Agenda Item 3 a)

Budget Monitoring Report - Income & Expenditure Account
Quarter ending 30th September 2026

Summary

At the end of the 2nd quarter the Council's revenue account is showing a positive variance of £91.7k against budget.

Service	Q2			Annual	
	Net Expenditure	Budgeted Net Expenditure	Variance Year to Date	Budgeted Net Expenditure	Forecast Out-turn
Car Parks	(660,818)	(624,793)	(36,025)	(689,895)	(725,667)
Management Account - Co-operative Car Park	(12,508)	(12,250)	(258)	(24,500)	(24,758)
Boat Park	(44,992)	(41,661)	(3,331)	(39,730)	(42,984)
Public Conveniences	96,065	92,205	3,860	176,975	180,835
Burlington Chine Beach Chalets Mgt A/c	0	0	0	(155)	(155)
Cemeteries	(16,145)	(9,923)	(6,222)	(20,745)	(26,967)
Parks and Operations	350,015	350,631	(616)	773,600	733,747
King George's Field Trust-Management A/c	(11,500)	(22,250)	10,750	(15,000)	(3,957)
CCTV System & Control Centre	1,545	2,000	(455)	4,500	4,045
Beach Gardens	(20,798)	(27,071)	6,273	(12,490)	(5,511)
The Downs/Other Grounds and Gardens	(18,988)	(7,732)	(11,256)	(8,275)	(19,531)
Beaches and Foreshore	82,506	82,693	(187)	103,685	112,932
Beach Bungalows	(153,059)	(151,414)	(1,645)	(130,580)	(134,514)
Publicity & Information Centre	132,511	141,139	(8,628)	288,565	275,308
Allotments	(1,174)	(975)	(199)	(2,575)	(2,774)
General Buildings	(13,489)	(30,378)	16,889	(51,655)	50,633
Central Services & Corporate Management	284,351	313,897	(29,546)	594,580	549,300
Members & Civic Costs	4,186	4,230	(44)	20,650	20,606
Grants/Donations/Third Party Contributions	26,263	32,125	(5,862)	85,890	75,140
Net Cost of Services	23,971	90,473	(66,502)	1,052,845	1,015,728
Non-Service Expenditure					
Community Infrastructure Levy	(13,445)	0	(13,445)	0	(13,445)
Precept on Dorset Council	(1,159,000)	(1,159,000)	0	(1,159,000)	(1,159,000)
Interest and investment income	(146,765)	(110,000)	(36,765)	(220,000)	(280,000)
Net Operating expenditure	(1,295,239)	(1,178,527)	(116,712)	(326,155)	(436,717)
Other Movements on the General Fund					
Appropriation to Reserves	24,945	0	24,945	179,670	292,775
Appropriation from Reserves	0	0	0	0	0
Financing Capital Expenditure	67,691	67,691	0	140,000	140,000
(Surplus)/Deficit for the Period	(1,202,603)	(1,110,836)	(91,767)	(6,485)	(3,942)

Car Parks

Car parking realised a net surplus of £660.8k for the period against a budgeted surplus of £624.8k, a negative variance of £36k.

	Q2			Annual	
	Actual	**Budget**	**Variance**	**Budget**	**Forecast Outturn - Q1**
	£	**£**	**£**	**£**	**£**
Employee Costs	31,348	31,890	(542)	60,480	60,190
Expenditure	123,591	120,467	3,124	197,900	201,025
Income	(815,757)	(777,150)	(38,607)	(948,275)	(986,882)
Net Expenditure	(660,818)	(624,793)	(36,025)	(689,895)	(725,667)

As shown in the summary above, income is £38.6k above budget overall at the end of the 1st half of the year, with car park income variances of +£14.9k, Main Beach and +£8.3k Broad Road. +£11.1k relates to EVCP electricity, pending revised provision, with an expenditure offset. ECN income is £4.8k above budget.

Table 1: Long Stay Car Parks Net Revenue and Usage (data from ASLAN/Flowbird Web Office/JustPark)

	Main Beach		North Beach		Broad Road		Total	
	Usage	**Net revenue**	**Usage**	**Net revenue**	**Usage**	**Net revenue**	**Usage**	**Net revenue**
2024/25								
April	5,493	£21,998	227	£757	6,024	£22,305	11,744	£45,059
May	8,987	£38,488	752	£2,824	8,375	£34,543	18,114	£75,854
June	9,103	£40,949	881	£3,420	8,698	£35,520	18,682	£79,889
July	10,613	£54,912	1513	£6,294	9,746	£45,559	21,872	£106,766
August	15,101	£79,178	2605	£10,674	14,022	£66,950	31,728	£156,803
September	7,427	£32,655	550	£1,936	7,160	£29,730	15,137	£64,321
H1 Total	**56,724**	**£268,180**	**6,528**	**£25,905**	**54,025**	**£234,607**	**117,277**	**£528,692**
2025/26								
April	7,737	£36,341	399	£1,486	7,419	£32,180	15,555	£70,007
May	9,398	£46,548	751	£2,816	8,396	£37,810	18,545	£87,173
June	9,172	£45,559	919	£3,483	7,798	£35,037	17,889	£84,078
July	12,090	£62,849	2046	£8,452	10,222	£47,805	24,358	£119,107
August	14,966	£78,646	2701	£11,170	13,808	£64,449	31,475	£154,265
September	7,083	£34,789	504	£1,815	6,564	£29,158	14,151	£65,763
H1 Total	**60,446**	**£304,732**	**7,320**	**£29,223**	**54,207**	**£246,439**	**121,973**	**£580,393**
2026/27								
April	7,168	£36,306	335	£1,541	6,525	£30,385	14,028	£68,233
May	9,206	£51,830	1071	£6,418	8,481	£42,770	18,758	£101,018
June	7,973	£44,134	717	£4,021	7,623	£36,815	16,313	£84,970
July	13,033	£76,577	2194	£12,770	11,179	£57,964	26,406	£147,311

August	15,428	£89,136	2136	£12,777	14,023	£71,572	31,587	£173,485
September	7,605	£42,587	470	£2,388	7,539	£37,764	15,614	£82,738
H1 Total	**60,413**	**£340,570**	**6,923**	**£39,915**	**55,370**	**£277,271**	**122,706**	**£657,755**

Table 1, above, compares long-stay car park usage and revenue for the first half of 2026/27 with the same periods in the preceding two financial years. Compared with 2025/26, visitor numbers were broadly unchanged, while revenue increased by 13%. Compared with 2024/25, visitor numbers increased by 4.6% and revenue increased by 24%. These results demonstrate the effect of the changes made to long-stay tariffs and the tariff structure in 2026.

Following on from the Q1 report, the purchase distribution % of tickets has been given in table2 below.

Table 2: % distribution of standard tariff purchases – Apr – Sept

	Tariff						
Period	**1 Hour**	**2 hours**	**3 hours**	**4 hours**	**5/6 hours**	**13 hours**	**3 & 7 day**
H1 25/26	15.00%	34.00%	0.00%	27.50%	16.00%	7.00%	0.50%
H1 26/27	16.00%	26.00%	23.50%	15.00%	8.00%	11.00%	0.50%
YOY Movement	**1.00%**	**-8.00%**	**23.50%**	**-12.50%**	**-8.00%**	**4.00%**	**0.00%**
Estimate	16.00%	26.00%	16.00%	21.00%	15.00%	5.50%	0.50%

There has continued to be a greater number of 3 hour parking sessions and fewer 4 hour tickets purchased than the figures used for budget setting. A higher uptake has also been seen in the 13 hour tariff with the 5 hour ticket lower than prior year (revised to 5 hours from a 6 hour tariff in 25/26).

Employee costs and expenditure are generally in line with budget overall. There are some variances, such as electricity and repairs and maintenance costs with variances of +£6 and -£5.2k respectively.

Projecting forward to year-end, a surplus of £725k is anticipated against a budgeted surplus of £689k.

Boat Park & Fishers' Huts

	Q2			Annual	
	Actual	**Budget**	**Variance**	**Budget**	**Forecast Outturn - Q2**
	£	**£**	**£**	**£**	**£**
Employee Costs	17,943	18,090	(147)	19,940	19,870
Expenditure	9,890	12,089	(2,199)	20,010	17,811
Income	(72,825)	(71,840)	(985)	(79,680)	(80,665)
Net Expenditure	(44,992)	(41,661)	(3,331)	(39,730)	(42,984)

Income and expenditure for the boat park have largely been as per budget for the 2nd quarter, with only small variances across multiple budget lines.

The year-end forecast shows an outturn of a surplus of £43k against a budgeted surplus of £39.7k.

Public Conveniences

	Q2			Annual	
	Actual	Budget	Variance	Budget	Forecast Outturn - Q2
	£	£	£	£	£
Expenditure	100,121	95,480	4,641	183,400	188,041
Income	(4,056)	(3,275)	(781)	(6,425)	(7,206)
Net Expenditure	96,065	92,205	3,860	176,975	180,835

Expenditure is £4.6k over budget year to date and this mainly relates to an underspend in the repairs and maintenance budget being offset by an overspend in utilities.

As reported in Q1, it is proving challenging to monitor actual water consumption against invoiced usage in a timely manner, with numerous invoices and credit notes being applied each month.

Cemeteries

	Q2			Annual	
	Actual	Budget	Variance	Budget	Forecast Outturn – Q2
	£	£	£	£	£
Expenditure	7,370	7,767	(397)	14,195	13,798
Income	(23,515)	(17,690)	(5,825)	(34,940)	(40,765)
Net Expenditure	(16,145)	(9,923)	(6,222)	(20,745)	(26,967)

Small variances have been seen in in some expenditure lines, but there are no significant variances to report.

Income is £5.8k above budget year to date, but as ever this is a demand driven revenue source and variances, both positive and negative are usual.

Parks & Operations

	Q2			Annual	
	Actual	Budget	Variance	Budget	Forecast Outturn – Q2
	£	£	£	£	£
Employee Costs	290,392	289,110	1,282	595,180	594,500
Expenditure	146,552	139,721	6,831	311,470	280,140
Income	(86,928)	(78,200)	(8,728)	(133,050)	(140,893)
Net Expenditure	350,015	350,631	(616)	773,600	733,747

At the end of the 1st half of the year, the Parks & Operations department net expenditure is £0.6k under budget.

Income is £8.7k over budget, and is primarily due to a £3k contribution from Barratts for the installation of a new pathway, and settlement of the Vodafone lease renewal.

Overall expenditure is £6.8k above budget at the end of the period. The significant variances were reported in Q1, being expenditure on catenary for the festive lights and emergency repairs to a tractor.

A budget of £60,000 was allowed for expenditure on the sports hall at Day's park. However, a grant of £21,840 has been approved for the Football Club in lieu of direct payment for repair works. A vire of £21,840 has been transacted to the grants budget. The balance of £38,160 will be transferred to an EMR pending agreement on the expenditure.

A small variance in employee costs has been realised.

Beach Gardens

	Q2			Annual	
	Actual	**Budget**	**Variance**	**Budget**	**Forecast Outturn – Q2**
	£	**£**	**£**	**£**	**£**
Employee Costs	28,917	28,410	507	35,730	36,860
Expenditure	29,414	29,544	(130)	45,240	45,110
Income	(79,129)	(85,025)	5,896	(93,460)	(87,481)
Net Expenditure	(20,798)	(27,071)	6,273	(12,490)	(5,511)

Expenditure and employee costs are generally as per budget, with a few insignificant variances. Sports equipment purchases are over budget by £3.7k, following the approval of additional expenditure of £4.75k for the repurposing of court 6 for Pickleball.

Income is £5.8k under budget, being mainly across tennis -£1.2k and putting -£3.5k.

Downs/Miscellaneous Grounds

	Q2			Annual	
	Actual	**Budget**	**Variance**	**Budget**	**Forecast Outturn – Q2**
	£	**£**	**£**	**£**	**£**
Expenditure	10,843	2,738	8,105	5,475	13,580
Income	(29,831)	(10,470)	(19,361)	(13,750)	(33,111)
Net Expenditure	(18,988)	(7,732)	(11,256)	(8,275)	(19,531)

The variance in net expenditure of £11k is due to back rent following the conclusion of a rent review with the RNLI.

The variance in expenditure is due to repairs that were carried out on Broad Road following an accident. This is offset by repayment through an insurance claim.

Beaches & Foreshore

	Q2			Annual	
	Actual	**Budget**	**Variance**	**Budget**	**Forecast Outturn – Q2**
	£	**£**	**£**	**£**	**£**
Employee Costs	37,593	41,200	(3,607)	52,070	48,260
Expenditure	81,464	75,308	6,156	85,430	101,223
Income	(36,551)	(33,815)	(2,736)	(33,815)	(36,551)
Net Expenditure	82,506	82,693	(187)	103,685	112,932

At the end of the 2nd quarter net expenditure is largely as per budget.

Income year to date is £2.7k above budget. This is due to a repayment of £2.7k from HMRC as reported in Q1.

Expenditure is over budget with a £6.1k variance. Seaweed removal is £10.4k over budget, with £27.4k spent to date. At the Council meeting held 22nd June 2026, Minute 45 (a) it was agreed that a £10k budget to develop the Beach Access vision be approved and is included in the year-end outturn figures.

Employee costs are under budget, with fewer hours used for the seasonal beach warden posts.

Overall, a revised year-end outturn of a net deficit of £112k against a budget of £103k is being projected.

Beach Huts

	Q2			Annual	
	Actual	**Budget**	**Variance**	**Budget**	**Forecast Outturn – Q2**
	£	**£**	**£**	**£**	**£**
Employee Costs	565	0	565	0	565
Expenditure	36,291	47,126	(10,836)	78,870	65,745
Income	(189,914)	(198,540)	8,626	(209,450)	(200,824)
Net Expenditure	(153,059)	(151,414)	(1,645)	(130,580)	(134,514)

Beach hut income is £8.6k under budget at the end of the quarter, with Shore Road -£5.8k and Spa Retreats -£2.7k from budget.

Expenditure is £10.8k under budget, a combination of NNDR -£3.4k and Cleaning Services -£5.2k.

Employee costs have been added due to the cleaning being brought in-house for the summer season.

Publicity & Tourism

	Q2			Annual	
	Actual	Budget	Variance	Budget	Forecast Outturn – Q2
	£	£	£	£	£
Employee Costs	120,609	120,375	234	242,840	238,445
Expenditure	36,296	44,469	(8,173)	79,710	71,537
Income	(24,395)	(23,705)	(690)	(33,985)	(34,675)
Net Expenditure	132,511	141,139	(8,628)	288,565	275,308

At the end of the 1st quarter a positive variance of £8.6k has been realised.

Income is generally as per budget, with a positive variance in total.

Although expenditure is showing a positive variance, this is the total over many budget lines with small variances, the largest variance being stock purchases at -£2.5k.

Employee costs are marginally over budget ytd. However, a variance is anticipated by year-end due to an upcoming vacancy. The forecast is anticipating a new employee being in post in January. Any delays will see this underspend greaten.

Allotments

	Q2			Annual	
	Actual	Budget	Variance	Budget	Forecast Outturn – Q2
	£	£	£	£	£
Expenditure	3,678	3,725	(47)	7,175	7,128
Income	(4,851)	(4,700)	(151)	(9,750)	(9,901)
Net Expenditure	(1,174)	(975)	(199)	(2,575)	(2,774)

To date allotments have performed largely as per budget, with very little activity to report.

General Buildings/Misc Areas (incl roads)

	Q2			Annual	
	Actual	Budget	Variance	Budget	Forecast Outturn – Q2
	£	£	£	£	£
Expenditure	21,389	4,500	16,889	26,500	128,788
Income	(34,878)	(34,878)	0	(78,155)	(78,155)
Net Expenditure	(13,489)	(30,378)	16,889	(51,655)	50,633

Expenditure is £15.9k over budget at the end of the 1st half of the year. As reported in Q1, £11k was approved as emergency expenditure in relation to a collapsed drain at Prospect Green (reported

Minute no. 235, 27 April 2026). A further £7.5k of expenditure was incurred for repairs to the Parade railings, Minute 216 (f).

Appendix A ref: 2 refers to repairs to the surface of Panorama Road. A budget of £20k was allowed for this project. However, quotes exceeded budget and approval of expenditure of £30k was approved by Council in September 2026.

Provision has been made in the forecast outturn figures for estimated expenditure of c. £75k as a contribution towards the rebuilding of a boundary wall in Marsh Way, Appendix A ref: AD5 refers.

A forecast deficit for the year of £50.6k is now being forecast against a budgeted surplus of £51.6k a variance of £102k.

Central Services & Corporate Management

	Q2			Annual	
	Actual	**Budget**	**Variance**	**Budget**	**Forecast Outturn – Q2**
	£	**£**	**£**	**£**	**£**
Employee Costs	198,204	216,050	(17,846)	432,100	398,520
Expenditure	99,968	103,697	(3,729)	183,330	179,601
Income	(13,821)	(5,850)	(7,971)	(20,850)	(28,821)
Net Expenditure	284,351	313,897	(29,546)	594,580	549,300

At the end of Q2 net expenditure is £29.5k under budget, with several variances underlying this figure.

Income is £7.9k over budget, and this relates to the recharge of legal fees following the resolution of the Vodafone lease renewal at Day' s Park.

The largest variance relates to legal and professional fees being £4k over budget, with total expenditure £3.7k under budget. This is an accumulation of small variances over many budget lines.

Employee costs are under budget due to reduced hours and a vacancy in H1. A further post will become vacant during Q3. The outturn assumes full employment in January 2027.

Members and Civic Costs

	Q2			Annual	
	Actual	**Budget**	**Variance**	**Budget**	**Forecast Outturn – Q2**
	£	**£**	**£**	**£**	**£**
Net Expenditure	4,186	4,230	(44)	20,650	20,606

Expenditure is largely on budget at the end of Q2.

Grants & Donations

	Q2			Annual	
	Actual	Budget	Variance	Budget	Forecast Outturn – Q2
	£	£	£	£	£
Expenditure	26,263	32,125	(5,862)	85,890	75,140

Expenditure is under budget year to date. The main contributor to this variance is the agreement to issue a grant of £7.5k in the current year to Cultural Purbeck, whereas a budget of £15k had originally been provided. This will now be paid over a 3 year period.

Following the conclusion of negotiations with Vodafone, a revised annual rental of £3k per annum was agreed, a reduction of £2.25k. As such, and in line with the agreement with Council, £4.1k (up to 30/04/2027) was paid as a grant the Swanage & Herston Football Club.

A budget of £60k was included in the 2026/27 estimates for works to the football club buildings (see Parks & Operations). Given further discussions, it was agreed that a grant of £21,840 would be issued to the football club for costs incurred for remedial works, Appendix A ref: 4) and is included in the year-end forecast. The balance of the budgeted £60k will be transferred to an EMR (see section on EMR).

Note: Vire of £21,840 from Day's Park to grants.

King George's Management Account

	Q2			Annual	
	Actual	Budget	Variance	Budget	Forecast Outturn Q2
	£	£	£	£	£
Employee Costs	4,207	1,500	2,707	3,000	6,000
Expenditure	8,079	8,750	(671)	14,500	13,829
Income	(23,786)	(32,500)	8,714	(32,500)	(23,786)
Net Expenditure	(11,500)	(22,250)	10,750	(15,000)	(3,957)

In contrast to the council's car parks, income from overflow car parking is £12.7k below budget, with income from event parking/administration £4k above budget. Employee costs have been recharged from Parks & Operations. The surplus of £11.5k has been appropriated to the earmarked reserve and adjustments will continue to be made at the end of each quarter.

Employee Costs

	Q2			Annual	
	Actual	Budget	Variance	Budget	Forecast Outturn – Q2
	£	£	£	£	£
Car Parks	28,430	28,380	50	53,460	53,470
Market-CSA	2,919	3,510	(591)	7,020	6,720
Boat Park	17,943	18,090	(147)	19,940	19,870
Parks & Operations	294,599	290,610	3,989	598,180	600,500
Beaches - Cleaner	28,001	27,870	131	38,740	38,930
Beaches - Warden	9,592	13,330	(3,738)	13,330	9,330
Beach Gardens	28,917	28,410	507	35,730	36,860
Tourism	121,174	120,375	799	242,840	239,575
Central Services	198,204	216,050	(17,846)	432,100	398,520
Total	729,779	746,625	(16,846)	1,441,340	1,403,210

At the end of the 1st half of the year a positive variance of £16.8k was realised in total. A pay award of 3.3% was agreed in August and paid in September. A budget of 3% was incorporated into the estimates so there are some small variances on settlement.

Presently, a year-end positive variance of £38k is forecast. This is due to current and future vacancies in Central Services and Visitor Services.

Interest & Investment Income

	Q2			Annual	
	Actual	Budget	Variance	Budget	Forecast Outturn – Q2
	£	£	£	£	£
Net Expenditure	(146,765)	(110,000)	(36,765)	(220,000)	(280,000)

Investment interest in the first half of the year is significantly above budget, £36.7k.

It is usual that variances will occur from budget with fluctuations due to interest rates from those assumed at budget setting. New deposits are expected to be in the region of 3.9% - 4.25% as we see rates starting to increase given assumed increases in bank rate.

As the start of the Green Seafront Scheme draws nearer, during the second half of the financial year consideration will need to be given to the timings of the redemption of units in the Council's long term investments.

A Treasury Report for the 1st half of the financial year (H1) has been issued separately.

Revenue Account - General Overview

At the end of the 1st half of the council's financial year, net expenditure is £91.7k under budget.

The main contributors to this variance are: +£38k in employee costs, +£36.7k variance from investment income, +£36k variance in car parks, +£11k general areas and -£16k general buildings.

Presently, a surplus on the general fund of £3.9k is forecast at year-end, against a budgeted surplus of £6.4k. The forecast includes supplementary expenditure of c. £75k for a contribution towards the rebuild of a boundary wall. Additionally, contributions to reserves are forecast to exceed budget, with £38k being transferred for the Football Club, pending approval, and an estimated £60k of surplus treasury income to be transferred to EMR.

Reserves and Balances held 30th September 2026

A summary of the reserves and balances held at 30th September 2026 is given below:

	Balance 31/03/2026 £	Movement in Year £	Balance 30/09/2026 £
General Fund	738,756	1,202,603	1,941,359
Earmarked Reserves	3,469,349	24,945	3,494,294
Capital Receipts Reserve	1,889,216	0	1,889,216
Total	**6,097,321**	**1,227,548**	**7,324,869**

Detailed movements on the General Fund are shown on page 1 of the Budget Report.

Earmarked Reserves

The Council holds the following earmarked reserves:

	Balance 31/03/2026 £	Transfer to/(from) reserve £	Balance 30/09/2026 £
Beach Huts Reserve	10,000	0	10,000
Environmental Projects Reserve	92,000	0	92,000
Community Infrastructure Levy	390,021	13,445	403,466
De Moulham Back Roads	28,664	0	28,664
Treasury Risk Management Reserve	214,132	0	214,132
Car Park Machines	9,811	0	9,811
Play Equipment-General Areas	51,406	0	51,406
Vehicle & Plant Replacement	40,000	0	40,000
Tennis Courts Refurbishment	19,944	0	19,944
Public Conveniences	15,000	0	15,000
IT Equipment Reserves	20,264	0	20,264
Green Seafront Scheme	1,850,000	0	1,850,000
Community Sea Defence Project	450,000	0	450,000
King George's Field Management Account	68,144	11,500	79,644
Bandstand	9,888	0	9,888
Asset Management Plan Reserve	175,000	0	175,000
Boat Park/Fishers Huts Reserve	20,000	0	20,000
Grants Reserve	5,075	0	5,075
Day's Park Sports Facility *	0	0	0
Total	**3,469,349**	**22,495**	**3,494,294**

*At the Council meeting held 29 January 2024, Minute 181, Council committed £220,000 to the funding of a community sports facility at Day's Park. Since then, £40,836 has been spent to date which leaves a balance of £179,164 in unspent committed funds outstanding. A grant of £21,840 has been approved in the current financial year.

In order to separately identify the committed expenditure, Members are asked to consider the establishment of a Day's Park Sports Facility EMR, so that the committed funds can be separately identified. Initially, financing was committed from UCRR, however, this cannot be transferred to an EMR. Therefore, it is suggested that at year-end when the balance of unspent funds is known, as well as the balance on the general reserve, that financing of the capital programme is redistributed and funds transferred to the new EMR.

Decision required: To approve a Day's Park Sports Facility Reserve and transfer unspent and committed funds to the reserve at year-end.

Appendix A

Significant (> £5k) One Off Revenue Expenditure/Minor Works – 2026/27

Ref	Item/location	Description of Works	Budget £	Actual Expenditure to date	Works programmed	Update
1	Town Hall	Insulation	5,000	-	Jan-27	Project cancelled
2	Panorama Road	Surface repairs	20,000	-	Nov-26	Budget approval up to £30k - Minute 910(a) Council meeting 14 September 2026
3	Days Park	Pathway repairs	5,000	-	Oct-26	
4	Days Park	Football Club - Asbestos Removal	60,000	-	Q3	Grant of £21,840 approved Minute 72 (b) Council Meeting 5 August 2026
5	Beaches & Foreshore	Signage	10,000	10,489	May-26	Contract of £12k approved 27 April 2026
			100,000	**10,489**		

Supplementary Budgets 26/27

AD1	Festive Lights	Catenary Wire - Installation and Rental yr1	15,895	15,892	Q1	Agreed - Minute 216 (a) Council Meeting 23 March 2026
AD2	Parade Railings	Railing Repairs	7,500	7,500	Q1	Agreed - Minute 216 (f) Council Meeting 23 March 2026
AD3	Prospect Green	Drainage repairs	11,126	11,126	Q1	Reported - Minute 235 Council Meeting 27 April 2026
AD4	Vehicles	Repairs to John Deere Tractor	6,564	6,564	Q1	Reported - Minute 48 (a) Council Meeting 22 June 2026
AD5	Marsh Way Wall	Wall rebuild & Fees	75,000	-	Q3	Agreed – Minute 73 (d) Council Meeting 5 August 2026
AD6	Beaches & Foreshore	Beach Access Vision	10,000	-	Q4	Agreed – Minute 45 (a) Council Meeting 22 June 2026
			126,085	**41,082**		

Treasury Management Outturn Report H1 2026/27

Introduction

The Authority's treasury management strategy for 2026/27 was approved on 12 January 2026. The Authority has invested substantial sums of money and is therefore exposed to financial risks including the loss of invested funds and the revenue effect of changing interest rates. The successful identification, monitoring and control of risk remains central to the Authority's treasury management strategy.

External Context

Economic background: The key story remained the conflict in the Middle East and its impact on global energy prices and inflation, while on the UK politics side, Andy Burham became the new Prime Minister. Although energy prices had shown signs of moderating towards the end of (calendar) Q2, the continuing conflict pushed oil and gas up sharply once again in Q3. Around mid-September, Brent oil and UK gas prices were over 30% and 70% higher respectively compared to the period preceding the Bank of England's (BoE) July Monetary Policy Report (MPR).

Given the inflationary impact of the previous energy shock from the Russia/Ukraine war, central bank policymakers remained alert to higher energy prices feeding into wider price and wage-setting behaviour ('second-round effects'). In the UK, higher fuel and energy prices were evident in headline inflation, but there was limited evidence of material second-round effects. At the same time, underlying wage pressures continued to moderate, and the labour market remained relatively loose.

The BoE's Monetary Policy Committee (MPC) maintained Bank Rate at 3.75% throughout the period. In April the MPC voted by 8-1 to leave rates unchanged, with one member wanting a 0.25% increase. The voting subsequently became more hawkish, moving to 7-2 in June and 6-3 in both July and September, with all dissenters preferring to increase Bank Rate to 4.00%. The change in voting patterns reflected increasing policymaker concern over the persistence of the energy shock and the risk that higher headline inflation could become embedded in domestic prices and wages.

At the September MPC meeting, the Committee judged the inflation risks were further to the upside compared to its July MPR. Energy prices had risen again and borrowing costs were materially higher than before the US/Iran conflict. Despite expecting inflation would rise further in the near-term, most members believed that a soft labour market, spare capacity and restrictive monetary conditions would reduce inflation over time. Moreover, the data showed there was still little evidence of material second-round effects, although the MPC emphasised that the risk of these effects would increase the longer elevated and volatile energy prices persisted.

UK headline consumer price inflation (CPI) initially declined, suggesting the initial energy shock was not spreading into a wider range of goods and services. However, later in the period inflation picked up again, with CPI rising from 2.6% in June to 3.1% in August due largely to higher transport costs. Core CPI was 2.6% in July and August, suggesting the divergence between that and headline inflation was due to energy rather than a broad increase in underlying inflation.

UK economic activity was somewhat stronger than initially anticipated over the period. GDP expanded by 0.6% in the first quarter of the calendar year and 0.5% in the second quarter, slightly stronger than the initial estimate of 0.4%. Monthly activity was more volatile, with a contraction of -0.1% in April, followed by gains of 0%, 0.3% and 0.4% in May, June and July respectively.

Labour market data continued to show softening employment conditions. The unemployment rate fell to 4.9% in April and remained at that level to July, against expectations it would tick up. Job vacancies also continued to decline, to 702,000 in the three months to July. Earnings growth moderated, with regular earnings at 3.5% in the three months to July and total earnings at 3.9%, suggesting weaker labour demand was continuing to restrain domestic wage pressures.

Arlingclose, the authority's treasury adviser, expects Bank Rate will stay at 3.75%. However, higher energy prices due to the ongoing conflict(s) and uncertainty around the government's upcoming Budget have increased the near-term upside risks. Moreover, stronger inflation projections, which accompanied the September MPC decision, shifted market expectations for Bank Rate higher. In addition, despite little evidence of second-round effects to date, the changing tone of the MPC minutes suggests it may not need something seismic to tip the Committee to increase Bank Rate.

The US Federal Reserve held the Fed Funds target range at 3.50%-3.75% through to July. However, inflation pressures rose during the summer, pushing headline CPI to 3.4% in August, with higher petrol prices accounting for much of the increase. This led the Fed to raise its target range to 3.75%-4.00% in September. The move reflected increased concern over inflation at a time when US economic activity and labour-market conditions were relatively resilient.

Following a 0.25% increase in June, the European Central Bank raised its three key policy rates by a further 0.25% in September, taking the deposit facility rate to 2.50%. Inflation increased from 2.9% in July to 3.2% in August, and an initial estimate suggested a further rise to 3.8% in September, with energy prices the principal driver. The ECB emphasised the uncertainty around the duration of the energy shock and the risk prolonged higher inflation could feed into wider price-setting.

Financial markets: After the sharp deterioration early in the period, financial market sentiment improved somewhat as there were ongoing hopes that the US/Iran war would be resolved. However, towards the end of the period, signs of any potential resolution appeared premature and oil prices rose alongside inflation and bond yields while equity market volatility increased as investors weighed conflict-related as well as AI-related concerns.

Bond yields in both the US and UK increased markedly over the period, with the gap between gilts and US Treasuries tightening towards the end of the period. While term premia are still embedded in gilt yields given the relatively uncertain fiscal outlook, a more hawkish Fed alongside persistent US inflation and fiscal concerns have pushed the yields on US Treasuries to their highest levels in years.

Some relatively market-friendly announcements were made by Andy Burnham in his speech at the Labour Party conference, but it will be the Budget at the end of October that will hopefully provide some clarity on what the UK's fiscal position might look like going forward.

Over the period, the 10-year UK benchmark gilt yield started at 4.86% and ended at a high of 5.43%. The 20-year gilt yield starting at 5.45% and finished at 5.93%, another high for the period. The Sterling Overnight Rate (SONIA) averaged 3.73% over the period to 30th September.

Credit review: Arlingclose maintained its advised recommended maximum unsecured duration limit on the majority of the banks on its counterparty list at 6 months. The other banks remain on 100 days.

During the period, Fitch upgraded numerous banks due to a rating methodology change, as well as the reference obligations used for Issuer Default Ratings and introduced more differentiated notching between deposits, senior preferred, senior unsecured and senior non-preferred debt ratings.

Later in the period, Moody's changed the outlook on HSBC to Positive from Stable, while also affirming its long-term deposit rating. This follows a similar action from S&P on HSBC's outlook a few months prior to this.

After spiking in April following escalation in the Iran war, credit default swap prices on UK banks declined during most of the period but started to pick up again in September. They ended the period well below levels that may give cause for concern but remain under constant monitoring.

European banks' CDS prices followed a similar pattern to the UK, while Canadian bank CDS prices rose early in the period and then remained at similar levels, while Australian and Singaporean banks tended to trend downwards.

Overall, at the end of the period CDS prices for all banks on Arlingclose's counterparty list remained within limits deemed satisfactory for maintaining credit advice at current durations.

Financial market volatility is expected to remain a feature, at least in the near term and, credit default swap levels will continue to be monitored for signs of ongoing credit stress. As ever, the institutions and durations on the Authority's counterparty list recommended by Arlingclose remain under constant review.

Local Context

On 31st March 2026, the Authority had net investments of £6.4m (current value) with usable reserves and working capital being the underlying resources available for investment.

Borrowing Strategy during the period

At 30th September 2026 the Authority was debt free. The Authority's capital expenditure plans and treasury strategy does not imply a need to borrow during the remainder of the current financial year.

Treasury Investment Activity

The Authority holds invested funds, representing income received in advance of expenditure plus balances and reserves held. During the year, the Authority's investment balances ranged between £6.4m and £7.47m due to timing differences between income and expenditure and the seasonality of the Authority's revenue generating activities. The investment position and the change over the six

months to 30th September 2026 is shown in Table 1 below. A breakdown of individual investments is shown in **Appendix A**.

Table 1: Treasury Investment Position

Investment Portfolio	31.03.26 Balance £	Net Movement £	30.09.26 Balance £	30.09.26 Income Return %
Banks and building societies (unsecured)	88,484	14,754	103,238	
Money Market Funds	1,250,000	0	1,250,000	
UK Govt/DMADF – DMO Deposit	1,400,000	1,100,000	2,500,000	
Total Internal Investments	**2,738,484**	**1,114,754**	**3,853,238**	**3.82%**
Investments in Pooled Funds:				
Property	2,372,424	-39,311	2,333,113	
Bonds	420,995	-10,281	410,714	
Multi-Asset	873,755	-1,534	872,221	
Total External Funds-Market Value	**3,667,174**	**-51,126**	**3,616,048**	**4.86%**
TOTAL INVESTMENTS	**6,405,658**	**1,063,628**	**7,469,286**	**4.32%**

Both the CIPFA Code and government guidance require the Authority to invest its funds prudently, and to have regard to the security and liquidity of its treasury investments before seeking the optimum rate of return, or yield. The Authority's objective when investing money is to strike an appropriate balance between risk and return, minimising the risk of incurring losses from defaults and the risk of receiving unsuitably low investment income.

The Authority expects to be a long-term investor and treasury investments therefore include both short-term low risk instruments to manage day-to-day cash flows and longer-term instruments where limited additional risk is accepted in return for higher investment income to support local public services.

Bank Rate remained at 3.75% during the period. The rates on DMADF deposits ranged between 3.74% and 4.11% and money market rates between 3.85% and 3.89%.

The progression of risk and return metrics are shown in the extracts from Arlingclose's quarterly investment benchmarking in Table 2 below.

Table 2: Investment Benchmarking – Treasury investments managed in-house

	Credit Score	Credit Rating	Bail-in Exposure	Weighted Average Maturity (days)	Rate of Return %
31.03.2026	4.30	AA-	49%	29	3.63%
30.09.2026	3.97	AA-	35%	76	3.82%
All LAs	4.58	A+	67%	10	3.93%

Externally Managed Pooled Funds:

£3.61m current value/£3.51m book value of the Authority's investments are held in externally managed strategic pooled bond, multi-asset and property funds where short-term security and liquidity are lesser considerations, and the objectives instead are regular revenue income and long-term price stability.

In the 1-year period to 30th September 2026, these funds generated an income return of £179k (4.85%), which is used to support services in year. The total unrealised capital gain from purchase at 30th September 2026 is £98k. However, this is in total with two of the long-term investments showing unrealised capital losses and one a capital gain. The individual investments are shown in **Appendix A.**

Financial markets experienced significant volatility over the six months to 30th September 2026, although performance varied considerably between asset classes. Equity markets generally performed well, recovering strongly from the falls seen in March and remaining resilient despite renewed geopolitical uncertainty and higher interest rates. UK equities recorded gains over the period, while global equities were also supported by generally resilient corporate earnings and continued strength in technology-related stocks.

Bond markets were considerably weaker, particularly towards the end of the period. Government bond yields rose as higher energy prices and rising inflation increased expectations that interest rates would remain higher for longer. Longer-dated yields were also affected by concerns over elevated government borrowing and bond issuance, with investors demanding greater compensation for holding longer-term debt. These pressures were not confined to the UK, with government bond yields rising across most major developed economies. This rise placed downward pressure on the capital values of funds with exposure to bonds.

UK commercial property experienced some weakness in capital values over the period as higher gilt yields and interest rates continued to weigh on valuations. However, rental income remained relatively resilient. Property capital values had already undergone a significant adjustment following the rise in interest rates during 2022 and have recovered only modestly since, meaning recent falls have generally been relatively limited.

Income distributions from strategic pooled funds generally remained resilient over the period, despite the volatility in underlying asset prices. However, distributions from individual funds can vary between periods depending on their payment frequency, the timing of underlying income receipts and fund distribution policies. Performance over a six-month period should therefore not be viewed in isolation when assessing the longer-term income generated by these investments.

As Council moves towards the implementation of the Green Seafront Scheme, it will need to consider the redemption of the majority of its strategic investments. It is anticipated that these funds will be required in Q4 2027/28, however this is subject to an agreed timetable once the tender has been awarded.

Estimates for income 2025/26

Income returns remained above budget at an average of 4.32%. The Authority has budgeted £220,000 income from these investments in 2026/27. Income received up to 30 September was £146k against a £110k budget, with interest rates and balances higher than those budgeted.

Table 3: Income-Actual v Budget 30 September 2026

	Actual £k	Budget £k	Under/Over £k
Treasury Investment Income	146	110	36

No funds have been appropriated to the Treasury Risk Management Reserve during H1. This reserve currently holds £214k, with the losses on the M&G and Ninety-One investments standing at £217k. Any requirement to further cushion the council against any potential losses will be assessed on an ongoing basis.

Compliance

The Finance Manager reports that all treasury management activities undertaken during the half year complied fully with the CIPFA Code of Practice and the Authority's approved Treasury Management Strategy.

Appendix A

Investments held at 30/09/2026

Short Term Investments			
Type of Investment	**Counterparty**	**Amount held (at 30/09)**	**Maturity date**
MONEY MARKET FUND	ABERDEEN ASSET MANAGEMENT	500,000	t+1
MONEY MARKET FUND	CCLA - PSDF	750,000	t+1
DEPOSIT - DMADF	DEBT MANAGEMENT OFFICE	650,000	18/12/2026
DEPOSIT - DMADF	DEBT MANAGEMENT OFFICE	250,000	29/10/2026
DEPOSIT - DMADF	DEBT MANAGEMENT OFFICE	550,000	25/02/2027
DEPOSIT - DMADF	DEBT MANAGEMENT OFFICE	300,000	27/11/2026
DEPOSIT - DMADF	DEBT MANAGEMENT OFFICE	750,000	30/03/2027
Total		**3,750,000**	

Strategic Investments				
Fund Name	**Purchase Cost**	**Current Value (at 30/09)**	**Gain/Loss**	**Notice period**
CCLA - LAMIT Property Fund	2,017,940	2,333,113	315,173	6 months
M&G STRATEGIC CORPORATE BOND FUND	500,000	410,714	(89,286)	t+5
NINETY ONE - DIVERSIFIED INCOME FUND	1,000,000	872,221	(127,779)	t+3
Total	**3,517,940**	**3,616,048**	**98,108**	

Agenda Item 3 c)

Capital Programme – Monitoring Report 2026/27

Project Ref:	Project	Budget b fwd	2026/27 Estimate	Forecast Outturn for the year	Actual Expenditure Year to Date
		£	£	£	£
1	**Downs**				
	Peveril Point Stabilisation Scheme	48,875	0	48,875	0
2	**IT-All departments**				
	PC replacement	22,000	0	22,000	0
3	**Green Seafront Scheme**				
	Stabilisation & Regeneration		235,000	235,000	70,522
4	**Capital Grants**				
	Day's Park Community Sports facility	100,500	120,500	0	0
5	**Town Hall**				
	Annexe heating system		10,000	6,000	6,279
6	**Car Parks**				
	Main Beach- Phase 3 & EVCP Installation	0	0	0	0
	Total Capital Expenditure	**171,375**	**365,500**	**312,154**	**76,801**

Project Updates:

1: Downs-Peveril Point Stabilisation Scheme

This scheme has been brought forward from 2025/26. As previously reported Council approved the direct award of the contract to Dorset Council (via the NEC3 TSC.HMEP contract) to undertake surface improvement works on Peveril Point Road for a sum of £48,875, Minute 177 (b) 26 January 2026. Although initially programmed for September/October 2026, this was revised to March 2027, as previously reported. However, it is now anticipated that works will start in December 2026, subject to Dorset Council's works programme.

Ongoing: Financing -UCRR

2: IT – All Departments

This scheme has been brought forward from 2025/26. Discussions continue regarding the specification of any tender that is issued for the procurement of IT equipment/services. Further discussions regarding investing in digital transformation are also ongoing and how the Council may incorporate this into this project.

Ongoing: Financing – EMR

3. Spa & Seafront- Green Seafront Scheme

At the Council meeting held 17 November 2025, Minute 131 (a) Members approved the appointment of WSP (Collaboration Agreement Schedule #3 with Dorset Council) to deliver the professional services required for the submission of planning applications for both the essential and enhanced Green Seafront Schemes, for the sum of £135k. Further approval (Collaboration Agreement #4) Minute 238 (a) 27 April 2026 was given to appoint WSP for Procurement Strategy and Market Engagement with a

budget of £16,745. Additionally, on 5 August 2026, Council awarded a contact to WSP to provide phase 1 procurement support, Minute 73 (b) to a value of £65k (through Collaboration Agreement #6 with Dorset Council) and a diversion design (Collaboration Agreement Schedule #4 with DC) for £3,548, Minute 73 (c).

At its meeting on 19 October, Council approved delegated authority for Officers to procure technical support as required in order to progress the tender pack for the scheme.

Planning approval was granted on 21 October 2026. Officers are currently working towards issuing the SQ and completing the employers' requirements. This project continues to evolve, and updates are provided regularly to Council.

With regards to funding the scheme, Dorset Council approved the allocation of £0.5m of funds from CIL monies and £2.5m in the form of a grant to fund this project.
Ongoing. Financing -EMR/UCRR/CIL/Third Party Grant Funding

4: Capital Grants – Swanage & Herston Football Club or CIO
At its meeting on 28 April 2025, Minute 230, Council approved the allocation of £100,000 of the Community Sports Facility budget towards the installation of the 3G pitch, subject to a robust business plan and lease agreement.

Talks continue as to the best way forward to deliver this project, with the added complexity of repairing works that are required to the building, as noted in Minute 242, 6 May 2026, which Council are funding in the form of revenue grants.
Ongoing – Financing – EMR/Third Party Funding (refer to Q1 budget report pg 9)

5: Town Hall – Annexe Heating System
As agreed by the Environment and Green Spaces Committee, Minute 6 of the meeting held on 24 June 2026, quotes were sought for the installation of a new boiler in the Town Hall Annexe.

Following the receipt of quotes, the contract was awarded to Westmade and works completed in October 2026.
Completed – Financing - EMR

6: Car Parks – Electric Vehicle Charging Point Installation (for information only)
This project was reviewed by Council at an Extraordinary Meeting of the Council held on 5 August 2026, Minute 72 (a). It was agreed that the council would proceed with the Charging Ahead grant application. 14 chargers in total: 2 x 75kW chargers in Mermond Place, 6 (3 dual post) x 7.4kW chargers in both the Main and North Beach car parks. The total costs of the project will be £180,503, with 60% being funded by Dorset Council (with the council paying up front and reclaiming the costs from Dorset Council through a grant) and 40% being funded directly from Connected Kerb.
Ongoing: – Financing - Third Party Contributions

Potential Additon to the Capital Programme:
Tourist Information Centre – Air Source Heat Pump

As reported in Q1, at the Environment & Green Spaces Committee meeting held 24 June 2026, and subsequently approved by Members at the Council Meeting held 20 July 2026, Minute 55 (a), approval was given to source quotes for the installation of an Air Source Heat Pump at the TIC.

Quotes have now been requested and the finalisation of the scope of works will be required in order to assess comparable quotes. Once quotes have been finalised, an application will be submitted to Low Carbon Dorset (LDC) for 50% funding for the installation.

Ongoing - Financing – EMR & Third Party Grant Funding

Alison Spencer - Finance Manager
Martin Ayres-Town Clerk
Gail Percival-Assets and Compliance Manager

November 2026

DRAFT Data Protection Policy

Contents

1. Aims 2
2. Scope 2
3. Distribution 2
4. Definitions 2
5. Roles and Responsibilities 4
6. Data Protection Officer (DPO) 5
7. Data Subject Rights 5
8. Data Protection Principles 7
9. Processing Personal Data 9
10. Third Parties with Access to Personal Data 11
10.1. Data Sharing 11
10.2. Third-Party Processors 11
11. Data Protection by Design and Default 12
12. Personal data breaches or near misses 12
13. Destruction of records 12
14. Training 13
15. Monitoring Arrangements 13
16. Complaints 13
17. Legislation and Guidance 14
18. Links with Other Policies 14
19. Approval 14

Appendix 1 – Examples of Special Category Data that we process 15

Appendix 2 – Subject Access Request Procedure (SAR) 16

Date	Summary of changes	Author
Oct 2023	Adopted by Swanage Town Council	One West
Nov 2026	Amendments made in accordance with revised template document, incorporating Special Category Data Policy; addition of right to complain, in accordance with DUAA, as well as a reference to AI tools under Automated Decision Making. Addition of reference to recognised legitimate interests.	One West template document - tailored for STC by Town Clerk

DRAFT Data Protection Policy

1. Aims

The management team and councillors at Swanage Town Council are committed to ensuring that all personal data collected is processed in accordance with all relevant data protection laws including the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 (DPA 2018).

Swanage Town Council is registered as a data controller with the Information Commissioner.

The details of the Town Council's Data Protection Officer (DPO) can be found at paragraph 6.

2. Scope

This policy applies to anyone who has access to data and/or is a user of Swanage Town Council's ICT systems, both in and out of Swanage Town Council, including staff, councillors, volunteers, visitors, contractors, and other community users.

This policy is also intended to serve as the Appropriate Policy Document for the processing of special category data and criminal record data (where applicable).

This policy applies to all personal data for which Swanage Town Council is the data controller, regardless of whether it is in paper or electronic format.

3. Distribution

This policy is available on Swanage Town Council's website and in hard copy from the Town Hall.

4. Definitions

Personal data - Any combination of data items which could identify a living person and provide specific information about them, their families or circumstances. The term covers both facts and opinions about an individual. We may process a wide range of personal data of staff, councillors, volunteers and residents as part of our operation. A non-exhaustive list of examples of the types of personal data that we process may be found in our privacy notices.

Special category personal data - Formerly known as "sensitive personal data", special category data is information that is a lot more sensitive to that person and needs more protection. These are:

- racial or ethnic origin
- political opinions
- religious / philosophical beliefs
- trade union membership
- genetic data
- biometric data (for identification purposes)
- health data (mental and physical)
- sex life or sexual orientation

Examples of the types of special category data we process can be found at Appendix 1. Our Record of Processing Activities (RoPA) details the types of information we hold and the grounds upon which we process it, as do our privacy notices which can be found on our website.

Data Subject(s) - The data subject is the person about whom the personal data relates or identifies.

Data Processing - Data processing is an over-arching term that means "doing something" with personal data. This commonly includes:

- Collecting or collating the data
- Analysing the data
- Sharing the data
- Storing the data
- Destroying the data

Data Controller - The data controller is occasionally the person or more commonly the organisation with overall responsibility for the processing of personal data that organisation undertakes. They will make all the decisions about what is captured, how it's used and the purpose for it, as well as deciding what controls need to be in place.

Data Processor - is occasionally a person, but more commonly an organisation commissioned by a data controller to carry out their data processing on behalf of the data controller. These are often software providers such as Microsoft or contracted out services such as an insurance company. Essentially, a data processor is acting as an extension of the data controller, so must operate under the data controller's instructions, and under the terms of a data processing agreement (contract).

Data Sharing - means *giving* data to another data controller, for them to use for their own purposes. Once you have shared personal data, the recipient becomes the data controller of that information, and therefore makes the decisions over what they will do with it.

Note, we do NOT *share* data with our data processors, as these are processing it under our data controllership.

Data Breach - The most common type of data breach is the accidental or unlawful *loss, alteration, destruction, disclosure of or access to* personal data, for example sending an email to the wrong recipient, losing a file containing personal data, or sharing passwords enabling someone else to access your account. However, we consider any failing of one of the data protection principles (Article 5 of UK GDPR) as a breach of data protection legislation, so could include examples such as not having the necessary paperwork in place, not providing the data subject with clear privacy information, retaining personal data for longer than is necessary or processing personal data without an identified lawful basis (Article 6 of UK GDPR).

Data Processing Agreement – a legally binding contract between the data controller and its data processor. This contract defines exactly how the data controller expects the data processor to process its personal data and follow standard contract clauses.

Data Sharing Agreement - a non-legally binding written agreement between data controllers where there is regular sharing of personal data. The data sharing agreement should define who is involved in the agreement, what data is being shared, why the recipient needs the data, how this is lawful, how the data will be shared.

5. Roles and Responsibilities

Councillors - have overall responsibility for ensuring that Swanage Town Council complies with all relevant data protection obligations.

Data Protection Lead – the Town Clerk acts with the delegated authority of the councillors on a day-to-day basis and will liaise with the DPO. In their absence, in case of emergency, this role will be delegated to the Finance Manager.

All other staff (as defined in scope) - All staff are responsible for:

- Familiarising themselves with and complying with this and related policies. The learning culture within the organisation seeks the avoidance of blame and is key to allowing individuals the confidence to report genuine mistakes. However, staff should be aware, that a deliberate or reckless disregard of this policy could result in disciplinary action being taken;
- Taking care to ensure the safe keeping of personal data, minimising the risk of its loss or misuse at all times. All staff should adopt the approach that they should treat the personal data of others with the same care with which they would treat their own;
- Only using computers and other devices authorised by Swanage Town Council for accessing and processing personal data ensuring that they are properly "logged-off" at the end of any session in which they are using personal data; and locking devices when they are temporarily left unattended at any point (Windows Button □ + L is a handy shortcut);
- Storing, transporting and transferring data using encryption and secure password protected devices;
- Not transferring personal data offsite or to personal devices;
- Deleting any data they hold in line with this policy and the retention schedule;
- Informing Swanage Town Council of any changes to their personal data, such as a change of address;
- Reporting to the Data Protection Lead, or in their absence the Finance Manager or DPO in the following circumstances:
    - Any questions about the operation of this policy, data protection law, retaining or sharing personal data or keeping personal data secure;
    - If they have any concerns that this policy is not being followed;
    - If they are unsure whether they have a lawful basis upon which to use personal data in a particular way;
    - If they need to rely on or capture consent, deal with data protection rights invoked by an individual, or transfer personal data outside the UK and European Economic Area;
    - The discovery of a data breach or near miss (immediate action is required) – please refer to section 12 of this policy and the Data Breach Policy;
    - Whenever they are engaging in a new activity that may affect the privacy rights of individuals;
    - If they are to share personal data with a data processor, for example a contractor or someone offering a service, in which case a contract is likely to be required and

potentially a data protection impact assessment (DPIA), please see - *Sharing Personal Data* (section 10).

6. Data Protection Officer (DPO)

The Data Protection Officer (DPO) is responsible for advising on the implementation of this policy, monitoring compliance with data protection law, providing support and developing related policies and guidelines where applicable, in amongst other data protection related functions. They will provide an annual report on compliance to the organisation and, where relevant, provide the organisation with advice and recommendations on data protection issues.

Swanage Town Council has appointed One West as its DPO, and they can be contacted at:

One West (Bath and North-East Somerset Council)
Guildhall, High Street, Bath, BA1 5AW

Email: i-west@bathnes.gov.uk
Telephone: 01225 395959

Under usual circumstances the Data Protection Lead will be the point of contact with the DPO.

7. Data Subject Rights

In all aspects of its work, the organisation will ensure that the rights of the data subject are protected by all practicable measures associated with the conduct of our work. Subject to exceptions, the rights of the data subject as defined in law are:

7.1. Right to be informed.

We advise individuals how we will use their data through the use of transparent privacy notices and other documentation, such as data capture and consent forms where appropriate.

7.2. Right of access

An individual when making a subject access request (SAR) is entitled to the following;

- Confirmation that their data is being processed;
- Access to their personal data;
- Other supplementary information – this largely corresponds to the information that should be provided in a privacy notice.

We must respond to such a request within one calendar month unless the request is complex, in which case it may be extended by up to a further two calendar months. Please refer to Appendix 2 for further details as to how to manage a subject access request.

7.3. Right to rectification

Individuals have the right to ask us to correct information they think is inaccurate or incomplete. We have a duty to investigate any such claims and rectify the information where appropriate within one calendar month, unless an extension of up to a further two calendar months can be justified.

7.4. Right to erasure

Individuals have a right to request that their personal information is erased but this is not an absolute right. It applies in circumstances including where:

- The information was given voluntarily, consent is now withdrawn and no other legal basis for retaining the information applies;
- The information is no longer required;
- The data was collected from a child for an online service; or
- We have processed the data on the basis that it is in their legitimate business interests to do so, and having conducted a legitimate interests test, we conclude that the rights of the individual to have the data erased outweigh those of Swanage Town Council to continue to process it.

We will consider such requests as soon as possible and within one month, unless it is necessary to extend that timeframe for a further two months on the basis of the complexity of the request or a number of requests have been received from the individual.

7.5. Right to restrict processing

This is not an absolute right. An individual may ask us to temporarily limit the use of their data (for example, storing it but not using it) when we are considering:

- A challenge made to the accuracy of their data, or
- An objection to the use of their data.

An individual may also ask us to restrict the destruction of a record, if they wish it to be retained beyond the normal retention period.

In addition, we may be asked to limit the use of data rather than delete it:

- If the individual does not want Swanage Town Council to delete the data but does not wish it to continue to use it;
- In the event that the data was processed without a lawful basis;
- To create, exercise or defend legal claims.

7.6. Right to data portability

An individual can make a request in relation to data which is held electronically for it to be transferred to another organisation or to themselves where they have provided it either directly or through monitoring activities e.g. apps. We only have to provide the information where it is electronically feasible.

7.7. Right to object

Individuals have a right to object in relation to the processing of data in respect of:

- a task carried out in the public interest except where personal data is processed for historical research purposes or statistical purposes;
- a task carried out for the exercise of official authority;
- a task carried out in its legitimate interests;
- scientific or historical research, or statistical purposes, or
- direct marketing.

Only the right to object to direct marketing is absolute, other objections will be assessed in accordance with data protection principles. We will advise of any decision to refuse such a request within one month, together with reasons and details of how to complain and seek redress.

7.8. Right to complain

Individuals have the right to complain about the way in which an organisation processes their personal data. This is the first stage, before the Information Commissioner will consider a personal data complaint. Our Complaints Procedure can be found on our website.

7.9. Rights related to automated decision making.

This does not apply as Swanage Town Council does not employ automated decision-making processes.

8. Data Protection Principles

Data protection legislation is based on seven key data protection principles that Swanage Town Council complies with.

The principles say that personal data must be:

- **Processed lawfully, fairly and in a transparent manner** – we will explain to individuals why we need their data and why we are processing it – for example on consent forms (where consent is used as the basis for processing), and in our Privacy Notice(s). We review our documentation and the basis for processing data on a regular basis.
- **Collected for specified, explicit and legitimate purposes** – we explain these reasons to the individuals concerned when we first collect their data. If we wish to use personal data for reasons other than those given when the data was first obtained, we will inform the individuals concerned before doing so, and will seek consent where necessary and appropriate unless the new purpose is compatible with that in respect of which consent was given, or there is another lawful basis for sharing the information. In which case, we will document the basis for processing.
- **Adequate, relevant and limited to what is necessary to fulfil the purposes for which it is processed -** we must only process the minimum amount of personal data that is necessary in order to undertake our work.
- **Accurate and, where necessary, kept up to date** – we will check the details of individuals on our databases at appropriate intervals and maintain the databases. We will consider and respond to requests for inaccurate data to be rectified in accordance with the Data Protection Act 2018.
- **Kept for no longer than is necessary for the purposes for which it is processed** – we review what data we hold at appropriate intervals – for example upon the annual review of the Record of Processing Activities (or sooner if needed). We have a retention schedule which governs how long all data including special category data shall be retained for. When we no longer need the personal data we hold, we delete it, securely destroy it in line with our retention and disposal policy, or render it permanently anonymous. We only keep personal

data, including special category data, in an identifiable form for as long as is necessary for the purposes for which it was collected, or where there is a legal obligation to do so;

- **Processed in a way that ensures it is appropriately secure** – Swanage Town Council implements appropriate technical measures to ensure the security of data and systems for staff and all users. Please refer to the Information Security Policy.
    - We adopt a risk- based approach to taking data offsite. Unless absolutely necessary, hard copies of special category personal data will not be removed from our premises.
    - Any decision to remove the information must be based on the business need of the organisation or in the best interests of the individual, rather than for the convenience of the individual member of staff. It is always preferable for any special category data to be accessed via appropriately encrypted means rather than hard copy, when off-site.
    - If there is no reasonable alternative to removing hard copies from the offices of Swanage Town Council, the following procedure will apply:
        i. A record of what information has been removed will be logged on site with the office so that there is a record of what has been removed;
        ii. Information will be transported and stored in a secure manner;
        iii. We adopt a risk-based approach, for example hard copy personal data with lower sensitivity (e.g. notebooks) may be taken off site, but if left in a vehicle must be locked in the boot, never left in a visible place, only for the shortest period of time and never overnight. Special category data (e.g. health data) must be kept on the staff member's person at all times.
        iv. Special category data must be returned to our premises at the end of the working day. If this is not practicable, and a staff member needs to retain the information in their personal possession, this must be discussed in advance with a member of the management team including what measures will be taken to safeguard the information, given the risks that are beyond a staff member's control in so doing and the potential consequences ensuing. The relevant member of the management team must record their decision.
        v. Data will be tidied away when not in use (e.g. when staff undertake working at home, it must be out of sight of family members, not left out, and tidied away).
        vi. Only those who have need to access the data concerned will be granted permission and access to it.
    - **Accountability –** Swanage Town Council complies with its obligations under data protection laws including the UK GDPR and can demonstrate this via the measures set out in this policy including completing data protection impact assessments (DPIAs) where necessary; integrating data protection into internal documents including this policy, any related policies and privacy notices; regularly training members of staff on all relevant data protection law, including this and any related policies; reviewing and auditing privacy measures and compliance; maintaining and reviewing records of its processing activities for all personal data that it holds; reviewing and ensuring familiarity of policies related to the handling of data; reviewing reasons for data breaches; and ensuring stakeholders manage risks and compliance.

9. Processing Personal Data

In order to ensure that Swanage Town Council's processing of personal data is lawful; we will always identify one of the following six grounds for processing **before** starting the processing:

- The data needs to be processed so that we can fulfil a **contract** with the individual, or the individual has asked us to take specific steps before entering into a contract;
- The data needs to be processed so that we can comply with a **legal obligation;**
- The data needs to be processed to ensure the **vital interests** of the individual, i.e. to protect someone's life;
- The data needs to be processed so that we, as a public authority, can **perform a task in the public interest, or carry out our official functions**;
- The data needs to be processed for our **legitimate interests** or those of a third party where necessary, balancing the rights of the individual (unless the processing is necessary for a 'recognised' legitimate interest). However, where we can use the public task basis for processing, we will do so rather than rely on legitimate interests as the basis for processing.
- The individual (or their parent/carer when appropriate in the case of a child) has freely given clear **consent**. We will seek consent (where appropriate) to process data from the individual or parent, depending on their mental capacity to understand what is being asked for.

9.1. Processing Special Categories of Personal Data

In addition to the legal basis to process personal data, special categories of personal data also require an additional condition for processing under Article 9 of the UK GDPR. The grounds that we may rely on include:

a) The individual has given **explicit consent** to the processing of those special categories of personal data for one or more specified purposes;

b) Processing is necessary for the purposes of carrying out the obligations and exercising specific rights under **employment and social security and social protection law and research***; a full list can be found in Schedule 1 Part 1 of the Data Protection Act 2018.

c) Processing is necessary to protect the **vital interests** of the individual or of another natural person where the individual is physically or legally incapable of giving consent;

d) Processing is carried out in the course of its legitimate activities by a **not-for-profit organisation** with a political, philosophical, religious, or trade union aim on the condition that the processing relates solely to its members, or former member who have regular contact with it, and that the personal data are not disclosed outside that body without consent.

e) Processing relates to personal data which are **manifestly made public** by the individual;

f) Processing is necessary for the establishment, exercise or defence of **legal claims** or whenever courts are acting in their judicial capacity;

g) Processing is necessary for reasons of **substantial public interest*** but must be clearly demonstrated and assessed as part of the public interest test and evidenced throughout the decision- making process.

These grounds include the following (the full list of defined purposes may be found in Schedule 1 Part 2 of the Data Protection Act 2018):

- Statutory and government purposes
- Safeguarding of children or individuals at risk
- Legal claims
- Equality of opportunity or treatment
- Counselling
- Occupational pensions

h) Processing is necessary for the purposes of **preventive or occupational medicine**, for the assessment of the working capacity of the employee, medical diagnosis, the provision of **health or social care** or treatment or the management of health or social care systems and services on the basis of Union or Member State law or pursuant to contract with a health professional and subject to the conditions and safeguards referred to in paragraph 3;

i) Processing is necessary for reasons of **public interest in the area of public health*;**

j) Processing is necessary for **archiving purposes in the public interest, scientific or historical research purposes or statistical purposes**.

Deciding upon the correct legal basis for processing data can be difficult and more than one ground may be applicable. We consult with the Data Protection Officer where appropriate.

* We must also comply with Schedule 1 of the Data Protection Act (as well as Articles 6 and Article 9), when we are processing data where the conditions relate to employment, health and research or substantial public interest.

9.2. Legal basis for processing criminal offence data

Criminal offence data includes information about criminal allegations, criminal offences, criminal proceedings and criminal convictions.

We do not maintain a register of criminal convictions.

When processing this type of data, we are most likely to rely on one of the following bases:

- The processing is necessary for the purposes of performing or exercising obligations or rights which are imposed or conferred by law on the controller or the individual in connection with employment, social security or social protection;
- The processing is necessary for the purposes of protecting the physical, mental or emotional well-being of an individual;
- The processing is necessary for statutory purposes; or
- Consent – where freely given. We acknowledge because of the potential for the imbalance of power that it may be difficult for consent to be deemed valid and will only rely on this where no other grounds apply.

10. Third Parties with Access to Personal Data

Please refer to our privacy notices for details of who, aside from Swanage Town Council, has access to the personal data processed.

10.1. Data Sharing

Swanage Town Council will only share personal data under limited circumstances, when there is a lawful basis to do so and where identified in the Privacy Notice(s). The following principles apply:

- We will share data if there is an issue with an individual or parent/carer that puts the safety of staff or others at risk;
- We will share data where there is a need to liaise with other agencies. We will seek consent as necessary and appropriate before doing so. However, where child protection and safeguarding concerns apply, we will apply the "Seven golden rules of information sharing." In limited circumstances, data may be shared with external agencies without the knowledge or consent of the parent or child in line with the DPA 2018, which includes 'safeguarding of children and individuals at risk' as a condition that allows practitioners to share information without consent;

We may also disclose personal data to law enforcement and government bodies where there is a lawful requirement / basis for us to do so, including:

- For the prevention or detection of crime and/or fraud;
- For the apprehension or prosecution of offenders;
- For the assessment or collection of tax owed to HMRC;
- In connection with legal proceedings;
- For research and statistical purposes, as long as personal data is sufficiently anonymised, or consent has been provided or it is otherwise fair and lawful to do so.

We may also share personal data with emergency services and local authorities to help them to respond to an emergency situation.

10.2. Third-Party Processors

Swanage Town Council's suppliers and contractors, including its Data Protection Officer and IT provider, may need access to data to provide services. When third parties are processing personal data on behalf of us, we will:

- Only appoint suppliers or contractors who can provide sufficient guarantees that they comply with data protection law;
- Establish a data processing contract with the supplier or contractor, either in the contract or as a standalone agreement, to ensure the fair and lawful processing of any personal data dislosed;
- Only provide access to data that the supplier or contractor needs to carry out their service, and information necessary to keep them safe while working.

11. Data Protection by Design and Default

Swanage Town Council has a legal obligation to integrate appropriate technical and organisational measures into all of its processing activities, and to consider this aspect before embarking on any new type of processing activity.

It is a statutory requirement that any activity involving a high risk to the data protection rights of the individual when processing personal data be assessed by a data protection impact assessment. Prior to the commencement of any such activity, One West must be consulted and an initial screening be conducted assessing risk.

Please refer to the Information Security Policy for further detail as to how we implement this principle in practice.

12. Personal data breaches or near misses

A personal data breach is defined as *"a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed in connection with the provision of a public electronic communications service."* It may be deliberate or accidental.

Wherever it is believed that a security incident has occurred, or a "near-miss" has occurred, the staff member must inform the Data Protection Lead and DPO **immediately** in order that an assessment may be made as to whether the ICO should be informed within 72 hours as is legally required, and / or those data subjects affected by the breach. The learning culture within the organisation seeks the avoidance of a blame culture and is key to allowing individuals the confidence to report genuine mistakes.

Further details on security incidents and data breaches can be found in the Data Breach Policy.

13. Destruction of records

We adhere to our retention schedule and will permanently securely destroy both paper and electronic records securely in accordance with these timeframes.

We will ensure that any third party who is employed to perform this function has the necessary accreditations and safeguards.

Where we delete electronic records and our intention is to put them beyond use, even though it may be technically possible to retrieve them, we will follow the Information Commissioner's guidance on deleting data and this information will not be made available on receipt of a subject access request.

14. Training

To meet our obligations under data protection legislation, we will ensure that all staff, volunteers and councillors receive an appropriate level of data protection training as part of their induction and regular refresher training. Those who have a need for additional training will be provided with it, for example relating to use of systems or CCTV.

Data protection also forms part of continuing professional development. Staff members undertake regular informal discussions on data protection, to ensure key updates are provided where changes to legislation, guidance or our processes make it necessary. This will include lessons learned from data breaches and near misses, preventative measures to avoid them, and other best practice as advised.

15. Monitoring Arrangements

Whilst the DPO is responsible for advising on the implementation of this policy and monitoring Swanage Town Council's overall compliance with data protection law, we are responsible for the day-to-day implementation of the policy and for making the DPO aware of relevant issues which may affect our ability to comply with this policy and the legislation.

This policy will be reviewed annually, unless an incident or change to regulations dictates a sooner review.

16. Complaints

Swanage Town Council is always seeking to implement best practice and strives for the highest standards. We operate an "open door" policy to discuss any concerns about the implementation of this policy or related issues. Our Complaints Procedure can be found on our website.

Individuals have the right to make a complaint to us about the way in which we process personal data. There is also a right to make a complaint to the Information Commissioner, but complaints should be raised with us first in accordance with the Town Council's Complaints Procedure.

The ICO is contactable at:

www.ico.org.uk

Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Telephone: 0303 123 1113

17. Legislation and Guidance

This policy takes into account the following:

- The UK General Data Protection Regulation (UK GDPR)
- The Data Protection Act (DPA) 2018
- The Data (Use and Access) Act 2025 (DUAA)
- The Protection of Freedoms Act 2012
- Guidance published by the Information Commissioner's Office
- Information Sharing – Advice for Practitioners – DfE July 2018.

18. Links with Other Policies

This Data Protection Policy is linked to the following:

- Data Breach Policy
- Information Security Policy
- Internet and E-Mail Policy
- Social Media Policy
- IT Policy
- Retention Schedule
- Privacy Notices

19. Approval

This policy was approved by the Town Council on [DATE] 2026

Signed:

Martin Ayres

Town Clerk

Appendix 1 – Examples of Special Category Data that we process

Examples of where we may process special category data include in:

Employee health data and information concerning their racial / ethnic origin

Staff application forms

HR files including and disciplinary and capability proceedings which may include DBS, and right to work checks, health, and equal opportunities data (disability, race, ethnicity, sexual orientation).

Accident reporting documentation

Our Record of Processing Activities (RoPA) details the types of information we hold and the grounds upon which we process it; as does our Privacy Notice which can be found on our website.

Appendix 2 – Subject Access Request Procedure (SAR)

Swanage Town Council shall complete the following steps when processing a request for personal data (Subject Access Request or SAR) with advice from its Data Protection Officer (One West).

1. Ascertain whether the requester has a right to access the information and capacity.
2. Obtain (reasonable and proportionate) proof of identity.
3. Engage with the requester if the request needs clarifying.

   Nb only once steps 2 and 3 have been completed, can the "clock" start.
4. Make a judgement on whether the request is complex and therefore can be extended by an additional two months.
5. Acknowledge the requester providing them with
   a. the response time – one calendar month (as standard), an additional two months if complex; and
   b. details of any costs – free for standard requests, or we can charge, or refuse to process, if the request is manifestly unfounded or excessive, or further copies of duplicate information is required, the fee must be in line with the administrative cost.
6. Use its Record of Processing Activities and/or data map to identify data sources and where they are held.
7. Collect the data (the organisation may use its IT support to pull together electronic data sources such as emails and databases).
8. If (6) identifies third parties who process it, then engage with them to release the data to Swanage Town Council.
9. Review the identified data for exemptions and redactions in line with the ICO's Guide to the Right of Access and in consultation with the organisation's Data Protection Officer (One West).
10. Create the final bundle and check to ensure all redactions have been applied.
11. Submit the final bundle to the requester in a secure manner and in the format they have requested.