

Full Privacy Notice

25 February 2026

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Your privacy: Your right to be informed.

South Gloucestershire Council is committed to protecting your privacy when you use our services. This Privacy Notice explains how we use information about you and how we protect your privacy.

We have a Data Protection Officer who makes sure we respect your rights and follow the law. If you have any concerns or questions about how we look after your personal information, please contact the Data Protection Officer at DPO@southglos.gov.uk, or write to us at the following address and we will be pleased to help you:

Data Protection Officer,
PO Box 1953,
The Council Offices,
Badminton Road,
Bristol,
BS37 0DB.

Please see Appendix 1 for a full list of personal data that is processed by the Council.

Why we use your personal information

What is personal information?

Personal information can be anything that identifies and relates to a living person. This can include information that when put together with other information can then identify a single individual. For example, this could be your name and address.

Did you know that some of your personal information might be considered ‘special category’?

Some information is legally defined as special category and needs more protection due to its sensitivity. It’s often information you would not want widely known and is very personal to you. This is likely to include anything that can reveal your:

- physical or mental health
- genetic/biometric data
- religious or philosophical beliefs
- ethnicity
- sexuality and sexual health
- trade union membership
- political opinion
- criminal history

What is our legal basis for processing your personal data?

UK data protection laws require us to have a valid reason for using your personal data. The reason will depend on the service you are being provided.

In most cases, we use your information because we are required to do so by law, or because it is necessary for us to carry out our public duties. In some situations, we may use your information because you have asked us to provide you with a service, because we have a contract with you or because you have given us your consent.

Depending on the service we may rely on one of more of the following lawful bases under Article 6 of the UK GDPR:

- **Article 6(1)(c)** – Legal Obligation: where we are required to use your information to comply with the law.
- **Article 6(1)(e)** – Public Task: where using your information is necessary for us to carry out our functions as a public authority or in the public interest.
- **Article 6(1)(b)** – Contract: Where using your information is necessary to enter into, or perform a contract with you.
- **Article 6(1)(a)** – Consent: where you have given clear permission for us to use your information for a specified purpose, though as a local authority we do not tend to rely on this basis often.

If we are to rely on another lawful basis, for a specific type of processing, we will provide you with a service-specific privacy notice.

In some services, we may need to use more sensitive personal information, such as health or social care data. Where this applies, we rely on additional legal conditions under Article 9 of the UK GDPR and Schedule 1 of the Data Protection Act 2018. This is most

commonly for safeguarding, health and social care, or where there is a substantial public interest. Additional safeguards are applied to protect this information.

Children's data and high-risk processing

Some of the services that we provide involve working with children and young people or involve activities that carry a higher level of privacy risk. This includes services such as education, safeguarding and wellbeing, social care, public protection, and the use of monitoring or security systems.

While we process information about children and young people, we take extra care to protect their privacy and act in their best interests. We only collect and use this data where it is necessary to provide services, meet our legal obligations or protect individuals from harm.

For higher-risk processing, we apply additional safeguards to ensure personal information is used lawfully, fairly and securely. This may include carrying out risk assessments, limiting access to information, using secure systems, and ensuring appropriate staff training and oversight.

Why do we need your personal information?

We may need to use some information about you to:

- deliver support and services to you,
- manage those services we provide to you,
- train and manage the employment of our workers who deliver those services,
- help investigate any worries or complaints you have about your services,
- keep track of spending on services,
- check the quality of our services, and
- to help with research and planning of new services.

How the law allows us to use your personal information

There are several legal reasons why we may need to collect and use your personal information.

We collect and use personal information when it is necessary in the following circumstances:

- To fulfil our statutory obligations, such as safeguarding public health, providing social care, or collecting council tax
- To protect individuals in emergency situations
- For matters relating to employment
- To honour contracts that you have entered with us, or are considering entering
- For the management of legal cases
- To comply with legal requirements
- For archiving, research or statistical analysis
- To contribute to the public interest or benefit society as a whole

Alternatively, you may have made your information publicly available or you, or your legal representative, have given consent. If we have consent to use your personal information, you have the right to remove it at any time. If you want to remove your

consent, please contact DPO@southglos.gov.uk and tell us which service you're using so we can consider your request.

We only use what we need.

We will only collect and use your personal information for specific reasons, as listed above. If we need to retain your information for research or service planning reasons, we will remove any information that identifies you personally. This is called anonymisation or pseudonymisation.

We don't sell your personal information to anyone, the exception being via the Open Electoral Register, which you have the option to opt-out of at any time.

What are your rights?

The law gives you several rights to control the personal information we hold and use about you to provide our services.

The right to access:

You can ask for access to the information we hold about you. We would normally expect to share with you what we record about you, whenever we assess your needs or provide you with services. However, you also have the right to ask for all the information we have about you and the services you receive from us.

When we receive a request from you in writing, we must give you access to everything we've recorded about you. However, we can't let you see any parts of your record which contains:

- confidential information about other people;
- data a professional thinks will cause serious harm to your or someone else's physical or mental wellbeing; or
- if we think that giving you the information may stop us from preventing or detecting a crime.

If you ask us, we can also let others see your data (except where one of the points above applies).

If you can't ask for your records in writing, we'll make sure there are other ways that you can.

If you have any queries about access to your information please contact Customer Services on 01454 868009.

The right to rectification:

You can ask us to change information you think is inaccurate and you should always let us know if you disagree with something written on your file. We may not always be able to change or remove the information, but we'll correct factual inaccuracies and may include your comments in the record to show that you disagree with it.

Please inform us of any inaccuracies by contacting Customer Services

The right to be forgotten:

in some circumstances you can ask us to delete your personal information, for example, where:

- your personal information is no longer required for its original purpose.
- you have removed your consent for us to use your information (where there is no other legal basis for us to use it)
- there is no legal reason for the use of your information
- deleting the information is a legal requirement

Where your personal information has been shared with others, we'll do what we can to make sure those using your personal information comply with your request for it to be deleted.

Please note that we can't delete your information where:

- we are required to keep it by law,
- it is used for freedom of expression,
- it is used for public health purposes,
- it is for, scientific or historical research, or statistical purposes where it would make information unusable, or
- where it is necessary for legal claims.

The right to object

You can request to limit what we use your personal data for.

You have the right to ask us to restrict what we use your personal information for when:

- you have identified and informed us of inaccurate information held by us.
- we have no legal reason to use that information, but you want us to restrict what we use it for rather than erase the information altogether.

When information is restricted, it can't be used for any other purpose except for securely storing the data, to handle legal claims (with your consent), to protect others, or where it's for important public interests of the UK.

Where restriction of use has been granted, we'll inform you before we carry on using your personal information.

You have the right to ask us to stop using your personal information for any council service. However, if a request is approved this may cause delays or prevent us delivering that service.

Where possible we'll seek to comply with your request, but we may need to hold or use information because we are required to by law.

You can ask to have any computer made decisions explained to you, and details of how we envisage the outcomes of such decisions affecting you.

You also have the right to object if you are being 'profiled'. Profiling is where decisions are made about you based on certain things in your personal information, e.g. your health conditions.

You have the right to question decisions made about you by a computer, unless it's required for any contract you have entered into, required by law, or you've consented to it. If, and when, South Gloucestershire Council uses your personal information to profile you, to deliver the most appropriate service, you will be informed.

If you have concerns regarding automated decision making, or profiling, please contact the Data Protection Officer.

The right to portability:

You have the right to ask for your personal information to be given back to you or transferred to another service provider of your choice in a commonly used format. This is called data portability.

However, this only applies if we're using your personal information with consent (not if we're required to by law) and if decisions were made automatically by a computer and not a by an employee of the Council.

It's likely that data portability won't apply to most of the services you receive from the Council.

Who do we share your information with?

Your personal information may be provided to different organisations for various purposes. An example of this could be that the organisation is delivering services either on our behalf or together with us, another may be that the organisation can assist us with meeting our statutory duties, or we may feel that by sharing this data we are providing you with the equality of opportunity and welfare support. This may include:

- Other local authorities, including combined authorities such as WECA
- Government departments and agencies
- NHS bodies and integrated care services
- Police and law enforcement agencies
- Education and early years providers
- Commissioned service providers
- Courts and tribunals.
- Utility companies
- Local organisations who provide services to the public.

When we are sharing information with other organisations, we will have an information sharing agreement or contract in place that ensures compliance with data protection legislation. We'll often complete a Data Protection Impact Assessment (DPIA) before we begin to share personal information to identify and mitigate any risks in sharing in order to protect your privacy and comply with the law.

Sometimes we have a legal duty to provide personal information to other organisations. This is often because we need to give that data to courts, including when:

- we place a child into care;
- the court orders that we provide the information; and
- someone is taken into care under mental health law.

We may also share your personal information when we feel there is a reason that overrides protecting your privacy. This doesn't happen often, but we may share your information:

- in order to find and stop crime and fraud; or

- if there are serious risks to the public, our staff or to other professionals;
- to protect a child; or
- to protect adults who are thought to be at risk.

The risk must be serious before we can override your right to privacy.

If we're worried about your physical safety or feel we need to take action to protect you from being harmed in other ways, we'll discuss this with you and, if possible, get your permission to tell others about your situation before doing so. However, we may still share your information if we believe the risk to others is serious enough to do so.

There may also be rare occasions when the risk to others is so great that we need to share information straight away. If this is the case, we'll make sure that we record what information we share and our reasons for doing so. We'll let you know what we've done and why, if we think it is safe to do so.

We may also use your personal information if it is in your vital interests, where your life is or could be in danger. This will not happen very often, if at all, but it will help to identify and assist individuals whose vital interests are threatened, and /or who need additional support during emergencies or major incidents, for example emergency evacuation or lock-down.

Public health

We have a duty to improve the health and wellbeing of South Gloucestershire residents which includes:

- measuring the health, mortality or care needs of the population,
- planning, evaluating or monitoring health, and
- protecting or improving public health.

To help with this, we use data and information from a range of sources, including:

- data collected at the registration of a birth or death, and
- data collected by hospitals to enable us to understand more about the health and care needs in the area.

The legal basis for the sharing of this data is according to Section 42(4) of the Statistics & Registration Service Act (2007) as amended by section 287 of the Health and Social Care Act (2012) (Information relating to births and deaths) and Regulation 3 of the Health Service (Control of Patient Information) Regulations 2002 (Communicable disease and other risks to public health).

The following lawful conditions from the UK GDPR will apply:

- Article 6(1)(e) in the public interest or vested authority, and
- Article 9(2)(h) the provision of health and social care

Often this data is anonymised, which is data where key information has been removed to prevent the individual being identified. However, sometimes it needs to be fully identifiable data to enable us to understand more about the nature and causes of disease and ill-health in the area.

How do we protect your information?

We'll do what we can to make sure we hold records about you in a secure way, and we'll only make them available to those who have a right to see them. Examples of

our security include:

- Encryption - meaning that information is hidden so that it cannot be read without special knowledge (such as a password). This is done with a secret code or what's called a 'cypher'. The hidden information is said to then be 'encrypted'
- Pseudonymisation - meaning that we'll use a different name or identifier such as a number so we can hide parts of your personal information from view. This means that someone outside of the Council could work on your information for us without ever knowing it was yours.
- Controlling access to systems and networks allows us to stop unauthorised access to your data.
- Regularly training of our staff - this allows us the knowledge of how to safely handle information and how and when to report when something goes wrong.
- Routine testing of our technology and ways of working, including keeping up to date on the latest security updates (commonly called patches)

Where in the world is your information?

The majority of personal information is stored on systems within South Gloucestershire Council buildings, or it could be elsewhere in the UK where we have contracted the storage to another service provider. However, there are some occasions where your information may leave the UK either in order to get to another organisation or if the storage is not UK based.

Generally, we try to ensure that your data does not leave the European Economic Area (EEA). The EEA has the same levels of protection of your data as we do here in the UK, so we know that only sharing information within this area will normally keep your data safe.

We also have additional protections on your information if it leaves Council buildings, ranging from secure ways of transferring data to ensuring we have a robust data sharing agreement or contract in place with any third parties involved.

Rarely we may send your data outside of the EEA, but if we do, we will inform you and take all practical steps to make sure your personal information continues to be kept 'safe' according to UK and EU Government's standards. Where appropriate we'll also seek advice from the Information Commissioner's Office before doing so.

How long do we keep your personal information?

Our services will need to retain your information for as long as they are working with you. Our records retention schedule sets out how long each service will retain information when the service ends. Legislation tells us how long we need to keep some information, e.g. adoption records need to be retained for at 100 years from the date of the adoption order. However, some services only need to retain the information for a short period of time.

Anonymised information

Anonymised information is personal information that has had all the personal identifiers removed or replaced, so that a person cannot be identified. Once a service has been delivered, rather than destroying the information in accordance with our record retention schedules, we may anonymise the information about that service. This prevents individuals from being identified but allows the rest of the information about the service to be used to help us plan and improve the service in the future.

The act of anonymising personal information must comply with the Data Protection Act, for example, the process is performed securely, access limited to the officers anonymising the data and checks are made to ensure you cannot be re-identified in the future. Once personal information is anonymised, and individuals cannot be identified the information is not subject to the Data Protection Act anymore.

The anonymisation of personal information safeguards individuals' right to privacy and is a practical example of our application of the 'privacy by design' principles that data protection law promotes.

Recordings:

Where recordings are used to assist with creating official records, these recordings are deleted once their intended purpose is complete. The official record is stored in our corporate system and subject to the general retention policy. Recordings are not retained for future access. The only exception is where a disclosure is made during a recorded interaction, in which case relevant safeguarding procedures apply. You should be informed in advance of the intention to record and/or transcribe the meeting. You will also be notified at the beginning of the meeting that it is being recorded or transcribed through a "pop up" announcement in Microsoft Teams.

Where can I get advice?

If you have any worries or questions about how your personal information is handled please contact our Data Protection Officer at DPO@southglos.gov.uk.

For independent advice about data protection, privacy and data sharing issues, you can contact the Information Commissioner's Office (ICO) via their contact page or call them on 0303 123 1113.

Digital Services

To make this website easier to use, we sometimes place small text files on your device (for example your phone, tablet or laptop) called cookies. Most websites do this too.

Cookies improve things by:

- remembering your selections and data (like your address) so you don't need to re-enter them each time you visit or fill out a form.
- measuring how you use the website so we can make sure it meets your needs

By using our website, you agree that we can place these types of cookies on your device.

Our third-party suppliers may use cookies (third-party cookies) to help deliver relevant advertising on our website. These cookies do not collect any personal information. However, if you prefer you can choose to selectively opt out by following instructions at <http://www.youronlinechoices.com/uk/> or by visiting <http://optout.aboutads.info/?c=2#!/>

The Council Advertising Network is responsible for delivering advertising on the South Gloucestershire Council website. Please take a moment to read their privacy policy which includes cookie information and details on how to opt out: at [Council Advertising Network - Home](#).

Our cookies aren't used to identify you personally. They're just here to make the site work better for you. You can manage and/or delete these files as you wish. To learn more about cookies and how to manage them, visit [AboutCookies.org](https://www.aboutcookies.org)

Email marketing

We use MailChimp as our marketing automation platform. If you receive marketing emails from us, the information you provide when subscribing will be stored by MailChimp, in accordance with their Privacy Policy and Terms. You can change your mind at any time and unsubscribe.

Event booking

We use Eventbrite as our event booking platform. If you register for an event online via our Eventbrite page, the information you provide when booking will be stored by Eventbrite in accordance with their Privacy Policy and Terms.

How you use our website – Google Analytics

We use Google Analytics to collect information about how people use this site. We do this to make sure it's meeting peoples' needs and to understand how we can make the website work better. Google Analytics stores information about:

- what pages on this site you visit,
- how long you are on the site,
- how you got here, and
- what you click on while you are here.

We do not collect or store any other personal information (e.g. your name or address) so this data cannot be used to identify who you are.

We also collect data on the number of times a word is searched for and the number of failed searches. We use this information to improve access to the site and identify gaps in the content and see if it is something we should add to the site.

Unless the law allows us to, we do not share any of the data we collect about you with others, or use this data to identify individuals.

Other people's cookies

We use videos from YouTube and feeds from other websites such as Facebook and X. These websites place cookies on your device when watching or viewing these pages.

Below are links to their cookie policies:

- [Google and YouTube](#)
- [META](#) (e.g. Facebook and Instagram)
- [X](#)

Cookies for advertising - Pay Per Click

We sometimes use Google AdWords to place Pay Per Click adverts on Google search results pages. If you visit our website after clicking on one of these adverts, you will have an AdWords cookie set on your device. Anonymised data about your visit will then be

collected by Google into an anonymised set of statistics that tell us how groups of people have responded to the adverts. This data is held on Google's AdWords platform.

Turning off cookies

You can stop cookies being downloaded on to your computer or other device by selecting the appropriate settings on your browser. If you do this you may not be able to use the full functionality of this website.

There is more information about how to delete or stop using cookies on [AboutCookies.org](https://www.aboutcookies.org/). You can also opt out of being tracked by Google Analytics by installing a browser add-on.

Further guidance on the use of personal information can be found at the ICO's website at this [link](#)

Artificial intelligence

We may use artificial intelligence (AI) tools, including large language models, to support our work. These tools help with tasks such as drafting documents, summarising information, or improving efficiency. AI is used as a support tool only and does not make decisions about you. Any outputs are reviewed by a member of staff before being used. If AI is going to be used for processing your personal data, we ensure that it goes through a thorough risk assessment before any processing begins. Only approved processing activities and AI models with sufficient security standards are used within South Gloucestershire Council.

Appendices

Appendix 1 – What data do we collect?

Category	Information we may collect
Basic Personal Details	Name; address; postcode; date and place of birth; contact details (email, phone); GP surgery contact; photographs and images (including CCTV and meeting recordings); nationality and immigration status; evidence of identity and residency.
Family, Household and Relationship Information	Household composition; relationships; next of kin; emergency contacts; family network information; details of dependants and children (child ID, school, gender, eligibility for Free School Meals).
Education, Employment and Professional Information	Education and training history; employment status; employer/training provider details; professional registration numbers (e.g., Social Work England); contract and HR information (start date, role, FTE, sickness records, qualifications, absence information, leaving date and reason); trade union membership (where provided).
Health and Wellbeing Information	Physical and mental health information; medical conditions, treatments and medication; details of medical professionals; biometric and health measurements (e.g., height, weight, CO readings); pregnancy and breastfeeding status; disability and disability-related expenditure; mental capacity assessments; information needed to keep children or adults safe.
Social Care and Support Information	Social care records; assessments, plans and reviews; foster carer assessments; suitability checks; involvement with children's or adults' services; care provider details; proposed care and support arrangements.
Financial and Property Information	Income; benefits and pensions; savings and investments; bank account details; debts and outstanding payments; rent, mortgage and household expenses; tenancy or property details; funding assessments and financial eligibility evidence.
Public Office and Democratic Information (where relevant)	Register of Interests; occupation; election records; political group membership; committee memberships; outside body appointments; attendance at meetings; allowances, training, gifts and hospitality received; conduct complaints where made public.
Safety, Incident and Legal Information	Incident details; injuries; safeguarding concerns; health and safety information (including risk assessments); personal evacuation plans; criminal records and alleged offences; legal proceedings and outcomes; DBS check results.

Equalities and Demographic Information	Age; gender; ethnicity; racial origin; religion or belief; sexual orientation; language; other protected characteristics.
Communications and Interactions	Records of complaints; notes and observations from meetings or service interactions; audio recordings and transcripts (where applicable); private communications with the Council.
Unique Identifiers	NHS number; social care unique reference numbers; UPNS (Unique Pupil Number); other service-specific identifiers
Other Information Relevant to Service Delivery	Previous support accessed; referring organisation; lifestyle and social circumstances; professional opinions and decisions; any other information you choose to provide that is necessary for us to deliver services.

Appendix 2 – How we use your information.

We will use your information to provide any services you have requested, and to fulfil our statutory duties. Please see below for a full list of how we may use your information.

- To confirm your identity and address
- To carry out your requests and instructions
- To understand how you may need to use our services
- To offer you other services (including from 3rd party partner organisations) which we believe may benefit you.
- To help with family support planning
- To make applications to the Register Office, such as for certificates or correcting register entries
- To help children receive early support
- To create an official record of interactions and observations
- To use information for promotion or training purposes
- To provide tailored information you have requested
- To monitor and report on Healthy Start vitamin take-up and assess service quality
- To record service delivery, support care planning, improve services, and ensure legal compliance
- To support your care or housing needs, share updates with professionals, and evaluate pilot programmes
- To plan and improve services, prevent or detect fraud or crime, and for research
- To better protect vulnerable children and young people
- To provide and improve services for children and young people, and protect them from harm
- To support you at forums while complying with lawful requirements
- For recruitment, employment, payroll, statutory duties, staff welfare, and meeting legal obligations, including diversity and fraud prevention
- To check if you are entitled to a Diamond Travelcard
- To develop and manage workforce data, inform recruitment policies, and monitor protected characteristics under UK GDPR
- To process foster carer applications, support and pay foster carers, and ensure child safety and service quality
- To provide and improve requested services
- To administer your role as a councillor and improve services
- For tax billing and collection
- For council tax purposes
- To access services through the Families in Focus programme
- To plan and shape work with families and focus on outcomes
- To ensure smooth running of programmes
- To determine eligibility for the Holiday Activities and Food Programme, connect parents and providers, share relevant data for child safety, and manage programme funding
- To provide requested services while complying with legal requirements
- To report to health and safety authorities, improve workplace safety, and for statistical purposes
- To help with social care assessments

- To manage clients' finances as Corporate Appointee or by Court Order, including bills, benefits, and legal reporting
- To calculate your contribution towards care needs, determine entitlements, and prevent fraud
- To provide the above services while meeting legal requirements
- For insurance purposes
- To support vulnerable families facing multiple disadvantages with council involvement
- To carry out team duties, deliver services, and improve service provision
- To assess physical, mental health, learning, behavioural, and social care needs of adults and carers, and provide appropriate care
- To assess mental health needs, including Deprivation of Liberty, and provide suitable care packages
- To maintain accounts and records
- To support and manage employees
- To award and manage contracts with social care providers and ensure quality care
- To consult with service users and carers to shape the social care provider market
- To provide guidance and signposting for adult social care
- To offer a complaints service if things go wrong
- To safeguard adults at risk
- To check if you are entitled to a Blue Badge
- To administer Housing Benefit and Discretionary Housing Payments
- To check eligibility for Housing Benefit, Discretionary Payments, and Council Tax Reduction, and to plan future services
- To provide the Bikeability service
- To provide survey answers to third party organisations and government officials for improving service delivery or to meet a legal obligation.

We also use your personal information to provide you with:

- **Cemeteries services**, including burial records, plot management and responding to enquiries
- **Economic development support**, such as business advice, funding opportunities and local growth initiatives
- **Environmental enforcement services**, including investigations into fly-tipping, waste offences and nuisance issues
- **Environmental health services**, such as food safety, pollution control, housing standards and public health protection
- **Fleet management and garage services**, including vehicle maintenance, safety checks and service requests
- **Support with flooding or drainage problems**, including investigations, repairs and updates on reported issues
- **Grant application and award services**, to assess eligibility, process applications and administer funding
- **Heritage project activities**, including participation, volunteering, events and project updates
- **Highway asset management services**, including inspections, maintenance and repairs of road assets

- **Kingswood Park surveys and engagement**, to gather views, analyse feedback and improve the park
- **Legacy lifts services**, including maintenance, safety checks and responding to service requests
- **Licensing services**, to process, issue and manage licences for individuals, premises or vehicles
- **Local self-build and custom-build register services**, to understand demand and support planning policy
- **Museums and heritage services**, including event bookings, visitor engagement and collection management
- **Partnership engagement**, including consultations, joint projects and community involvement
- **Pest control services**, including booking visits, carrying out treatments and providing advice
- **Planning policy engagement**, including consultations, updates and involvement in local planning processes
- **Private sector housing services**, such as property inspections, enforcement, grants and landlord/tenant support
- **Reporting and resolving problems with roads, footpaths or cycleways**, including investigations and repairs
- **The Viewpoint Panel**, to manage your participation in surveys, consultations and research activities
- **Adult social care and support services**, including assessments, care planning, reviews, safeguarding, and ongoing support
- **Services for reporting problems in your area**, including issues with bollards, bus stops or shelters, road or street name signs, roads, footpaths, cycleways, streetlights, zebra crossings, flooding or drainage
- **The community meals service**, including eligibility checks, meal delivery arrangements and service updates