

This is a statement of the Data Protection policy adopted by Corporation of London to cover its obligations under the 1998 Data Protection Act.

The Corporation of London needs to collect and use certain types of information about people with whom it deals with in order to operate. These include current, past and prospective employees, suppliers, clients/customers, residents, tenants and others with whom it communicates. In addition, it may occasionally be required by law to collect and use certain types of information of this kind to comply with the requirements of government departments for business data, for example. This personal information must be dealt with properly however it is collected, recorded and used – whether on paper, in a computer, or recorded on other material – and there are safeguards to ensure this in the Data Protection Act 1998.

We regard the lawful and correct treatment of personal information by Corporation of London as very important to successful operations, and to maintain confidence between those with whom we deal and ourselves. We ensure that our organisation treats personal information lawfully and correctly.

To this end we fully endorse and adhere to the Principles of Data Protection, as enumerated in the Data Protection Act 1998.

Specifically, the Principles require that personal information:

- Shall be processed fairly and lawfully and, in particular, shall not be processed unless specific conditions are met;
- Shall be obtained only for one or more specified and lawful purposes, and shall not be further processed in any manner incompatible with that purpose or those purposes;
- Shall be adequate , relevant and not excessive in relation to the purpose or purposes for which they are processed;
- Shall be accurate and, where necessary, kept up to date;
- Shall not be kept for longer than is necessary for that purpose or purposes;
- Shall be processed in accordance with the rights of data subjects under the Act;
- Appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data;
- Shall not be transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedom of data subjects in relation to the processing of personal data.

Therefore, Corporation of London will, through appropriate management, strict application of criteria and controls:

- Observe fully conditions regarding the fair collection and use of information;

- Meet its legal obligations to specify the purposes for which information is used;
- Collect and processes appropriate information, and only to the extent that it is needed to fulfil operational needs or to comply with any legal requirements;
- Ensure the quality of information used;
- Apply strict checks to determine the length of time information is held;
- Ensure that the rights of people about whom information is held, can be fully exercised under the Act. (These include: the right to be informed that processing is being undertaken, the right of access to one's personal information, the right to prevent processing in certain circumstances and the right to correct rectify, block or erase information which is regarded as wrong information);
- Take appropriate technical and organisational security measures to safeguard personal information;
- Ensure that personal information is not transferred abroad without suitable safeguards.

**In addition, the Corporation of London will endeavour to ensure that:**

- There is someone with specific responsibility for Data Protection in the organisation. (Currently, the Nominated Person is the IS Division Security Officer);
- Everyone managing and handling personal information understands that they are contractually responsible for following good data protection practice;
- Everyone managing and handling personal information is appropriately trained to do so;
- Everyone managing and handling personal information is appropriately supervised;
- Anybody wanting to make enquires about handling personal information knows what to do;
- Queries about handling personal information are promptly and courteously dealt with;
- Methods of handling personal information are clearly described;
- A regular review and audit is made of the way personal information is managed;
- Methods of handling personal information are regularly assessed and evaluated.
- Performance with handling personal information is regularly assessed and evaluated.

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of the Local Government Act 1972.

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