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MEETING OF FULL PARISH COUNCIL

HELD ON MONDAY 20th APRIL 2026 AT 7.30PM

Councillors Present : Cllrs Norcross {Chairman}, Hanson, Sharp, Foxwell, Johnson, S Alexander, Bell, Campbell Young, Trundle and Ballance.
Clerks in attendance : John Fullbrook.
Members of the Public : **8 {inc. District Cllrs Victoria Finnegan and Nicholas Marks}**
Meeting commenced : **7.32 pm**

DRAFT MINUTES

ACTION

FULL/25/112 **APOLOGIES FOR ABSENCE**

112.1 Apologies were received from Cllrs Linfield, M Alexander, I Alexander and Lloyd.

FULL/25/113 **DECLARATIONS OF INTEREST**

113.1 Cllr Campbell declared an interest in Agenda item 8.1 and would leave the room for the duration of the debate and suggested the Clerk did so too. The Chair saw no reason for the Clerk to leave the room. Cllr Campbell also stated he would be leaving the meeting for personal reasons subsequent to agenda item 8.6.

FULL/25/114 **QUESTIONS FROM THE FLOOR {in summary}**

114.1.1 ***Q –*** *On the 5th March 26, the External Auditors sent a report to Steyning Parish Council following my three formal objections - 2 of which were about financial regulations and the 3rd concerning SPC not undertaking an Equality Impact Assessment on equipment installations at Chandlers Way play area. I've looked online and there is no copy of the report uploaded. There is only a different document dated 27 March to be discussed under agenda item 8.6.1 this evening. Can you please explain when the Council is going to discuss the 5th March report as the auditors have required?*

114.1.2 ***Response - The Chair stated that she was going to defer item 8.6 until the next suitable Full Council meeting and it is at that point that it will be discussed.*** **CLERK**

FULL/25/115 **MINUTES OF PREVIOUS MEETING**

115.1 Cllr Norcross **proposed, seconded** by Cllr Foxwell that the minutes for the meeting dated the 16th February 2026 be accepted as a true and fair record. **Agreed. 10 For, 1 Against.**

FULL/25/116 **MATTERS ARISING – These items were taken as read**

116.1 19th January Full Council meeting minutes amended and published – **Actioned**

116.2 SPC Meeting Calendar to be published – **Actioned**

116.3 Amended SPC Website Privacy policy published **– Actioned**

116.4 SPC Accessibility Statement published **– Actioned**

116.5 Draft IT Policy amended, and final version published – **Actioned**

116.6 SPC Social media policy superseded by IT Policy, and so removed from circulation **– Actioned**

116.7 Clerk to go back to Logo designer once more and ask for minor changes and then bring back**- Item 119.8**

116.8 D. Clerk to proceed with gaining permissions for Centre front door installation **– Actioned**

116.9 SPC Chairs to submit Committee reports to SPC Chair before APM **– Actioned**

116.10 Clerk to confirm to WSCC Highways that Railings project will receive SPC match funding **– Actioned**

116.11 Clerk to convey thanks for Steyning Society offer for match funding for railings **– Actioned**

116.12 D. Clerk to publish 'Have your Say' themed CCTV publicity – **Actioned**

116.13 Cllr Campbell to provide an apology to Council and Clerk **– See item 119.1**

116.14 Clerk to arrange if possible the restriction of email access to external sources for Cllr Campbell, when using .gov Council address – **See item 119.2**

116.15 Swimming pool discussion relating to Devolution taken be to F&GP – **Actioned**

116.16 SDNP & HALC meeting attendance by Cllr Lloyd **– Actioned / Items 120**

116.17 Cllr Linfield informed re agreed 'Leave of Absence' **– Actioned**

116.18 Lead Youth Worker position to be made Full Time **– Actioned**

FULL/25/117 NEIGHBOURHOOD WARDENS REPORT

117.1 Members received the Wardens reports for February and March 2026. They had been distributed previously and there were no items discussed. Members complimented the authors on their work, and the Clerk will inform the Wardens regards these comments. **CLERK**

FULL/25/118 REPORT FROM DISTRICT COUNCILLORS ***(In Summary)***

118.1 **Cllr Victoria Finnegan – (HDC) update**
1. New planning rules – HDC have responded to the governments proposed national scheme of delegation. This includes draft guidance and new legislation. The government hopes to have the full scheme in place by September 2026.

118.2 **2. Local Government reorganisation -** The government issued an update on March 25th**.** There is no decision on the unitary solution, but a new consultation explores two variations. First modification is moving Chichester District Council into a unitary with Crawley BC, HDC, and Mid Sussex. Leaving a second unitary in West Sussex comprising Arun DC, Adur DC and Worthing BC. The second modification sees movement of Falmer, Peacehaven and Saltdean wards from Lewes DC into Brighton and Hove. The timescale remains the same however, with 1st April 2028 as Vesting day.

118.3 **3. Local Plan** – The new examiner starts hearings this week {April 21st to 23rd} New housing numbers will be discussed.

118.4 **4. Governance Review** – The review was launched in February. First consultation runs from May to June 26 with SPC needing to provide feedback, then HDC consider outcomes and draft recommendations, then local electors are involved with final consultation between August and September 26. Any changes to Parish Council boundaries should be enforced 1st April 27, and then Councillor elections based on these changes in May 27.

118.5 **5. Newmans Gardens Car Park redevelopment –** The tender docs for potential contractors distributed in next two weeks. Works should commence 8 to 12 weeks after responses

118.6 **6. Tanyard Lane road repairs** – HDC property team have inspected them and contractors to be approved shortly.

118.7 **7. High St Wi-Fi –** The civil works are due to be completed before end of this year, with equipment installed and services up and running from August 2027.

118.8 **8. Glebe Fields development –** See bullet points

- Heras fencing has been erected on site to protect site, tree and hedges
- Ongoing major archaeological works, complaints being reviewed by HDC concerning early starts and large lorry movements along Kings Barn Lane
- First 'on site' meeting with residents, Vistry, Victoria, and SPC reps discussed boundary concerns
- Western boundary concerns discussed re tree/hedge screen removal
- Design to pedestrian ramp adjacent roundabout construction not yet finalised, but foliage removed anyway leaving residents feeling their properties are exposed
- Archaeological dig to be completed by October 26. Phase 1 build can start before this dig is completed as in differing locations
- Initial A283 diversion will take 2 weeks and due to start in early May
- Roundabout to be completed by end of August
- Number 37 KBL now not being demolished until late 2029, as will be used as site managers office
- Notes from the meeting via Newgate/ Vistry are yet to be distributed

118.9 **9. Cllr Questions –** No questions raised

118.10 **Cllr Nicholas Marks –** Nick talked in support of the District Partnerships Vintage Rally event on the High Street and asked for Cllrs support for potential conversations and interviews to be staged at the Bus Shelter.

FULL/25/119 GOVERNANCE AND FINANCE MATTERS

119.1 **Subsequent to a Councillors unsuccessful challenge to the HDC Sanctions procedure against him, will the Councillor now apologise to the Council and the Clerk for his behaviour.** **CLERK**
Cllr Campbell once again refused to apologise to Council and Clerk, continuing to contest that though the HDC Steering Committee and subsequent Hearings found that he had been bullying for a considerable period of time, he believed himself not to be a bully.

Cllr Campbell left the meeting at this point

119.2 **Having received a response from the Barristers, the formal legal advice states that there may be a viable claim for a civil injunction against Cllr Campbell's poor behaviour, SPC to decide whether given the likely costs involved, the matter is pursued.** **Cllr Norcross**

119.2.1 The Clerk made a statement attempting to give a balanced viewpoint in terms of the Council's fiscal responsibility, when dealing with sums of up to £50K worth of taxpayer's money.

119.2.2 The Chair further presented the case for either proceeding or not to do so, and some of the potential consequences involved, especially whilst offensive, vindictive and bullying emails are still forthcoming, and that things would likely get worse if nothing was done.

119.2.3 The debate continued for some time with all the other Councillors present giving their individual viewpoints, with all members trying to balance the difficulties of this unenviable position. The particular difficulty was reconciling potential agreement to such an open-ended financial commitment, with no guarantee of complete resolution, yet knowing that seemingly every other course of action has already been attempted.

119.2.4 Cllr Hanson **proposed, seconded** by Cllr Bell that SPC present additional material to assist the Barristers in advising SPC on the probability of a successful case, but with the imposition of a maximum financial allocation, not to exceed £10,000. **Agreed**

Cllr Campbell returned to the meeting, but then gave his apologies and left for the remainder

119.3 **To agree convening of the Personnel Committee, and the items to be discussed**
There was a complaint email needing to be dealt with, and the Chair wanted to present a case for modifying the Clerk's job title, whilst maintaining his role and responsibilities. **CLERK**
Cllr Young **proposed, seconded** by Cllr Norcross that SPC convene the Personnel Committee to progress dealing with a complaint received {by a resident} and any other essential Personnel matters. **Agreed**

119.4 **To agree recommendations from the N. Plan Steering Committee regarding the Grammar School planning application.** **CLERK**

119.4.1 The Planning and Premises committee had delegated responsibility to the N. Plan Steering Committee to consider the details of the planning application, and over a number of meetings culminating in a discussion on the evening of the 15th April, the group agreed upon three recommendations for SPC to action. Two proposed to be sent as comments to HDC in relation to SPC being a consultee within the process, the third to be actioned by the Clerk on behalf of the Council.

With reference to DC/26/0322 – *Steyning Grammar School - Part-demolition of existing teaching buildings, MUGAs and all-weather pitch. Construction of replacement 2-storey and 3-storey teaching buildings, flood-lit all-weather pitch and hard surfaced sports courts, with associated access, parking, landscaping and infrastructure.*

………..

119.4.2 Cllr Norcross **proposed, seconded** by Cllr S Alexander that the recommendations be approved as per supporting paper 8.4. **Agreed**

As Follows:-

Objection *– Steyning Parish Council {SPC} remain concerned about the loss of sports amenity, namely the AstroTurf pitch, and also the apparent divergence in terms of proposed future community use management between the School and the adjacent Sports Centre, which remove the use of sports hall amenity from the sports centres control and places it under School lettings which may well render the sports centre a non-viable commercial operation leading to the further loss of amenity in the future – namely the swimming pool.*

Cllr Bell ***proposed, seconded*** *by Cllr Hanson that an astroturf or equivalent pitch be incorporated into the existing development plans (using part of the existing and extensive grass playing area, even if the installation is initially unfunded, and whilst SPC pursues potential match funding options through Sport England), and that SPC be part of the conversation concerning the Community Use Agreement to ensure Access and Security measures be revisited before signing off on the final plans.* ***Agreed***

Cllr Bell ***proposed, seconded*** *by Cllr Simon Alexander that West Sussex County Council explore options for the reprofiling of the road layout adjacent the new main school access on Horsham Road to improve pedestrian safety (as there will be considerably more pupils using a very narrow pathway next to a very busy road), and to consider moving the current Bus Stops to again deal with safety concerns. With consideration of traffic management measures where appropriate. Engagement with the highway authority engineers and the school being required at the earliest opportunity.* ***Agreed***

119.4.3 And for SPC:-

Cllr Bell ***proposed, seconded*** *by Cllr Simon Alexander that the Parish Council contact Sport England to make its case regarding retention of community sports access and existing levels of provision.* ***Agreed*** **CLERK**

119.5 **Reminder regards timely response regarding Committee preferences in advance of the SPC Annual Parish Council Meeting.** The Chair and Clerk presented a copy of the previous year's form which Cllrs complete to give their preferences for committee and outside representation. This year members were asked simply to respond by the 14th May if they wanted to amend their requests from the previous year **CLERK**

119.6 **Members to consider the External Audit Report response, and subsequent F&GP recommendations.** This item deferred – see point FULL/25/114.1 **CLERK**

119.7 **To receive an update concerning Glebe Fields development {in addition to the report from Cllr Finnegan noted under point 118.8}**

119.7.1 The Clerk and Cllr Bell added that items recovered from the current archaeological dig would be taken to the Steyning Museum; that it was so much easier to hold the developers to account when all parties were holding the same documents with detailed drawings of boundary specifications, and that this was mainly thanks to Cllr Finnegans persistence and the agreements from the Steering Committee in getting these matters approved during the consultation process; and that there were to be regular monthly meetings involving the site management team and SPC representatives to ensure the development was being overseen correctly and in line with planning consents.

119.7.2 The Site manager also stated that the onsite workers canteen service operator had yet to be appointed, and it was suggested the Clerk's office publicise this opportunity for a local operator. **CLERK**

119.8 **To further consider a new Steyning Town Council Emblem/Logo, and make a final agreement**

119.8.1 Members considered an amended/ improved Council Logo over a number of meetings. Following the February Full Council meeting, there were only minor amendments called for and subsequent to these being completed it remained for members to consider different fonts, and the level of detail required for the drawings, and this meant that they were having to review only 6 final options.

119.8.2 Cllr Norcross **proposed, seconded** by Cllr S Alexander that SPC were in favour of option 1, 'more detailed version'. **Agreed** **CLERK**

119.8.3 Cllr Norcross **proposed, seconded** by Cllr Sharp that the Clerk invites the winning emblem designer to the next Full Council meeting and present her with a bunch of flowers and bottle of wine by way of a thank you. **Agreed** **CLERK**

FULL/25/120 **REPORTS FROM OUTSIDE BODIES**

120.1 **Cllrs Hanson & Young – Isolation and Loneliness/ PPG** – Cllr Young tabled a summary of the last PPG meeting on the 18th March, as follows;

The committee expressed their appreciation for the grant from SPC to cover the cost of the hire of the Steyning Centre for their future event on the prevention of falls.

120.1.1 The Medical Practice are keen for patients to use technology to book appointments and seek advice and propose to run some walk-in sessions to help people to do this. The biggest potential advantage is to speed up the processing of prescriptions and for patients to access their test results. At the moment 50% of system online requests are filled in by reception staff on behalf of patients.

120.1.2 The problem of insufficient disabled parking spaces was discussed, and it was resolved to contact National Health Services re increasing these. The reply stated that as this is a relatively small site with very limited space, and that there was no practical scope to alter the configuration of the car park or increase provision beyond what is already in place. They assured that if circumstances changed in the future and opportunities to improve the number of disabled spaces, SPC would be engaged in discussions. It was acknowledged that Victoria Finnegan (HDC Councillor) has been very supportive with this issue.

120.1.3 The Chair of the PPG, Lesley Humber, reminded all that this was her last meeting as Chair. William Payne agreed to act as interim Chair until a formal appointment was made. The committee will need to manage and plan for the additional activity that will result.

120.1.4 The Horsham District Older Peoples Forum are holding a meeting on Tuesday April 21st.

120.2	**Cllrs Johnson – Climate Action Group**. – The minutes from the groups last meeting had been distributed as a supporting paper and Cllr Johnson briefly summarised the points raised. Also distributed was a promotional note concerning the film 'The People's Emergency Briefing' which was to be shown at the Steyning Centre on the 24th June. Vicci reported that the film comprised many short features concerning the Climate Crisis, while on the positive side also discussed potential solutions and she recommended its viewing.	**CLERK**
120.3	**Cllr S Alexander – Joint Parishes Youth Committee –** Cllr S Alexander reported on the March monthly youth service report and the document was widely praised by those members present. Indeed it was suggested the content was potentially too detailed for a monthly production and that it might be best that this sort of detail be reserved for the quarterly report, with a one page update covering the salient points being more relevant and achievable. Simon also informed members of the Lead Youth Worker's gaining a distinction grade for her Level 3 Youth Service course, and this was also appreciated by members.	**CLERK**
120.4	**Cllrs Norcross and Lloyd – HALC Update** – The Clerk distributed the comprehensive and informative minutes from the 25th February Zoom meeting, which covered many important points including the NPPF planning reforms; the subsequent shift to fewer planning applications going to committee and with parish power depending on well-reasoned planning compliant responses; plus HDC Asset transfers needing a proactive Parish approach.	**CLERK**
120.5	**Cllr Lloyd – SDNP update** – Cllr Lloyd not in attendance	
FULL/25/121	**COMMUNITY MATTERS**	
121.1.1	**Update concerning the response to the CCTV consultation, and to agree recommendations from the F&GP Committee.**	**CLERK**
121.1.2	Cllrs S Alexander and Sharp summarised the results of the consultation, which had produced overwhelming support for the CCTV installation with nearly 80% in favour of the 5 questions proposed. F&GP had already agreed to the distribution and promotion of the results, and now it remained for SPC to approve of F&GP's recommendation for progress towards installation. Cllr Sharp **proposed, seconded** by Cllr Alexander that following the results of the consultation, Full Council agree to take this project forward and progress with {the working party} getting a quote for the works to be completed. **Agreed**	**CLERK**
FULL/25/122	**NOTIFICATION OF ONGOING ITEMS - To receive items which will be taken to next meeting**	
122.1	Chair & Clerk to speak with representatives to discuss parish wide disability awareness & bring back Full Council	
122.2	Youth service team to make future presentation to SPC Full Council	
122.3	Clerk to organise meetings with school to discuss Community Use Agreement	
122.4	SPC to convene the Emergency Planning working party	
122.5	NPPF updated Docs to be discussed by N. Plan Steering Committee	
122.6	Each Chairman to consider summarising committee's work during receipt of minutes process	
122.7	SPC to become a Town Council in May 2026	
122.8	To meet representatives from Lassay-les-Chateaux and convene a working party to discuss potential twinning idea	
122.9	Data protection training to be arranged for Cllrs and Staff	
FULL/25/123	**CORRESPONDENCE AND INFORMATION ITEMS**	
123.1	The Clerk had distributed & published items concerning the annual Downs Link hedge cutting dates; a Carbon literacy training course; and the commencement date for the Community Governance Review - 9th May to 22 June.	
FULL/25/109	**DATE OF THE NEXT FULL COUNCIL MEETING: 18th MAY 2026 at 7.30pm**	

Meeting closed at 9.30pm

Signed by the Chairman ………………………………………… Date 18th May 2026

A recording of this meeting is available at - https://youtu.be/ekFVhIt32tc

Parish Clerk: John Fullbrook **Email: clerk@steyningpc.gov.uk**
Deputy Clerk: Leanne Poole **Email: leanne.poole@steyningpc.gov.uk**

STEYNING TOWN COUNCIL

STANDING ORDERS

Adopted by Full Council on 18th May 2026

INTRODUCTION

These model standing orders update the National Association of Local Council (NALC) model standing orders contained in “Local Councils Explained” by Meera Tharmarajah (© 2013 NALC). This publication contains new model standing orders which reference new legislation introduced after 2013 when the last model standing orders were published.

HOW TO USE MODEL STANDING ORDERS

Standing orders are the written rules of a local council. Standing orders are essential to regulate the proceedings of a meeting. A council may also use standing orders to confirm or refer to various internal organisational and administrative arrangements. The standing orders of a council are not the same as the policies of a council but standing orders may refer to them.

Local councils operate within a wide statutory framework. NALC model standing orders incorporate and reference many statutory requirements to which councils are subject. It is not possible for the model standing orders to contain or reference all the statutory or legal requirements which apply to local councils. For example, it is not practical for model standing orders to document all obligations under data protection legislation. The statutory requirements to which a council is subject apply whether or not they are incorporated in a council’s standing orders.

The model standing orders do not include model financial regulations. Financial regulations are standing orders to regulate and control the financial affairs and accounting procedures of a local council. The financial regulations, as opposed to the standing orders of a council, include most of the requirements relevant to the council’s Responsible Financial Officer. Model financial regulations are available to councils in membership of NALC.

DRAFTING NOTES

Model standing orders that are in bold type contain legal and statutory requirements. It is recommended that councils adopt them without changing them or their meaning. Model standing orders not in bold are designed to help councils operate effectively but they do not contain statutory requirements so they may be adopted as drafted or amended to suit a council’s needs. It is NALC’s view that all model standing orders will generally be suitable for councils.

For convenience, the word “councillor” is used in model standing orders and, unless the context suggests otherwise, includes a non-councillor with or without voting rights.

A model standing order that includes brackets like this ‘(   )’ requires information to be inserted by a council. A model standing order that includes brackets like this ‘[ ]’ and the term ‘OR’ provides alternative options for a council to choose from when determining standing orders.

1. RULES OF DEBATE AT MEETINGS

a Motions on the agenda shall be considered in the order that they appear unless the order is changed at the discretion of the chairman of the meeting.

b A motion (including an amendment) shall not be progressed unless it has been moved and seconded.

c A motion on the agenda that is not moved by its proposer may be treated by the chairman of the meeting as withdrawn.

d If a motion (including an amendment) has been seconded, it may be withdrawn by the proposer only with the consent of the seconder and the meeting.

e An amendment is a proposal to remove or add words to a motion. It shall not negate the motion.

f If an amendment to the original motion is carried, the original motion (as amended) becomes the substantive motion upon which further amendment(s) may be moved.

g An amendment shall not be considered unless early verbal notice of it is given at the meeting and, if requested by the chairman of the meeting, is expressed in writing to the chairman.

h A councillor may move an amendment to his own motion if agreed by the meeting. If a motion has already been seconded, the amendment shall be with the consent of the seconder and the meeting.

i If there is more than one amendment to an original or substantive motion, the amendments shall be moved in the order directed by the chairman of the meeting.

j Subject to standing order 1(k), only one amendment shall be moved and debated at a time, the order of which shall be directed by the chairman of the meeting.

k One or more amendments may be discussed together if the chairman of the meeting considers this expedient but each amendment shall be voted upon separately.

l A councillor may not move more than one amendment to an original or substantive motion.

m The mover of an amendment has no right of reply at the end of debate on it.

n Where a series of amendments to an original motion are carried, the mover of the original motion shall have a right of reply either at the end of debate on the first amendment or at the very end of debate on the final substantive motion immediately before it is put to the vote.

o Unless permitted by the chairman of the meeting, a councillor may speak once in the debate on a motion except:

i. to speak on an amendment moved by another councillor;

ii. to move or speak on another amendment if the motion has been amended since he last spoke;

iii. to make a point of order;

iv. to give a personal explanation; or

v. to exercise a right of reply.

p During the debate on a motion, a councillor may interrupt only on a point of order or a personal explanation and the councillor who was interrupted shall stop speaking. A councillor raising a point of order shall identify the standing order which he considers has been breached or specify the other irregularity in the proceedings of the meeting he is concerned by.

q A point of order shall be decided by the chairman of the meeting and his decision shall be final.

r When a motion is under debate, no other motion shall be moved except:

i. to amend the motion;

ii. to proceed to the next business;

iii. to adjourn the debate;

iv. to put the motion to a vote;

v. to ask a person to be no longer heard or to leave the meeting;

vi. to refer a motion to a committee or sub-committee for consideration;

vii. to exclude the public and press;

viii. to adjourn the meeting; or

ix. to suspend particular standing order(s) excepting those which reflect mandatory statutory or legal requirements.

s Before an original or substantive motion is put to the vote, the chairman of the meeting shall be satisfied that the motion has been sufficiently debated and that the mover of the motion under debate has exercised or waived his right of reply.

t Excluding motions moved under standing order 1(r), the contributions or speeches by a councillor shall relate only to the motion under discussion and shall not exceed (2) minutes without the consent of the chairman of the meeting.

2. DISORDERLY CONDUCT AT MEETINGS

a No person shall obstruct the transaction of business at a meeting or behave offensively or improperly. If this standing order is ignored, the chairman of the meeting shall request such person(s) to moderate or improve their conduct.

b If person(s) disregard the request of the chairman of the meeting to moderate or improve their conduct, any councillor or the chairman of the meeting may move that the person be no longer heard or be excluded from the meeting. The motion, if seconded, shall be put to the vote without discussion.

c If a resolution made under standing order 2(b) is ignored, the chairman of the meeting may take further reasonable steps to restore order or to progress the meeting. This may include temporarily suspending or closing the meeting.

3. MEETINGS GENERALLY

Full Council meetings ●
Committee meetings ●
Sub-committee meetings ●

● a **Meetings shall not take place in premises which at the time of the meeting are used for the supply of alcohol, unless no other premises are available free of charge or at a reasonable cost.**

● b **The minimum three clear days for notice of a meeting does not include the day on which notice was issued, the day of the meeting, a Sunday, a day of the Christmas break, a day of the Easter break or of a bank holiday or a day appointed for public thanksgiving or mourning.**

● c The minimum three clear days' public notice of a meeting does not include the day on which the notice was issued or the day of the meeting.

● ● d **Meetings shall be open to the public unless their presence is prejudicial to the public interest by reason of the confidential nature of the business to be transacted or for other special reasons. The public's exclusion from part or all of a meeting shall be by a resolution which shall give reasons for the public's exclusion.**

e Members of the public may make representations, ask and answer questions and give evidence, at a meeting which they are entitled to attend.

f The period of time designated for public participation at a meeting in accordance with standing order 3(e) shall not exceed (15) minutes unless directed by the chairman of the meeting.

g Subject to standing order 3(f), a member of the public shall not speak for more than (2) minutes.

h In accordance with standing order 3(e), a question shall not require a response at the meeting nor start a debate on the question. The chairman of the meeting may direct that a written or oral response be given.

i A person shall raise his hand when requesting to speak.

j A person who speaks at a meeting shall direct his comments to the chairman of the meeting.

k Only one person is permitted to speak at a time. If more than one person wants to speak, the chairman of the meeting shall direct the order of speaking.

● ● l **Subject to standing order 3(m), a person who attends a meeting is permitted to report on the meeting whilst the meeting is open to the public. To "report" means to film, photograph, make an audio recording of meeting proceedings, use any other means for enabling persons not present to see or hear the meeting as it takes place or later or to report or to provide oral or written commentary about the meeting so that the report or commentary is available as the meeting takes place or later to persons not present.**

● ● m **A person present at a meeting may not provide an oral report or oral commentary about a meeting as it takes place without permission.**

● ● n **The press shall be provided with reasonable facilities for the taking of their report of all or part of a meeting at which they are entitled to be present.**

● o **Subject to standing orders which indicate otherwise, anything authorised or required to be done by, to or before the Chairman of the Council may in his absence be done by, to or before the Vice-Chairman of the Council (if there is one).**

● p **The Chairman of the Council, if present, shall preside at a meeting. If the Chairman is absent from a meeting, the Vice-Chairman of the Council (if there is one) if present, shall preside. If both the Chairman and the Vice-Chairman are absent from a meeting, a councillor as chosen by the councillors present at the meeting shall preside at the meeting.**

● ● ● q **Subject to a meeting being quorate, all questions at a meeting shall be decided by a majority of the councillors and non-councillors with voting rights present and voting.**

● ● ● r **The chairman of a meeting may give an original vote on any matter put to the vote, and in the case of an equality of votes may exercise his casting vote whether or not he gave an original vote.**

See standing orders 5(h) and (i) for the different rules that apply in the election of the Chairman of the Council at the annual meeting of the Council.

● s **Unless standing orders provide otherwise, voting on a question shall be by a show of hands. At the request of a councillor, the voting on any question shall be recorded so as to show whether each councillor present and voting gave his vote for or against that question.** Such a request shall be made before moving on to the next item of business on the agenda.

t The minutes of a meeting shall include an accurate record of the following:

i. the time and place of the meeting;

ii. the names of councillors who are present and the names of councillors who are absent;

iii. interests that have been declared by councillors and non-councillors with voting rights;

iv. the grant of dispensations (if any) to councillors and non-councillors with voting rights;

v. whether a councillor or non-councillor with voting rights left the meeting when matters that they held interests in were being considered;

vi. if there was a public participation session; and

vii. the resolutions made.

● ● ● u **A councillor or a non-councillor with voting rights who has a disclosable pecuniary interest or another interest as set out in the Council's code of conduct in a matter being considered at a meeting is subject to statutory limitations or restrictions under the code on his right to participate and vote on that matter.**

● v **No business may be transacted at a meeting unless at least one-third of the whole number of members of the Council are present and in no case shall the quorum of a meeting be less than three.**

See standing order 4d(viii) for the quorum of a committee or sub-committee meeting.

w **If a meeting is or becomes inquorate no business shall be transacted** and the meeting shall be closed. The business on the agenda for the meeting shall be adjourned to another meeting.

x A meeting shall not exceed a period of (2.5) hours.

4. COMMITTEES AND SUB-COMMITTEES

a **Unless the Council determines otherwise, a committee may appoint a sub-committee whose terms of reference and members shall be determined by the committee.**

b **The members of a committee may include non-councillors unless it is a committee which regulates and controls the finances of the Council.**

c **Unless the Council determines otherwise, all the members of an advisory committee and a sub-committee of the advisory committee may be non-councillors.**

d The Council may appoint standing committees or other committees as may be necessary, which will include the following standing committees plus Neighbourhood Plan Steering Committee and the maximum membership for each

Community Committee – 9 Councillors with a quorum of 4 Councillors

Planning and Premises Committee – 8 Councillors with a quorum of 3 Councillors

Neighbourhood Plan Steering Committee – 8 Councillors and 4 Unelected members with a quorum of 5 members, of which no fewer than 3, must be STC Cllrs.

Finance and General Purposes Committee – 9 Councillors including the Chair of the Council, Chair of Community and Chair of Planning and Premises. With a quorum of 4 councillors.

The Council:-

i. shall determine the number and time of the ordinary meetings of a standing committee up until the date of the next annual meeting of the Council;

ii. shall permit a committee, other than in respect of the ordinary meetings of a committee, to determine the number and time of its meetings;

iii. shall, subject to standing orders 4(b) and (c), appoint and determine the terms of office of members of such a committee;

iv. may, subject to standing orders 4(b) and (c), appoint and determine the terms of office of the substitute members to a committee whose role is to replace the ordinary members at a meeting of a committee if the ordinary members of the committee confirm to the Proper Officer before the meeting that they are unable to attend;

v. shall, after it has appointed the members of a standing committee, appoint the chairman of the standing committee;

vi. shall permit a committee other than a standing committee, to appoint its own chairman at the first meeting of the committee;

vii. shall determine the place, notice requirements and quorum for a meeting of a committee (see above) and a sub-committee which, shall be no fewer than three.

viii. shall determine if the public may participate at a meeting of a committee;

ix. shall determine if the public and press are permitted to attend the meetings of a sub-committee and also the advance public notice requirements, if any, required for the meetings of a sub-committee;

x. shall determine if the public may participate at a meeting of a sub-committee that they are permitted to attend; and

xi. may dissolve a committee or a sub-committee.

5. ORDINARY COUNCIL MEETINGS

a **In an election year, the annual meeting of the Council shall be held on or within 14 days following the day on which the councillors elected take office.**

b **In a year which is not an election year, the annual meeting of the Council shall be held on such day in May as the Council decides.**

c **If no other time is fixed, the annual meeting of the Council shall take place at 6pm.**

d **In addition to the annual meeting of the Council, at least three other ordinary meetings shall be held in each year on such dates and times as the Council decides.**

e **The first business conducted at the annual meeting of the Council shall be the election of the Chairman and Vice-Chairman (if there is one) of the Council.**

f **The Chairman of the Council, unless he has resigned or becomes disqualified, shall continue in office and preside at the annual meeting until his successor is elected at the next annual meeting of the Council.**

g **The Vice-Chairman of the Council, if there is one, unless he resigns or becomes disqualified, shall hold office until immediately after the election of the Chairman of the Council at the next annual meeting of the Council.**

h **In an election year, if the current Chairman of the Council has not been re-elected as a member of the Council, he shall preside at the annual meeting until a successor Chairman of the Council has been elected. The current Chairman of the Council shall not have an original vote in respect of the election of the new Chairman of the Council but shall give a casting vote in the case of an equality of votes.**

i **In an election year, if the current Chairman of the Council has been re-elected as a member of the Council, he shall preside at the annual meeting until a new Chairman of the Council has been elected. He may exercise an original vote in respect of the election of the new Chairman of the Council and shall give a casting vote in the case of an equality of votes.**

j Following the election of the Chairman of the Council and Vice-Chairman (if there is one) of the Council at the annual meeting, the business shall include:

i. **In an election year, delivery by the Chairman of the Council and councillors of their acceptance of office forms unless the Council resolves for this to be done at a later date. In a year which is not an election year, delivery by the Chairman of the Council of his acceptance of office form unless the Council resolves for this to be done at a later date;**

ii. Confirmation of the accuracy of the minutes of the last meeting of the Council;

iii. Receipt of the minutes of the last meeting of a committee;

iv. Consideration of the recommendations made by a committee;

v. Review of delegation arrangements to committees, sub-committees, staff and other local authorities;

vi. Review of the terms of reference for committees;

vii. Appointment of members to existing committees;

viii. Appointment of any new committees in accordance with standing order 4;

ix. Review and adoption of appropriate standing orders and financial regulations;

x. Review of arrangements (including legal agreements) with other local authorities, not-for-profit bodies and businesses.

xi. Review of representation on or work with external bodies and arrangements for reporting back;

xii. In an election year, to make arrangements with a view to the Council becoming eligible to exercise the general power of competence in the future;

xiii. Review of inventory of land and other assets including buildings and office equipment;

xiv. Confirmation of arrangements for insurance cover in respect of all insurable risks;

xv. Review of the Council's and/or staff subscriptions to other bodies;

xvi. Review of the Council's complaints procedure;

xvii. Review of the Council's policies, procedures and practices in respect of its obligations under freedom of information and data protection legislation (*see also standing orders 11, 20 and 21*);

xviii. Review of the Council's policy for dealing with the press/media;

xix. Review of the Council's employment policies and procedures;

xx. Review of the Council's expenditure incurred under s.137 of the Local Government Act 1972 or the general power of competence.

xxi. Determining the time and place of ordinary meetings of the Council up to and including the next annual meeting of the Council.

6. EXTRAORDINARY MEETINGS OF THE COUNCIL, COMMITTEES AND SUB-COMMITTEES

a **The Chairman of the Council may convene an extraordinary meeting of the Council at any time.**

b **If the Chairman of the Council does not call an extraordinary meeting of the Council within seven days of having been requested in writing to do so by two councillors, any two councillors may convene an extraordinary meeting of the Council. The public notice giving the time, place and agenda for such a meeting shall be signed by the two councillors.**

c The chairman of a committee [or a sub-committee] may convene an extraordinary meeting of the committee [or the sub-committee] at any time.

d If the chairman of a committee [or a sub-committee] does not call an extraordinary meeting within (3) days of having been requested to do so by

e (2) members of the committee [or the sub-committee], any (2) members of the committee [or the sub-committee] may convene an extraordinary meeting of the committee [or a sub-committee].

7. PREVIOUS RESOLUTIONS

a A resolution shall not be reversed within six months except either by a special motion, which requires written notice by at least (8) councillors to be given to the Proper Officer in accordance with standing order 9, or by a motion moved in pursuance of the recommendation of a committee or a sub-committee.

b When a motion moved pursuant to standing order 7(a) has been disposed of, no similar motion may be moved for a further six months.

c This standing order does not apply to decisions made in the six months prior to polling day in an election year.

8. VOTING ON APPOINTMENTS

Where there are more persons nominated and prepared to stand for a position than there are places available, then each councillor will have available to them the number of votes as per the number of places, e. g. if there are nine members of a committee each councillor will be able to vote for up to nine representatives (which can include themselves if they wish). Once all votes have been cast they will be collated and counted by the Clerk and or Deputy Clerk and the nine councillors with the greatest number of votes will then be proposed as the members of the committee, working party or representative group and ratified by Full Council. In the event that there are fewer than the requisite number of councillors with a majority of the votes, then those councillors who are not initially elected will be voted for a second time, this time the number of votes being available being limited to the number of places that are still to be filled. This process will continue until all places have been filled by a majority of the votes cast.

9. MOTIONS FOR A MEETING THAT REQUIRE WRITTEN NOTICE TO BE GIVEN TO THE PROPER OFFICER

a A motion shall relate to the responsibilities of the meeting for which it is tabled and in any event shall relate to the performance of the Council's statutory functions, powers and obligations or an issue which specifically affects the Council's area or its residents.

b No motion may be moved at a meeting unless it is on the agenda and the mover has given written notice of its wording to the Proper Officer at least (5) clear days before the meeting. Clear days do not include the day of the notice or the day of the meeting.

c The Proper Officer may, before including a motion on the agenda received in accordance with standing order 9(b), correct obvious grammatical or typographical errors in the wording of the motion.

d If the Proper Officer considers the wording of a motion received in accordance with standing order 9(b) is not clear in meaning, the motion shall be rejected until the mover of the motion resubmits it, so that it can be understood, in writing, to the Proper Officer at least (4) clear days before the meeting.

e If the wording or subject of a proposed motion is considered improper, the Proper Officer shall consult with the chairman of the forthcoming meeting or, as the case may be, the councillors who have convened the meeting, to consider whether the motion shall be included in the agenda or rejected.

f The decision of the Proper Officer as to whether or not to include the motion on the agenda shall be final.

g Motions received shall be recorded and numbered in the order that they are received.

h Motions rejected shall be recorded with an explanation by the Proper Officer of the reason for rejection.

10. MOTIONS AT A MEETING THAT DO NOT REQUIRE WRITTEN NOTICE

a The following motions may be moved at a meeting without written notice to the Proper Officer:

i. to correct an inaccuracy in the draft minutes of a meeting;

ii. to move to a vote;

iii. to defer consideration of a motion;

iv. to refer a motion to a particular committee or sub-committee;

v. to appoint a person to preside at a meeting;

vi. to change the order of business on the agenda;

vii. to proceed to the next business on the agenda;

viii. to require a written report;

ix. to appoint a committee or sub-committee and their members;

x. to extend the time limits for speaking;

xi. to exclude the press and public from a meeting in respect of confidential or other information which is prejudicial to the public interest;

xii. to not hear further from a councillor or a member of the public;

xiii. to exclude a councillor or member of the public for disorderly conduct;

xiv. to temporarily suspend the meeting;

xv. to suspend a particular standing order (unless it reflects mandatory statutory or legal requirements);

xvi. to adjourn the meeting; or

xvii. to close the meeting.

11. MANAGEMENT OF INFORMATION

See also standing order 20.

a **The Council shall have in place and keep under review, technical and organisational measures to keep secure information (including personal data) which it holds in paper and electronic form. Such arrangements shall include deciding who has access to personal data and encryption of personal data.**

b **The Council shall have in place, and keep under review, policies for the retention and safe destruction of all information (including personal data) which it holds in paper and electronic form. The Council's retention policy shall confirm the period for which information (including personal data) shall be retained or if this is not possible the criteria used to determine that period (e.g. the Limitation Act 1980).**

c **The agenda, papers that support the agenda and the minutes of a meeting shall not disclose or otherwise undermine confidential information or personal data without legal justification.**

d **Councillors, staff, the Council's contractors and agents shall not disclose confidential information or personal data without legal justification.**

12. DRAFT MINUTES

Full Council meetings •
Committee meetings •
Sub-committee meetings •

a If the draft minutes of a preceding meeting have been served on councillors with the agenda to attend the meeting at which they are due to be approved for accuracy, they shall be taken as read.

b There shall be no discussion about the draft minutes of a preceding meeting except in relation to their accuracy. A motion to correct an inaccuracy in the draft minutes shall be moved in accordance with standing order 10(a)(i).

c The accuracy of draft minutes, including any amendment(s) made to them, shall be confirmed by resolution and shall be signed by the chairman of the meeting and stand as an accurate record of the meeting to which the minutes relate.

d If the chairman of the meeting does not consider the minutes to be an accurate record of the meeting to which they relate, he shall sign the minutes and include a paragraph in the following terms or to the same effect:

> "The chairman of this meeting does not believe that the minutes of the meeting of the ( ) held on [date] in respect of ( ) were a correct record but his view was not upheld by the meeting and the minutes are confirmed as an accurate record of the proceedings."

● e **The Council will publish draft minutes on a website which is publicly accessible and free of charge not later than one month after the meeting has taken place has taken place and will endeavour to do so within five working days.**

f Subject to the publication of draft minutes in accordance with standing order 12(e) and standing order 20(a) and following a resolution which confirms the accuracy of the minutes of a meeting, the draft minutes of the meeting for which approved minutes exist shall be destroyed.

13. CODE OF CONDUCT AND DISPENSATIONS

See also standing order 3(u).

a All councillors and non-councillors with voting rights shall observe the code of conduct adopted by the Council.

b Unless he has been granted a dispensation, a councillor or non-councillor with voting rights shall withdraw from a meeting when it is considering a matter in which he has a disclosable pecuniary interest. He may return to the meeting after it has considered the matter in which he had the interest.

c Unless he has been granted a dispensation, a councillor or non-councillor with voting rights shall withdraw from a meeting when it is considering a matter in which he has another interest if so required by the Council's code of conduct. He may return to the meeting after it has considered the matter in which he had the interest.

d **Dispensation requests shall be in writing and submitted to the Proper Officer** as soon as possible before the meeting, or failing that, at the start of the meeting for which the dispensation is required.

e A decision as to whether to grant a dispensation shall be made by the Proper Officer.

f A dispensation request shall confirm:

i. the description and the nature of the disclosable pecuniary interest or other interest to which the request for the dispensation relates;

ii. whether the dispensation is required to participate at a meeting in a discussion only or a discussion and a vote;

iii. the date of the meeting or the period (not exceeding four years) for which the dispensation is sought; and

iv. an explanation as to why the dispensation is sought.

g Subject to standing orders 13(d) and (f), a dispensation request shall be considered by the Proper Officer before the meeting or, if this is not possible, at the start of the meeting for which the dispensation is required.

h A dispensation may be granted in accordance with standing order 13(e) if having regard to all relevant circumstances any of the following apply:

i. without the dispensation the number of persons prohibited from participating in the particular business would be so great a proportion of the meeting transacting the business as to impede the transaction of the business;

ii. granting the dispensation is in the interests of persons living in the Council's area; or

iii. it is otherwise appropriate to grant a dispensation.

14. CODE OF CONDUCT COMPLAINTS

a Upon notification by the District or Unitary Council that it is dealing with a complaint that a councillor or non-councillor with voting rights has breached the Council's code of conduct, the Proper Officer shall, subject to standing order 11, report this to the Council.

b Where the notification in standing order 14(a) relates to a complaint made by the Proper Officer, the Proper Officer shall notify the Chairman of Council of this fact, and the Chairman shall nominate another staff member to assume the duties of the Proper Officer in relation to the complaint until it has been determined and the Council has agreed what action, if any, to take in accordance with standing order 14(d).

c The Council may:

i. provide information or evidence where such disclosure is necessary to investigate the complaint or is a legal requirement;

ii. seek information relevant to the complaint from the person or body with statutory responsibility for investigation of the matter;

d **Upon notification by the District Council that a councillor or non-councillor with voting rights has breached the Council's code of conduct, the Council shall consider what, if any, action to take against him. Such action excludes disqualification or suspension from office.**

15. PROPER OFFICER

a The Proper Officer shall be either (i) the clerk or (ii) other staff member(s) nominated by the Council to undertake the work of the Proper Officer when the Proper Officer is absent.

b The Proper Officer shall:

i. **at least three clear days before a meeting of the council, a committee** or a sub-committee**,**

- **serve on councillors by delivery or post at their residences or by email authenticated in such manner as the Proper Officer thinks fit, a signed summons confirming the time, place and the agenda (provided the councillor has consented to service by email), and**
- **Provide, in a conspicuous place, public notice of the time, place and agenda (provided that the public notice with agenda of an extraordinary meeting of the Council convened by councillors is signed by them).**

See standing order 3(b) for the meaning of clear days for a meeting of a full council and standing order 3(c) for the meaning of clear days for a meeting of a committee;

ii. subject to standing order 9, include on the agenda all motions in the order received unless a councillor has given written notice at least (4) days before the meeting confirming his withdrawal of it;

iii. **convene a meeting of the Council for the election of a new Chairman of the Council, occasioned by a casual vacancy in his office;**

iv. **facilitate inspection of the minute book by local government electors;**

v. **receive and retain copies of byelaws made by other local authorities;**

vi. hold acceptance of office forms from councillors;

vii. hold a copy of every councillor's register of interests;

viii. assist with responding to requests made under freedom of information legislation and rights exercisable under data protection legislation, in accordance with the Council's relevant policies and procedures;

ix. liaise, as appropriate, with the Council's Data Protection Officer (if there is one);

x. receive and send general correspondence and notices on behalf of the Council except where there is a resolution to the contrary;

xi. assist in the organisation of, storage of, access to, security of and destruction of information held by the Council in paper and electronic form subject to the requirements of data protection and freedom of information legislation and other legitimate requirements (e.g. the Limitation Act 1980);

xii. arrange for legal deeds to be executed;
(*see also standing order 23);*

xiii. arrange or manage the prompt authorisation, approval, and instruction regarding any payments to be made by the Council in accordance with its financial regulations;

xiv. record every planning application notified to the Council and the Council's response to the local planning authority in a book for such purpose;

xv. refer a planning application received by the Council to the Chairman or in his absence Vice-Chairman (if there is one) of the Planning Committee within two working days of receipt to facilitate an extraordinary meeting if the nature of a planning application requires consideration before the next ordinary meeting of the Planning committee;

xvi. manage access to information about the Council via the publication scheme; and

xvii. retain custody of the seal of the Council (if there is one) which shall not be used without a resolution to that effect.
(s*ee also standing order 23).*

16. RESPONSIBLE FINANCIAL OFFICER

a The Council shall appoint appropriate staff member(s) to undertake the work of the Responsible Financial Officer when the Responsible Financial Officer is absent.

17. ACCOUNTS AND ACCOUNTING STATEMENTS

a "Proper practices" in standing orders refer to the most recent version of "Governance and Accountability for Local Councils – a Practitioners' Guide".

b All payments by the Council shall be authorised, approved and paid in accordance with the law, proper practices and the Council's financial regulations.

c The Responsible Financial Officer shall supply to each councillor as soon as practicable after 30 June, 30 September and 31 December in each year a statement to summarise:

i. the Council's receipts and payments (or income and expenditure) for each quarter;

ii. the Council's aggregate receipts and payments (or income and expenditure) for the year to date;

iii. the balances held at the end of the quarter being reported and

which includes a comparison with the budget for the financial year and highlights any actual or potential overspends.

d As soon as possible after the financial year end at 31 March, the Responsible Financial Officer shall provide:

i. each councillor with a statement summarising the Council's receipts and payments (or income and expenditure) for the last quarter and the year to date for information; and

ii. to the Council the accounting statements for the year in the form of Section 2 of the annual governance and accountability return, as required by proper practices, for consideration and approval.

e The year-end accounting statements shall be prepared in accordance with proper practices and apply the form of accounts determined by the Council (receipts and payments, or income and expenditure) for the year to 31 March. A completed draft annual governance and accountability return shall be presented to all councillors at least 14 days prior to anticipated approval by the Council. The annual governance and accountability return of the Council, which is subject to external audit, including the annual governance statement, shall be presented to the Council for consideration and formal approval before 30 June.

18. FINANCIAL CONTROLS AND PROCUREMENT

a. The Council shall consider and approve financial regulations drawn up by the Responsible Financial Officer, which shall include detailed arrangements in respect of the following:

i. the keeping of accounting records and systems of internal controls;

ii. the assessment and management of financial risks faced by the Council;

iii. the work of the independent internal auditor in accordance with proper practices and the receipt of regular reports from the internal auditor, which shall be required at least annually;

iv. the inspection and copying by councillors and local electors of the Council's accounts and/or orders of payments; and

v. whether contracts with an estimated value below **£60,000** due to special circumstances are exempt from a tendering process or procurement exercise.

b. Financial regulations shall be reviewed regularly and at least annually for fitness of purpose.

c. Subject to additional requirements in the financial regulations of the Council, the tender process for contracts for the supply of goods, materials, services or the execution of works shall include, as a minimum, the following steps:

  i. a specification for the goods, materials, services or the execution of works shall be drawn up;

  ii. an invitation to tender shall be drawn up to confirm (i) the Council's specification (ii) the time, date and address for the submission of tenders (iii) the date of the Council's written response to the tender and (iv) the prohibition on prospective contractors contacting councillors or staff to encourage or support their tender outside the prescribed process;

  iii. tenders are to be submitted in writing in a sealed marked envelope addressed to the Proper Officer;

  iv. tenders shall be opened by the Proper Officer in the presence of at least one councillor after the deadline for submission of tenders has passed;

  v. tenders are to be reported to and considered by the appropriate meeting of the Council or a committee or sub-committee with delegated responsibility.

d. Neither the Council, nor a committee or a sub-committee with delegated responsibility for considering tenders, is bound to accept the lowest value tender.

e. **Where the value of a contract is likely to exceed the threshold specified by the Government from time to time, the Council must consider whether the contract is subject to the requirements of the current procurement legislation and, if so, the Council must comply with procurement rules. NALC's procurement guidance contains further details.**

19. HANDLING STAFF MATTERS

a A matter personal to a member of staff that is being considered by a meeting of the Personnel committee subject to standing order 11.

b Subject to the Council's policy regarding absences from work, the Council's most senior member of staff shall notify the chairman of the Personnel Committee or, if he is not available, the vice-chairman if there is one of the Personnel committee of absence occasioned by illness or other reason and that person shall report such absence to the Personnel Committee at its next meeting.

c Two councillors from the Personnel Committee, usually the chairman and vice-chairman of the Personnel committee shall conduct a review of the performance and annual appraisal of the work of the Clerk. The reviews and appraisal shall be reported back to the Personnel Committee in writing and are subject to approval by resolution the Full Council

d Subject to the Council's policy regarding the handling of grievance matters, the Council's most senior member of staff (or other members of staff) shall contact the chairman of Personnel committee or in his absence, the vice-chairman of the Personnel committee in respect of an informal or formal grievance matter, and this matter shall be reported back and progressed by resolution of Personnel committee.

e Subject to the Council's policy regarding the handling of grievance matters, if an informal or formal grievance matter raised by the Clerk or Deputy Clerk relates to the chairman or vice-chairman of the Personnel committee this shall be communicated to another member of Personnel committee, which shall be reported back and progressed by resolution of the Personnel committee.

f Any persons responsible for all or part of the management of staff shall treat as confidential the written records of all meetings relating to their performance, capabilities, grievance or disciplinary matters.

g In accordance with standing order 11(a), persons with line management responsibilities shall have access to staff records referred to in standing order 19(f).

20. RESPONSIBILITIES TO PROVIDE INFORMATION

See also standing order 21.

a **In accordance with freedom of information legislation, the Council shall publish information in accordance with its publication scheme and respond to requests for information held by the Council.**

b. [*If gross annual income or expenditure (whichever is the higher) exceeds £200,000*] **The Council, shall publish information in accordance with the requirements of the Local Government (Transparency Requirements) (England) Regulations 2015**.

21. RESPONSIBILITIES UNDER DATA PROTECTION LEGISLATION

(Below is not an exclusive list).
See also standing order 11.

a The Council may appoint a Data Protection Officer.

b **The Council shall have policies and procedures in place to respond to an individual exercising statutory rights concerning his personal data.**

c **The Council shall have a written policy in place for responding to and managing a personal data breach.**

d **The Council shall keep a record of all personal data breaches comprising the facts relating to the personal data breach, its effects and the remedial action taken.**

e **The Council shall ensure that information communicated in its privacy notice(s) is in an easily accessible and available form and kept up to date.**

f **The Council shall maintain a written record of its processing activities.**

22. RELATIONS WITH THE PRESS/MEDIA

a Requests from the press or other media for an oral or written comment or statement from the Council, its councillors or staff shall be handled in accordance with the Council's policy in respect of dealing with the press and/or other media.

23. EXECUTION AND SEALING OF LEGAL DEEDS

See also standing orders 15(b)(xii) and (xvii).

a A legal deed shall not be executed on behalf of the Council unless authorised by a resolution.

b **[Subject to standing order 23(a), the Council's common seal shall alone be used for sealing a deed required by law. It shall be applied by the Proper Officer in the presence of two councillors who shall sign the deed as witnesses.]**

24. COMMUNICATING WITH DISTRICT AND COUNTY OR UNITARY COUNCILLORS

a An invitation to attend a meeting of the Council shall be sent, together with the agenda, to the ward councillor(s) of the District and County Council OR Unitary Council representing the area of the Council.

b Unless the Council determines otherwise, a copy of each letter sent to the District and County Council OR Unitary Council shall be sent to the ward councillor(s) representing the area of the Council.

25. RESTRICTIONS ON COUNCILLOR ACTIVITIES

a. Unless duly authorised no councillor shall:

i. inspect any land and/or premises which the Council has a right or duty to inspect; or

ii. issue orders, instructions or directions.

26. STANDING ORDERS GENERALLY

a All or part of a standing order, except one that incorporates mandatory statutory or legal requirements, may be suspended by resolution in relation to the consideration of an item on the agenda for a meeting.

b A motion to add to or vary or revoke one or more of the Council's standing orders, except one that incorporates mandatory statutory or legal requirements, shall be proposed by a special motion, the written notice by at least (8) councillors to be given to the Proper Officer in accordance with standing order 9.

c The Proper Officer shall provide a copy of the Council's standing orders to a councillor as soon as possible.

d The decision of the chairman of a meeting as to the application of standing orders at the meeting shall be final.

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Financial Regulations

Adopted by Full Council on 18th May 2026

STEYNING TOWN COUNCIL FINANCIAL REGULATIONS

Contents

1. General

1.1. These Financial Regulations govern the financial management of the council and may only be amended or varied by resolution of the council. They are one of the council's governing documents and shall be observed in conjunction with the council's Standing Orders.

1.2. Councillors are expected to follow these regulations and not to entice employees to breach them. Failure to follow these regulations brings the office of councillor into disrepute.

1.3. Wilful breach of these regulations by an employee may result in disciplinary proceedings.

1.4. In these Financial Regulations:

- 'Accounts and Audit Regulations' means the regulations issued under Sections 32, 43(2) and 46 of the Local Audit and Accountability Act 2014, or any superseding legislation, and then in force, unless otherwise specified.
- "Approve" refers to an online action, allowing an electronic transaction to take place.
- "Authorise" refers to a decision by the council, or a committee or an officer, to allow something to happen.
- 'Proper practices' means those set out in *The Practitioners' Guide*
- *Practitioners' Guide* refers to the guide issued by the Joint Panel on Accountability and Governance (JPAG) and published by NALC in England or Governance and Accountability for Local Councils in Wales – A Practitioners Guide jointly published by One Voice Wales and the Society of Local Council Clerks in Wales.
- 'Must' and **bold text** refer to a statutory obligation the council cannot change.
- 'Shall' refers to a non-statutory instruction by the council to its members and staff.

1.5. The Responsible Financial Officer (RFO) holds a statutory office, appointed by the council. The Clerk has been appointed as RFO, and these regulations apply accordingly. The RFO;

- acts under the policy direction of the council;
- administers the council's financial affairs in accordance with all Acts, Regulations and proper practices;
- determines on behalf of the council its accounting records and control systems;
- ensures the accounting control systems are observed;
- ensures the accounting records are kept up to date;
- seeks economy, efficiency and effectiveness in the use of council resources; and
- produces financial management information as required by the council.

1.6. **The council must not delegate any decision regarding:**

- **setting the final budget or the precept (council tax requirement);**
- **the outcome of a review of the effectiveness of its internal controls**
- **approving accounting statements;**
- **approving an annual governance statement;**
- **borrowing;**
- **declaring eligibility for the General Power of Competence; and**
- **addressing recommendations from the internal or external auditors**

1.7. In addition, the council shall:

- determine and regularly review the bank mandate for all council bank accounts;
- authorise any grant or single commitment in excess of £5,000;

2. Risk management and internal control

2.1. **The council must ensure that it has a sound system of internal control, which delivers effective financial, operational and risk management.**

2.2. The Clerk shall prepare, for approval by the council, a risk management policy covering all activities of the council. This policy and consequential risk management arrangements shall be reviewed by the council at least annually.

2.3. When considering any new activity, the Clerk shall prepare a draft risk assessment including risk management proposals for consideration by the council.

2.4. **At least once a year, the council must review the effectiveness of its system of internal control, before approving the Annual Governance Statement.**

2.5. **The accounting control systems determined by the RFO must include measures to:**

- **ensure that risk is appropriately managed;**
- **ensure the prompt, accurate recording of financial transactions;**
- **prevent and detect inaccuracy or fraud; and**
- **allow the reconstitution of any lost records;**
- **identify the duties of officers dealing with transactions and**
- **ensure division of responsibilities.**

2.6. At least once in each quarter, and at each financial year end, a member other than the Chair {or a cheque signatory} shall be appointed to verify bank reconciliations (for all accounts) produced by the RFO. The member shall sign and date the reconciliations and the original bank statements as evidence of this. This activity, including any exceptions, shall be reported to and noted by the council {Finance and General Purposes Committee}.

2.7. Regular back-up copies shall be made of the records on any council computer and stored either online or in a separate location from the computer. The council shall put measures in place to ensure that the ability to access any council computer is not lost if an employee leaves or is incapacitated for any reason.

3. Accounts and audit

3.1. All accounting procedures and financial records of the council shall be determined by the RFO in accordance with the Accounts and Audit Regulations.

3.2. **The accounting records determined by the RFO must be sufficient to explain the council's transactions and to disclose its financial position with reasonable accuracy at any time. In particular, they must contain:**

- **day-to-day entries of all sums of money received and expended by the council and the matters to which they relate;**
- **a record of the assets and liabilities of the council;**

3.3. The accounting records shall be designed to facilitate the efficient preparation of the accounting statements in the Annual {Governance and Accountability} Return.

3.4. The RFO shall complete and certify the annual Accounting Statements of the council contained in the Annual {Governance and Accountability} Return in accordance with proper practices, as soon as practicable after the end of the financial year. Having certified the Accounting Statements, the RFO shall submit them (with any related documents) to the council, within the timescales required by the Accounts and Audit Regulations.

3.5. **The council must ensure that there is an adequate and effective system of internal audit of its accounting records and internal control system in accordance with proper practices**.

3.6. **Any officer or member of the council must make available such documents and records as the internal or external auditor consider necessary for the purpose of the audit** and shall, as directed by the council, supply the RFO, internal auditor, or external auditor with such information and explanation as the council considers necessary.

3.7. The internal auditor shall be appointed by Steyning Town Council and shall carry out their work to evaluate the effectiveness of the council's risk management, control and governance processes in accordance with proper practices specified in the Practitioners' Guide.

3.8. The council shall ensure that the internal auditor:

- is competent and independent of the financial operations of the council;
- reports to council in writing, or in person, on a regular basis with a minimum of one written report during each financial year;
- can demonstrate competence, objectivity and independence, free from any actual or perceived conflicts of interest, including those arising from family relationships; and

- has no involvement in the management or control of the council

3.9. Internal or external auditors may not under any circumstances:

- perform any operational duties for the council;
- initiate or approve accounting transactions;
- provide financial, legal or other advice including in relation to any future transactions; or
- direct the activities of any council employee, except to the extent that such employees have been appropriately assigned to assist the internal auditor.

3.10. For the avoidance of doubt, in relation to internal audit the terms 'independent' and 'independence' shall have the same meaning as described in The Practitioners Guide.

3.11. The RFO shall make arrangements for the exercise of electors' rights in relation to the accounts, including the opportunity to inspect the accounts, books, and vouchers and display or publish any notices and documents required by the Local Audit and Accountability Act 2014, or any superseding legislation, and the Accounts and Audit Regulations.

3.12. The RFO shall, without undue delay, bring to the attention of all councillors any correspondence or report from internal or external auditors.

4. Budget and precept

4.1. **Before setting a precept, the council must calculate its [council tax (England)/budget (Wales)] requirement for each financial year by preparing and approving a budget, in accordance with The Local Government Finance Act 1992 or succeeding legislation.**

4.2. Budgets for salaries and wages, including employer contributions shall be reviewed by Steyning Town Council at least annually in October for the following financial year and the final version shall be evidenced by a hard copy schedule signed by the Clerk and the Chair of the Council or relevant committee. {The RFO will inform committees of any salary implications before they consider their draft budgets.}

4.3. No later than December each year, the RFO shall prepare a draft budget with detailed estimates of all income and expenditure for the following financial year {along with a forecast for the following [three financial years]}, taking account of the lifespan of assets and cost implications of repair or replacement.

4.4. Unspent budgets for completed projects shall not be carried forward to a subsequent year. Unspent funds for partially completed projects may only be carried forward (by placing them in an earmarked reserve) with the formal approval of the full council.

4.5. Each committee shall review its draft budget and submit any proposed amendments to the council's finance committee not later than the end of November each year.

4.6. The draft budget with any committee proposals and [three-year] forecast, including any recommendations for the use or accumulation of reserves, shall be considered by the finance committee and a recommendation made to the council.

4.7. Having considered the proposed budget and [three-year] forecast, the council shall determine its council tax requirement by setting a budget. The council shall set a precept for this amount no later than the end of January for the ensuing financial year.

4.8. **Any member with council tax unpaid for more than two months is prohibited from voting on the budget or precept by Section 106 of the Local Government Finance Act 1992 and must disclose at the start of the meeting that Section 106 applies to them.**

4.9. The RFO shall **issue the precept to the billing authority no later than the end of February** and supply each member with a copy of the agreed annual budget.

4.10. The agreed budget provides a basis for monitoring progress during the year by comparing actual spending and income against what was planned.

4.11. Any addition to, or withdrawal from, any earmarked reserve shall be agreed by the finance committee.

5. Procurement

5.1. **Members and officers are responsible for obtaining value for money at all times.** Any officer procuring goods, services or works should ensure, as far as practicable, that the best available terms are obtained, usually by obtaining prices from several suppliers.

5.2. The RFO should verify the lawful nature of any proposed purchase before it is made and in the case of new or infrequent purchases, should ensure that the legal power being used is reported to the meeting at which the order is authorised and also recorded in the minutes.

5.3. Every contract shall comply with the council's Standing Orders and these Financial Regulations, and no exceptions shall be made, except in an emergency.

5.4. **For a contract for the supply of goods, services or works where the estimated value will exceed the thresholds set by Parliament, the full requirements of The Procurement Act 2023 and The Procurement Regulations 2024 or any superseding legislation ("the Legislation"), must be followed in respect of the tendering, award and notification of that contract.**

5.5. Where the estimated value is below the Government threshold, the council shall (with the exception of items listed in paragraph 5.12) obtain prices as follows:

5.6. For contracts estimated to exceed £60,000 including VAT, the Clerk shall seek formal tenders from at least three suppliers agreed by Steyning Town Council Tenders shall be invited in accordance with Appendix 1.

5.7. **For contracts estimated to be over £30,000 including VAT, the council must comply with any requirements of the Legislation regarding the publication of invitations and notices.**

5.8. For contracts greater than £4,000 excluding VAT the Clerk RFO shall seek at least 3 fixed-price quotes;

5.9. where the value is between £1000 and £4,000 excluding VAT, the Clerk shall try to obtain 3 estimates {which might include evidence of online prices, or recent prices from regular suppliers.}

5.10. For smaller purchases, the Clerk shall seek to achieve value for money.

5.11. **Contracts must not be split to avoid compliance with these rules.**

5.12. The requirement to obtain competitive prices in these regulations need not apply to contracts that relate to items (i) to (iv) below:

i. specialist services, such as legal professionals acting in disputes;

ii. repairs to, or parts for, existing machinery or equipment;

iii. works, goods or services that constitute an extension of an existing contract;

iv. goods or services that are only available from one supplier or are sold at a fixed price.

5.13. When applications are made to waive this financial regulation to enable a price to be negotiated without competition, the reason should be set out in a recommendation to the finance committee. Avoidance of competition is not a valid reason.

5.14. The council shall not be obliged to accept the lowest or any tender, quote or estimate.

5.15. Individual purchases within an agreed budget for that type of expenditure may be authorised by:

- the Clerk, under delegated authority, for any items below £1,500 excluding VAT.
- the Clerk, in consultation with the Chair of the Council {or Chair of the appropriate committee}, for any items below £2,500 excluding VAT.
- {a duly delegated committee of the council for all items of expenditure within their delegated budgets for items under £5,000 excluding VAT}
- in respect of grants, a duly authorised committee within any limits set by council and in accordance with any policy statement agreed by the council.
- the council for all items over £5,000;

Such authorisation must be supported by a minute in the case of council or committee decisions or other auditable evidence trail.

5.16. No individual member, or informal group of members may issue an official order unless instructed to do so in advance by a resolution of the council, or make any contract on behalf of the council.

5.17. No expenditure may be authorised that will exceed the budget for that type of expenditure other than by resolution of the council except in an emergency.

5.18. In cases of serious risk to the delivery of council services or to public safety on council premises, the clerk may authorise expenditure of up to £3,000 excluding

VAT on repair, replacement or other work that in their judgement is necessary, whether or not there is any budget for such expenditure. The Clerk shall report such action to the Chair as soon as possible and to Steyning Town Council as soon as practicable thereafter.

5.19. No expenditure shall be authorised, no contract entered into, or tender accepted in relation to any major project, unless Steyning Town Council is satisfied that the necessary funds are available and that where a loan is required, Government borrowing approval has been obtained first.

5.20. An official order, email or letter shall be issued for all work, goods and services {above £1,000 excluding VAT} unless a formal contract is to be prepared, or an official order would be inappropriate. Copies of orders shall be retained, along with evidence of receipt of goods.

5.21. Any ordering system can be misused and access to them shall be controlled by the RFO.

6. Banking and payments

6.1. The council's banking arrangements, including the bank mandate, shall be made by the RFO and authorised by the council; banking arrangements shall not be delegated to a committee. The council has resolved to bank with HSBC and Unity Banks. The arrangements shall be reviewed annually for security and efficiency.

6.2. The council must have safe and efficient arrangements for making payments, to safeguard against the possibility of fraud or error. Wherever possible, more than one person should be involved in any payment, for example by dual online authorisation or dual cheque signing. Even where a purchase has been authorised, the payment must also be authorised, and only authorised payments shall be approved or signed to allow the funds to leave the council's bank.

6.3. All invoices for payment should be examined for arithmetical accuracy, analysed to the appropriate expenditure heading and verified to confirm that the work, goods or services were received, checked and represent expenditure previously authorised by the council before being certified by the RFO. Where the certification of invoices is done as a batch, this shall include a statement by the RFO that all invoices listed have been 'examined, verified and certified' by the RFO.

6.4. Personal payments (including salaries, wages, expenses and any payment made in relation to the termination of employment) may be summarised to avoid disclosing any personal information.

6.5. All payments shall be made by online banking, in accordance with a resolution of the council or duly delegated committee or a delegated decision by an officer, unless Steyning Town Council resolves to use a different payment method.

6.6. The Clerk and RFO shall have delegated authority to authorise payments {only} in the following circumstances:

i. {any payments of up to £1,500 excluding VAT, within an agreed budget}.

ii. payments of up to £2,500 excluding VAT in cases of serious risk to the delivery of council services or to public safety on council premises.

iii. any payment necessary to avoid a charge under the Late Payment of Commercial Debts (Interest) Act 1998 {or to comply with contractual terms}, where the due date for payment is before the next scheduled meeting of the council, where the Clerk certifies that there is no dispute or other reason to delay payment, provided that a list of such payments shall be submitted to the next appropriate meeting of council {or finance committee}.

iv. Fund transfers within the councils banking arrangements up to the sum of £80,000, provided that a list of such payments shall be submitted to the next appropriate meeting of the finance committee.

6.7. The RFO shall present a schedule of payments requiring authorisation, forming part of the agenda for the meeting, together with the relevant invoices, to the finance committee. The committee shall review the schedule for compliance and, having satisfied itself, shall authorise payment by resolution. The authorised schedule shall be initialled immediately below the last item by the person chairing the meeting. A detailed list of all payments shall be disclosed within or as an attachment to the minutes of that meeting.

7. Electronic payments

7.1. Where internet banking arrangements are made with any bank, the RFO shall be appointed as the Service Administrator. The bank mandate agreed by the council shall identify a number of councillors who will be authorised to approve transactions on those accounts and a minimum of two people will be involved in any online approval process. The Clerk may be an authorised signatory, but no signatory should be involved in approving any payment to themselves, unless countersigned by at least one other signatory, and the Clerk.

7.2. All authorised signatories shall have access to view the council's bank accounts online.

7.3. No employee or councillor shall disclose any PIN or password, relevant to the council or its banking, to anyone not authorised in writing by the council or a duly delegated committee.

7.4. The Service Administrator shall set up all items due for payment online. A list of payments for approval, together with copies of the relevant invoices, shall be sent by email, or in person, to two authorised signatories.

7.5. In the prolonged absence of the Service Administrator, the Deputy Clerk shall set up any payments due before the return of the Service Administrator.

7.6. Two councillors who are authorised signatories shall check the payment details against the invoices before approving each payment.

7.7. Evidence shall be retained showing which members approved the payment.

7.8. A full list of all payments made in a month shall be provided to the next Finance committee meeting {and appended to the minutes}.

7.9. With the approval of Steyning Town Council in each case, regular payments (such as gas, electricity, telephone, broadband, water, National Non-Domestic Rates, refuse collection, pension contributions and HMRC payments) may be made by variable direct debit, provided that the instructions are signed/approved online by two authorised members. The approval of the use of each variable direct debit shall be reviewed by Steyning Town Council at least every two years.

7.10. Payment may be made by BACS or CHAPS by resolution of Steyning Town Council provided that each payment is approved by two authorised bank signatories, evidence is retained and any payments are reported to the council at the next meeting. The approval of the use of BACS or CHAPS shall be renewed by resolution of the council at least every two years.

7.11. If thought appropriate by the council, regular payments of fixed sums may be made by banker's standing order, provided that the instructions are signed/approved online by two authorised members, evidence of this is retained and any payments are reported to council when made. The approval of the use of a banker's standing order shall be reviewed by Steyning Town Council at least every two years.

7.12. Account details for suppliers may only be changed upon written notification by the supplier verified by the Clerk and a member. This is a potential area for fraud and the individuals involved should ensure that any change is genuine. Data held should be checked with suppliers every two years.

7.13. Members and officers shall ensure that any computer used for the council's financial business has adequate security, with anti-virus, anti-spyware and firewall software installed and regularly updated.

7.14. Remembered password facilities {other than secure password stores requiring separate identity verification} should not be used on any computer used for council banking.

8. Cheque payments

8.1. Cheques or orders for payment in accordance with a resolution or delegated decision shall be signed by two members and countersigned by the Clerk.

8.2. A signatory having a family or business relationship with the beneficiary of a payment shall not, under normal circumstances, be a signatory to that payment.

8.3. To indicate agreement of the details on the cheque with the counterfoil and the invoice or similar documentation, the signatories shall also initial the cheque counterfoil and invoice.

8.4. Cheques or orders for payment shall not normally be presented for signature other than at, or immediately before or after a council {or committee} meeting. Any signatures obtained away from council meetings shall be reported to the council {or Finance Committee} at the next convenient meeting.

9. Payment cards

9.1. Any Debit Card issued for use will be specifically restricted to the Clerk and the Deputy Clerk and will also be restricted to a single transaction maximum value of £1,500 unless authorised by council or finance committee in writing before any order is placed.

9.2. A pre-paid debit card may be issued to employees with varying limits. These limits will be set by Steyning Town Council. Transactions and purchases made will be reported to the council and authority for topping-up shall be at the discretion of the council.

9.3. Any corporate credit card or trade card account opened by the council will be specifically restricted to use by the Clerk and the Deputy Clerk and any balance shall be paid in full each month.

9.4. Personal credit or debit cards of members or staff shall not be used under any circumstances.

10. Petty Cash

10.1. The RFO shall maintain a petty cash float of £75 and may provide petty cash to officers for the purpose of defraying operational and other expenses.

a) Vouchers for payments made from petty cash shall be kept, along with receipts to substantiate every payment.

b) Cash income received must not be paid into the petty cash float but must be separately banked, as provided elsewhere in these regulations.

c) Payments to maintain the petty cash float shall be shown separately on any schedule of payments presented for approval.

11. Payment of salaries and allowances

11.1. **As an employer, the council must make arrangements to comply with the statutory requirements of PAYE legislation.**

11.2. **Councillors allowances (where paid) are also liable to deduction of tax under PAYE rules and must be taxed correctly before payment.**

11.3. Salary rates shall be agreed by the council, or a duly delegated committee. No changes shall be made to any employee's gross pay, emoluments, or terms and conditions of employment without the prior consent of the council.

11.4. Payment of salaries shall be made, after deduction of tax, national insurance, pension contributions and any similar statutory or discretionary deductions, on the dates stipulated in employment contracts.

11.5. Deductions from salary shall be paid to the relevant bodies within the required timescales, provided that each payment is reported, as set out in these regulations above.

11.6. Each payment to employees of net salary and to the appropriate creditor of the statutory and discretionary deductions shall be recorded in a payroll control account or other separate confidential record, with the total of such payments each calendar month reported in the cashbook. Payroll reports will be reviewed by the finance committee Chairman to ensure that the correct payments have been made.

11.7. Any termination payments shall be supported by a report to the council, setting out a clear business case. Termination payments shall only be authorised by the full council.

11.8. Before employing interim staff, the council must consider a full business case.

12. Loans and investments

12.1. Any application for Government approval to borrow money and subsequent arrangements for a loan must be authorised by the full council and recorded in the minutes. All borrowing shall be in the name of the council, after obtaining any necessary approval.

12.2. Any financial arrangement which does not require formal borrowing approval from the Secretary of State (such as Hire Purchase, Leasing of tangible assets or loans to be repaid within the financial year) must be authorised by the full council, following a written report on the value for money of the proposed transaction.

12.3. The council shall consider the requirement for an Investment Strategy and Policy in accordance with Statutory Guidance on Local Government Investments, which must be written in accordance with relevant regulations, proper practices and guidance. Any Strategy and Policy shall be reviewed by the council at least annually.

12.4. All investment of money under the control of the council shall be in the name of the council.

12.5. All investment certificates and other documents relating thereto shall be retained in the custody of the RFO.

12.6. Payments in respect of short term or long-term investments, including transfers between bank accounts held in the same bank, shall be made in accordance with these regulations.

13. Income

13.1. The collection of all sums due to the council shall be the responsibility of and under the supervision of the RFO.

13.2. The council will review all fees and charges for work done, services provided, or goods sold at least annually as part of the budget-setting process, following a report of the Clerk or Deputy Clerk. The RFO shall be responsible for the collection of all amounts due to the council.

13.3. Any sums found to be irrecoverable, and any bad debts shall be reported to the council by the RFO and shall be written off in the year. The council’s approval shall be shown in the accounting records.

13.4. All sums received on behalf of the council shall be deposited intact with the council's bankers, with such frequency as the RFO considers necessary. The origin of each receipt shall clearly be recorded on the paying-in slip or other record.

13.5. Personal cheques shall not be cashed out of money held on behalf of the council.

13.6. The RFO shall ensure that VAT is correctly recorded in the council's accounting software and that any VAT Return required is submitted from the software by the due date.

13.7. Where significant sums of cash are regularly received by the council, the RFO shall ensure that more than one person is present when the cash is counted in the first instance, that there is a reconciliation to some form of control record such as ticket issues, and that appropriate care is taken for the security and safety of individuals banking such cash.

14. Payments under contracts for building or other construction works

14.1. Where contracts provide for payment by instalments the RFO shall maintain a record of all such payments, which shall be made within the time specified in the contract based on signed certificates from the architect or other consultant engaged to supervise the works.

14.2. Any variation of, addition to or omission from a contract must be authorised by the Clerk to the contractor in writing, with the council being informed where the final cost is likely to exceed the contract sum by 5% or more, or likely to exceed the budget available.

15. Stores and equipment

15.1. Delivery notes shall be obtained in respect of all goods received into store or otherwise delivered and goods must be checked as to order and quality at the time delivery is made.

15.2. The RFO shall be responsible for periodic checks of stocks and stores, at least annually.

16. Assets, properties and estates

16.1. The Clerk shall make arrangements for the safe custody of all title deeds and Land Registry Certificates of properties held by the council.

16.2. The RFO shall ensure that an appropriate and accurate Register of Assets and Investments is kept up to date, with a record of all properties held by the council, their location, extent, plan, reference, purchase details, nature of the interest, tenancies granted, rents payable and purpose for which held, in accordance with Accounts and Audit Regulations.

16.3. The continued existence of tangible assets shown in the Register shall be verified at least annually, possibly in conjunction with a health and safety inspection of assets.

16.4. No interest in land shall be purchased or otherwise acquired, sold, leased or otherwise disposed of without the authority of the council, together with any other consents required by law. In each case a written report shall be provided to council in respect of valuation and surveyed condition of the property (including matters such as planning permissions and covenants) together with a proper business case (including an adequate level of consultation with the electorate where required by law).

16.5. No tangible moveable property shall be purchased or otherwise acquired, sold, leased or otherwise disposed of, without the authority of the council, together with any other consents required by law, except where the estimated value of any one item does not exceed £1000. In each case a written report shall be provided to council with a full business case.

17. Insurance

17.1. The RFO shall keep a record of all insurances effected by the council and the property and risks covered, reviewing these annually before the renewal date in conjunction with the council's review of risk management.

17.2. The Deputy Clerk shall give prompt notification to the RFO of all new risks, properties or vehicles which require to be insured and of any alterations affecting existing insurances.

17.3. The RFO shall be notified of any loss, liability, damage or event likely to lead to a claim, and shall report these to Steyning Town Council at the next available meeting. The RFO shall negotiate all claims on the council's insurers in consultation with the Clerk.

17.4. All appropriate members and employees of the council shall be included in a suitable form of security or fidelity guarantee insurance which shall cover the maximum risk exposure as determined annually by the council, or duly delegated committee.

18. Suspension and revision of Financial Regulations

18.1. The council shall review these Financial Regulations annually and following any change of clerk or RFO. The Clerk shall monitor changes in legislation or proper practices and advise the council of any need to amend these Financial Regulations.

18.2. The council may, by resolution duly notified prior to the relevant meeting of council, suspend any part of these Financial Regulations, provided that reasons for the suspension are recorded and that an assessment of the risks arising has been presented to all members. Suspension does not disapply any legislation or permit the council to act unlawfully.

18.3. The council may temporarily amend these Financial Regulations by a duly notified resolution, to cope with periods of absence, local government reorganisation, national restrictions or other exceptional circumstances.

Appendix 1 - Tender process

1) Any invitation to tender shall state the general nature of the intended contract and the Clerk shall obtain the necessary technical assistance to prepare a specification in appropriate cases.
2) The invitation shall in addition state that tenders must be addressed to the Clerk in the ordinary course of post, unless an electronic tendering process has been agreed by the council.
3) Where a postal process is used, each tendering firm shall be supplied with a specifically marked envelope in which the tender is to be sealed and remain sealed until the prescribed date for opening tenders for that contract. All sealed tenders shall be opened at the same time on the prescribed date by the Clerk in the presence of at least one member of council.
4) Where an electronic tendering process is used, the council shall use a specific email address that will be monitored to ensure that nobody accesses any tender before the expiry of the deadline for submission.
5) Any invitation to tender issued under this regulation shall be subject to Standing Order [insert reference of the council's relevant standing order] and shall refer to the terms of the Bribery Act 2010.
6) Where the council, or duly delegated committee, does not accept any tender, quote or estimate, the work is not allocated and the council requires further pricing, no person shall be permitted to submit a later tender, estimate or quote who was present when the original decision-making process was being undertaken.

Steyning Town Council Scheme of Delegation

To avoid Full Council having to make every decision the Council Scheme of Delegation is an essential policy to enable the Council to function efficiently and effectively, with decision making powers being given to both Committees and Officers to enable the Council to react to circumstances and operate effectively.

Powers cannot be legally delegated to individual Councillors or Working Groups.

Working parties are ordinarily established to investigate and or review a particular matter then report back to the relevant committee or Council with its findings which may include recommendations.

1 Council Functions

The following matters are to be dealt with by the Full Council:

1.1 Approval of Budget and setting the Precept.

1.2 Approval of the Annual Return and Audit of Accounts.

1.3 Authorisation of borrowing.

1.4 Adoption of or, changing all policies including Standing Orders, Financial Regulations and the Scheme of Delegation.

1.5 Making of Orders under any statutory powers.

1.6 Appointment of Standing Committees, their Chairs and Vice-Chairs.

1.7 Appointment of Council representatives to outside bodies.

1.8 Appointment of the Clerk and Deputy Clerk of the Council.

1.9 Receive and adopt the minutes of committees and to consider and approve any recommendations.

1.10 Approval of payments by committees for any single expenditure item over £5,000. *(See Appendix 1 – 4.1 Financial Regs)*

1.11 Consider, review and monitor the Neighbourhood Plan, once approved, and any local development plans, for example regional, district or local plans. The review process being undertaken by a Steering Committee which has its own terms of reference – these having been approved by Full Council

1.12 All other matters which must, by law, be reserved to the Full Council.

2 Delegation to Committees

Committees are given decision-making powers in respect of specific matters delegated by Council. They must be exercised in accordance with the law, the Council's Standing Orders and Financial Regulations and any approved policy framework and budget.

The Council may at any time, following resolution, revoke any delegated authority.

Committees may only 'resolve' those matters within their delegated powers, making 'recommendations' to Council on all other matters. Committees may decide not to exercise delegated responsibilities and instead make a 'recommendation' to the Council.

2.1 All Committees

2.1.1 Power to create working parties and sub-committee, with power to appoint councillors and/or members of the public to either, and to appoint officers to working parties but not to sub-committees

2.1.2 Appointment of Councillors to Working Groups by the Chair and Vice-Chair of the committee and the appointment of non-Councillor members to Working Groups where they bring additional expertise or knowledge, subject to confidentiality agreements consistent with those required of Councillors.

2.2 Finance, General Purposes Committee

All matters (except for creating Council Policy) relating to:

2.2.1 Those responsibilities delegated in the absence of the Town Clerk at the table referred to in 3.2.1

2.2.2 Review of budget position

2.2.3 To recommend and oversea the Councils Reserves policy.

2.2.4 Consideration of annual budget request from all standing Committees for recommendation to Council and to recommend to Council the precept for next financial year

2.2.5 Approval and award of grants and donations.

2.2.6 Ensure the Council meets its obligations to HMRC

2.2.7 Approval of expenditure within the budget set for the committee up to a limit of £5,000 on any single item and any expenditure beyond the limit to be recommended to Council for approval, as per 4.1 of the financial regulations , see appendix 1.

2.2.8 Monitor the availability of section 106 and Cil Funds and make recommendations to Council on non-Council applications for S106 and Cil Funding

2.2.9 Consider and agree recommendations to Council on action to all Internal & External Audit reports

2.2.10 Approval of Risk management strategy and review annual insurance policies.

2.2.11 Review and agree all contractual matters regarding leases on the buildings owned by the Council or, land owned by the Council on which buildings are situated.

2.2.12 Review annually the Council's Fixed Asset Register and ensure that insurance cover is adequate.

2.2.13 Oversee all maintenance contracts and where necessary make recommendations to Full Council.

2.2.14 Review and make recommendations to Council on Standing Orders, all policies and protocols and other legal, administration or accounting matters.

2.2.15 Oversee the Council's media

2.2.16 Neighbourhood Wardens

2.2.17 To delegate authority to the Proper Officer actions as it deems necessary to ensure that the Council's decisions are carried out efficiently and expediently and to ensure that the Proper officer reports back to the Council on what actions have been taken on its behalf.

2.2.18 Matters specifically delegated by the Council or, any other committee

2.2.19 More generally, to deal with any matter that it would serve to benefit the Council, by this committee making decisions related to Steyning Town Council Finance and Governance that have not already been stated above, and as per agreed to be placed on an Agenda by the Clerk and the Committee's Chair.

2.3 Community Committee

All matters (except for creating Council Policy) relating to:

2.3.1 Those responsibilities delegated in the absence of the Town Clerk at the table referred to in 3.2.1

2.3.2 Review and submit an annual budget to the F&GP committee

2.3.3 Oversee the committee's annual budget

2.3.4 Approval of expenditure within the budget set for the committee up to . a limit of £5000 on any single item and any expenditure beyond the limit to be recommended to Council for approval, as per Financial regulations 4.1, see Appendix 1.

2.3.5 Review and make recommendations to F&GP on contracts pertaining to the grass cutting of the playing fields and open spaces, the street cleaning and bin emptying in the High Street and the Memorial Playing Field.

2.3.6 Oversee the management and maintenance of the playing fields, Allotments and open spaces under the ownership of the Council and oversee the Public Rights of Way

2.3.7 Oversee in liaison with the Tree Warden the management and maintenance of all trees and hedgerows on Council Land.

2.3.8 Oversee the management of land, MPF Car Park and Changing rooms and other resources and oversee all matters concerning these premises including letting, maintenance, cleaning and Health and Safety.

2.3.9 Oversee the maintenance of all play areas and fitness/outdoor gym areas.

2.3.10 Report to and liaise with WSCC on strategic local highway matters and flooding (These matters not being the responsibility of Steyning Town Council)

2.3.11 Oversee the maintenance of Council (STC) owned street lighting and to liaise with HDC over the operation of all HDC owned car parks and to oversee all other parking issues.

2.3.12 Oversee maintenance contracts relevant to the committee and make any recommendations to F&GP.

2.3.13 Matters specifically delegated by Council or, any other committee.

2.3.14 More generally, to deal with any matter that it would serve to benefit the Council, by this committee making decisions, related to Steyning Town Council's Land Assets, the Towns other open spaces and public rights of way / Highways (in so far as it is able to do so) or Council assets which are not held within buildings such as Street furniture, and that have not already been stated above, and as per agreed to be placed on an Agenda by the Clerk and the Committee's Chair.

2.4 Planning & Premises

All matters (except for creating Council Policy) relating to:

2.4.1 Those responsibilities delegated in the absence of the Town Clerk at the table referred to in 3.2.1

2.4.2 Oversee the Committee budget and review and submit an annual budget to the F&GP committee

2.4.3 Approval of expenditure within the budget set for the committee up to a limit of £5000 on any single item and any expenditure beyond the limit to be recommended to Council for approval, as per Financial regulations 4.1, see Appendix 1.

2.4.4 Planning applications, making representations on all planning consultations, and making representations on all applications for public entertainment licences or liquor licences.

2.4.5 Tree works applications.

2.4.6 All other planning or highway matters the Town Council is consulted on.

2.4.7 Review of the Steyning Area Conservation Character Appraisal; ensuring that development is in accordance with national or, local Conservation Area Requirements, and seeking additional protection as appropriate.

2.4.8 CCTV management, maintenance and renewal

2.4.9 Oversee all matters concerning premises owned by Steyning Town Council including letting, maintenance, Health & Safety, staffing and cleaning.

2.4.10 Matters specifically delegated by Council or, any other committee.

2.4.11 Oversee maintenance contracts relevant to the committee and make any recommendations to F&GP.

2.4.12 More generally, to deal with any matter that it would serve to benefit the Council, by this committee making decisions related to Town Planning and Steyning Town Council Premises/ Assets, that have not already been stated above, and as per agreed to be placed on an Agenda by the Clerk and the Committee's Chair.

2.5 Personnel Committee

All matters (except for creating Council Policy) relating to:

2.5.1 Those responsibilities delegated in the absence of the Town Clerk at the table referred to in 3.1.2.

2.5.2 All personnel matters not delegated to officers or Sub-Committees.

2.5.3 Make recommendations to Council or F&GP on all staffing matters including salaries

2.5.4 Oversee the recruitment and appointment of staff.

2.5.5 To support and appraise the Clerk of the Council and ensure that as the Proper Officer and Financial Officer the Clerk is complying with the job description and delegated authority and make recommendations to Council as necessary.

2.5.6 Amend staff structure to reflect the Council's performance needs so long as within budget. Any changes requiring additional budget require Council approval.

2.5.7 To manage the provision of training of Officers and all staff and Councillors.

2.5.8 Consider and deal with all potential disciplinary matters relating to the Town Clerk including the commissioning of external advisors and/or investigation in accordance with the provisions of the Council's complaints and disciplinary procedures.

2.5.9 Consider and resolve all staff appeals concerning grievance or disciplinary matters.

2.5.10 Consider and resolve appeals to decisions relating to a Staff complaint, where this is unable to be dealt with by Officers.

2.5.11 Consider all appeals against decisions relating to Staff where this is available within a policy.

2.5.12 Matters specifically delegated by Council or, any other committee.

2.5.13 Legal responsibility for the decisions and actions of the Committee remains with the Council as a whole.

2.5.14 Consider agreement on Staff incremental pay rises subject to satisfactory performance, usually managed by a performance management system and appraisal.

3 Delegation to Officers

The following matters are delegated to the Council's Officers to make decisions on behalf of the Council. These decisions must be exercised in accordance with the law, the Council's Standing Orders and Financial Regulations and any approved policy framework and budget.

The Council may at any time, following resolution, revoke any delegated authority.

Officers may decide not to exercise delegated responsibilities and may instead make a recommendation to a Committee or the Council. Similarly, where Officers have no delegated power to make a decision, they report the matter to Committee or the Council for a decision.

3.1 Town Clerk – Proper Officer & Responsible Financial Officer

3.1.1 The Town Clerk shall be the Proper Officer and Responsible Financial Officer of the Council as defined in law.

3.1.2 See the table at 3.1.23 for the Town Clerk's delegated responsibilities and for the delegation arrangements in the Town Clerk's absence

3.1.3 Proper administration of the Council's financial affairs.

3.1.4 Report to External Auditor matters under Local Government Finance Act 1988 s114.

3.1.5 Ensure compliance with Financial Regulations.

3.1.6 Ensure compliance with all financial procedures.

3.1.7 Determine accounting policies, records and control systems.

3.1.8 Manage risk management of the Council.

3.1.9 Overall responsibility, and the day to day management of all council employees.

3.1.10 Arrange and manage the Council's insurance arrangements.

3.1.11 Day to day management of land, buildings and other resources.

3.1.12 Management of maintenance contracts and where necessary, to enter into new contracts using the procedure laid out within the STC 'Finance Regulations Policy.

3.1.13 Overall responsibility for Health & Safety across all Council owned sites

3.1.14 Developing income generating activities for the Steyning Centre with the Deputy Town Clerk.

3.1.15 Responsible for the management of the budget in accordance with Council Policy.

3.1.16 Ensure that employees and councillors follow the policies and protocols of the Council.

3.1.17 Dealing with all FOI/SAR requests as per the FOI Policy and report these to F&GP.

3.1.18 Dealing with all complaints as per the Complaints Policy.

3.1.19 Management of recruitment and payroll of Council employees in accordance with contracts of employment and the currently adopted staff structure and pay scales .

3.1.20 Consider and resolve all staff grievances in accordance with Grievance Policy.

3.1.21 Consider and deal with all staff disciplinary matters in accordance with Disciplinary policy.

3.1.22 Consider potential disciplinary matters relating to the Deputy Town Clerk and make recommendations to the Personnel Committee in accordance with the provisions of the Council's complaints and disciplinary procedures

3.1.23 The following responsibilities of the Town Clerk are delegated as follows in the absence of the Town Clerk.

Delegated responsibilities in the absence of the Town Clerk:

	Delegated Responsibility	Responsible in Absence
a.	The responsibilities and duties of the role of Proper Officer as set out within law and Council policies.	Deputy Town Clerk
b.	Issue all statutory notifications.	Deputy Town Clerk
c.	Receive Declarations of Acceptance of Office.	Deputy Town Clerk
d.	Receive and record notices disclosing pecuniary interests.	Deputy Town Clerk
e.	Receive and retain documents and plans.	Deputy Town Clerk
f.	Hold the Council's Seal and apply it to documents as approved.	Deputy Town Clerk
g.	Sign notices or other documents on behalf of the Council.	Deputy Town Clerk
h.	Receive copies of By-laws made by principal authority.	Deputy Town Clerk
i.	Prepare agendas and minutes for all committee meetings	Deputy Town Clerk
j.	Sign summons to attend meetings.	Deputy Town Clerk
k.	Ensure compliance with Standing Orders.	Deputy Town Clerk
l.	Manage all Town Council staff, either directly or indirectly.	Deputy Town Clerk
m.	Manage the provision of Council services, buildings, land and resources.	Deputy Town Clerk
n.	Incur expenditure in an emergency up to £1,000 whether budgeted or not.	Deputy Town Clerk
o.	Act on behalf of the Council in an urgent situation and report back to the Council as soon as practical.	Deputy Town Clerk
p.	Deal with dispensation requests from Members under the Code of Conduct.	Deputy Town Clerk
q.	Deal with matters specifically delegated by Council or Committee.	Deputy Town Clerk
r.	Take all decisions relating to the training of Councillors & staff.	Council/Personnel Committee/Deputy Town Clerk
s.	Appoint all employees in accordance with the Council's staff structure.	Council/Personnel Committee/D. Town Clerk
t.	Authorise minor non-fiscal adjustments to contracts of employment and job descriptions to meet the needs of the Council.	Council/Personnel Committee/Deputy Town Clerk
u.	Appoint casual / temporary members of staff as needed to meet the business needs of the Council and within existing budgets.	Council/Personnel Committee/Deputy Town Clerk

v.	Authorise additional hours of work for existing staff on a temporary basis to support the business needs of the Council.	**Council/Personnel Committee/Deputy Town Clerk**
w.	Deal with all disciplinary matters and hearings in accordance with the Council's Disciplinary Policy, including suspending employees as deemed necessary.	**Council/Personnel Committee/Deputy Town Clerk**
x.	Responsible for the overall management of all budgets in accordance with Council policies.	**Council/F&GP Committee/Deputy Town Clerk**
y.	Authorised to issue press releases on any Council activity exercised in accordance with Council policy.	**Deputy Town Clerk**
z..	Overall responsibility for Health & Safety across all Council owned sites.	**Council/F&GP Committee/Deputy Town Clerk**
aa.	Matters specifically delegated within Council policies.	**(broadly speaking)** **Financial Policies – Council/F&GP Committee/Deputy Town Clerk** **Personnel Policies – Council/Personnel Committee** **Freedom of information / Consultation Policies – Council/FOI Panel/ Deputy Town Clerk** **To be assessed individually by Council as and when required.**

3.2 Deputy Town Clerk

3.2.1 Those responsibilities delegated in the absence of the Town Clerk at the table referred to in 3.1.2.

3.2.2 Dealing with and resolving complaints received by the Council (except those regarding the actions or conduct of Councillors or Council employees), in accordance with the Complaints Procedure.

3.2.3 Day to day management of the Steyning Centre.

3.2.4 Day to day management of the Council's website and social media activities.

3.2.5 Day to day management of caretakers.

3.2.6 Authorising expenditure within budgeted levels in areas of responsibility and those delegated by the Town Clerk.

3.2.7 Developing income generating activities for the Steyning Centre with the Town Clerk.

3.2.8 Matters specifically delegated by Council or Committee.

Adopted by Full Council - 18th May 2026

Appendix 1.

{Excerpt from STC Financial Regulations – Agreed 2020}

4. BUDGETARY CONTROL AND AUTHORITY TO SPEND

4.1*. Expenditure on revenue items may be authorised up to the amounts included for that class of expenditure in the approved budget. This authority is to be determined by:*

• the council for all items over £5,000.

• prior approval by delegated committee for items - £1,000 to £5,000

• Clerk can order goods and services before speaking with Chairman but making Chairman of committee or Finance & General Purposes aware of this decision for items - £500 - £1,000.

• Clerk has authority to spend within the budget heading for items - £0 - £500.

When required, such authority is to be evidenced by a minute or by an authorisation slip duly signed by the RFO, and where necessary also by the appropriate Chairman. Contracts may not be disaggregated to avoid controls imposed by these regulation

DATA PROTECTION POLICY

Agreed by Full Council 18th May 2026

LOCAL COUNCIL AWARD SCHEME FOUNDATION

Parish Clerk: John Fullbrook
Deputy Clerk: Leanne Poole

Email:clerk@steyningpc.gov.uk
Email: leanne.poole@steyningpc.gov.uk

One of the Council's roles is to encourage community involvement and participation; publication of some personal information is integral to this aim. At the same time, such publication must minimise any potential negative impact on individuals, e.g. intrusive marketing or identity theft.

The Council is bound by law to abide by the provisions of the Data Protection Act 1998. The eight principles of the act are given at the end of this Policy along with a link to the full online definition of the Act. It should be noted that any individual has the right to make a complaint to the Information Commissioner and that any upheld complaint against the Council could result in a fine.

The simplest way of ensuring compliance is to adopt a simple set of over-arching principles, since individuals acting for the Council may not be familiar with the full Act. The following principles apply:

Principle 1: Permission

The Council will not gather or publish any personal data unless the purpose of the data is made clear to, and permission has been obtained from, the data owner.

Principle 2: Single Use

Any personal data gathered as above will not be used for any purpose other than that stated when it was obtained. For example, if the Council gathers personal data for a paper publication it may not subsequently publish that data on the internet, and vice versa.

Principle 3: Protection of Electronic Data

The Council will ensure the safe keeping of any electronic files containing personal data and will not release those files to any external party except for the purpose of printing or publication. The Council will require that any files thus released are deleted after use.

As further protection, avoid presenting long lists of personal data. In general, contact information should be "dotted around" and presented in the context of other information. This is because there are always people who will use data from the internet for purposes other than that intended. An example would be gathering contact lists for onward sale; in this case, understanding the demographic or locality of contacts makes them more valuable. The way data is presented online may deter such misuse.

The Data Protection Act 1998
For full information see: http://www.ico.gov.uk/for_organisations/data_protection.aspx
The following are the eight principles of the Act reproduced from UK Government web site above:

1. Personal data shall be processed fairly and lawfully and, in particular, shall not be processed unless:

(a) at least one of the conditions in Schedule 2 is met, and
(b) in the case of sensitive personal data, at least one of the conditions in Schedule 3 is also met.

2. Personal data shall be obtained only for one or more specified and lawful purposes, and shall not be further processed in any manner incompatible with that purpose or those purposes.

3. Personal data shall be adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed.

4. Personal data shall be accurate and, where necessary, kept up to date.

5. Personal data processed for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

6. Personal data shall be processed in accordance with the rights of data subjects under the Act.

7. Appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data.

8. Personal data shall not be transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.

Agreed: **May 2023**
Reviewed: **May 2025**

Parish Clerk: John Fullbrook Email:clerk@steyningpc.gov.uk
Deputy Clerk: Leanne Poole Email: leanne.poole@steyningpc.gov.uk

STEYNING TOWN COUNCIL BREACH NOTIFICATION POLICY

1. SCOPE

1.1. This procedure applies in the event of a personal data breach under Article 33 Notification of a personal data breach to the supervisory authority, and Article 34 Communication of a personal data breach to the data subject of the GDPR.

1.2. The GDPR draws a distinction between a 'data controller' and a 'data processor' in order to recognise that not all organisations involved in the processing of personal data have the same degree of responsibility. Therefore, each organisation, should establish whether it is data controller, or a data processor for the same data processing activity; it must be one or the other.

2. RESPONSIBILITY

2.1. All users (whether Employees/Staff, contractors or temporary Employees/Staff and third-party users) and Councillors of Steyning Town Council are required to be aware of, and to follow this procedure in the event of a personal data breach.

3. PROCEDURE – BREACH NOTIFICATION DATA PROCESSOR TO DATA CONTROLLER

3.1. Steyning Town Council shall report any personal data breach to the data controller (Clerk) without undue delay who will pass details to the Data Protection Officer. (GDPR-Info Ltd)

3.2. GDPR-info Ltd notifies their contact within the data controller, which is recorded in the Internal Breach Register.

3.3. Notification is made by [email, phone call, etc.].

3.4. Confirmation of receipt of this information is made by email.

4. PROCEDURE – BREACH NOTIFICATION DATA CONTROLLER TO SUPERVISORY AUTHORITY

4.1. GDPR-Info Ltd shall notify the supervisory authority (ICO) without undue delay, of a personal data breach.

4.2. 4.1 GDPR-Info Ltd assesses whether the personal data breach is likely to result in a risk to the rights and freedoms of the data subjects affected by the personal data breach.

4.3. If a risk to the aforementioned is likely, GDPR-Info Ltd shall report any personal data breach to the supervisory authority without undue delay, and where feasible not later than 72 hours. Where data breach notification to the supervisory authority is not made within 72 hours, it shall be accompanied by the reasons for the delay.

4.4. The data controller (Clerk) shall provide the following information to the supervisory authority on a Breach Notification Form:

4.5. A description of the nature of the breach

4.6. The categories of personal data affected

4.7. Approximate number of data subjects affected

4.8. Approximate number of personal data records affected

4.9. Name and contact details of GDPR-info Ltd

4.10. Likely consequences of the breach

4.11. Any measures that have been or will be taken to address the breach, including mitigation

4.12. The information relating to the data breach, which may be provided in phases.

4.13. GDPR-info Ltd notifies their contact within the supervisory authority, which is recorded in the Internal Breach Register

4.14. Notification is made by [email, phone call, etc.].

4.15. Confirmation of receipt of this information is made by email.

5. PROCEDURE – BREACH NOTIFICATION DATA CONTROLLER TO DATA SUBJECT

5.1. Where the personal data breach is likely to result in high risk to the rights and freedoms of the data subject Steyning Town Council shall notify the affected data subjects without undue delay, [using this form/in accordance with GDPR-info Ltd.'s recommendations].

5.2. The notification to the data subject shall describe in clear and plain language the nature of the breach including the information specified at 4.4 above.

5.3. Appropriate measures have been taken to render the personal data unusable to any person who is not authorised to access it, such as encryption.

5.4. The controller has taken subsequent measure to ensure that the rights and freedoms of the data subjects are no longer likely to materialise.

5.5. It would require a disproportionate amount of effort. In such a scenario, there shall be a public communication or similar measure whereby the data subject is informed in an equally effective manner.

5.6. The supervisory authority may where it considers the likelihood of a personal data breach resulting in high risk require the data controller to communicate the personal data breach to the data subject.

Adopted by Full Council 18th May 2026

STEYNING TOWN COUNCIL SUBJECT ACCESS REQUEST POLICY

1. Scope

All personal data processed by Steyning Town Council is within the scope of this procedure. This procedure excludes personal data that is asked for as a matter of routine by data subjects

Data subjects are entitled to ask

• Whether Steyning Town Council is processing any personal data about that individual and, if so, to be given:

- a description of the personal data;
- the purposes for which it is being processed; and,
- details of who will be allowed to see the personal data.

• To be given a copy of the information and to be told about the sources from which Steyning Town Council derived the information; and

• Where appropriate, logic involved in any automated decisions relating to them.

2. Responsibilities

GDPR-info Ltd are responsible for the application and effective working of this procedure, and for reporting to the Town Clerk on Subject Access Requests (SARs).

GDPR-info Ltd is responsible for handling all SARs.

3. Procedure

3.1 Subject Access Requests must be made using our web page https://gdpr-info.com/data-protection-contact-form/

3.2 The data subject must provide evidence as to identity.

3.3 The data subject must identify the data that is being requested and where it is being held and this information must be shown on the SAR application form. Note that the data subject is entitled to ask for all data that Steyning Town Council holds, without specifying that data.

3.4 The date by which the identification checks, and the specification of the data sought must be recorded; Steyning Town Council has one month from this date to provide the requested information. There are no circumstances in which an extension to that one month will be provided, and failure to provide the requested information within that one month is a breach of the GDPR.

3.5 The SAR application is immediately forwarded to GDPR-info Ltd, who will ensure that the requested data is collected within the time frame.

Collection will entail either:

3.5.1 Collecting the data specified by the data subject, or

3.5.2 Searching all databases and all relevant filing systems (manual files) in Steyning Town Council, including all back up and archived files, whether computerised or manual, and including all e-mail folders and archives. The Town Clerk maintains a data map that identifies where all data in Steyning Town Council is stored.

3.6 GDPR-info Ltd maintains a record of requests for data and of its receipt, including dates. Note that data may not be altered or destroyed in order to avoid disclosing it.

3.7 GDPR-info Ltd is responsible for reviewing all provided documents to identify whether any third parties are identified in it and for either excising identifying third party information from the documentation or obtaining written consent from the third party for their identity to be revealed.

3.8 If the requested data falls under one of the following exemptions, it does not have to be provided:

3.8.1 Crime prevention and detection.

3.8.2 Negotiations with the requester.

3.8.3 Management forecasts.

3.8.4 Confidential references given by Steyning Town Council (not ones given to Steyning Town Council).

3.8.5 Information used for research, historical or statistical purposes.

3.8.6 Information covered by legal professional privilege.

3.9 The information is provided to the data subject in electronic format unless otherwise requested and all the items provided are listed on a schedule that shows the data subject's name and the date on which the information is delivered.

3.10 The electronic formats used for responses to SARs are:

3.10.1 .CSV file

Adopted by Full Council 18th May 2026

Freedom of Information

&

Environmental Information Regulations

Requests Policy

1.0 Background

Under the Freedom of Information Act, individuals have the right to access information held by the Council. The Council must also advise and assist the individual in making their request.

The Freedom of Information Act 2000 (FOIA) was passed on 30th November 2000. It gives a general right of access to all types of recorded information held by public authorities. It sets out exemptions from that right and places a number of obligations on public authorities.

The Act came into force in January 2005 and anyone wishing to exercise the right has to make a written request to the local authority. If such a request is made the Council is under obligation to inform the person whether or not the requested information exists and to supply access to the information, unless it is subject to an exemption.

Section 39 of the Freedom of Information Act exempts environmental information from being dealt with under the Freedom of Information Act and provides it should be dealt with under the Environmental Information Regulations [EIR], which also came into force on 1st January 2005.

Environmental Information is defined in the EIR as information falling into one of the six categories below:

1. the state of the elements of the environment, such as air and atmosphere, water, soil, land, landscape and natural sites including wetlands, coastal and marine areas, biological diversity and its components, including genetically modified organisms and the interaction among these elements.
2. factors, such as substances, energy, noise, radiation or waste, including radioactive waste, emissions, discharges and other releases into the environment, affecting or likely to affect the elements of the environment referred to in 1.
3. measures (including administrative measures), such as policies, legislation, plans, programmes, environmental agreements, and activities affecting or likely to affect the state of the elements and factors mentioned above, and as well as measures or activities designed to protect those elements.
4. reports on the implementation of environmental legislation.
5. cost-benefit and other economic analyses and assumptions used within the framework of the measures and activities referred to above.
6. the state of human health and safety, including the contamination of the food chain, where relevant, conditions of human life, cultural sites and built structures in as much as they are or may be affected by the state of the elements of the environment or, through those elements by any of the factors or measures referred to above.

2.0 Procedure

The FOIA requires that all requests must be made in writing (by letter or email) whereas the EIR also allow requests for environment information to be made verbally. Requests must clearly indicate what information is being required and state the name of the applicant and contact details for correspondence. Applicants do not have to state the purpose of their request.

2.1 Any individual making an enquiry under the FOIA should be advised that all requests for information must:

- be made in writing, including email.
- include a name and address for the response to be sent to.
- state clearly the information required.

2.2 Any individual making an enquiry, written or verbal, under the EIR should be advised that all requests for information must:

- include a name and address for the response to be sent to.
- state clearly the information required.

2.3 On receipt of a request for information under the FOIA or EIR, an acknowledgement should be sent out within three working days advising whether the information is subject to the Act or not and how the Council will be responding to the request.

Where the request is deemed to be contentious the Responsible Officer may convene an FOI panel to assist him with the compilation of the response

Where the information is subject to the Act or Regulations, it should be dealt with accordingly and a response given to the enquirer within 20 working days. The Act or Regulations allow the Council to extend this deadline if further clarification of the request is needed but must advise the individual accordingly.

Where the information is <u>not</u> subject to the Act, it should be dealt with in line with the Council's complaints procedure.

2.4 Most requests for information will be free of charge. However, the Council reserves the right to charge the enquirer for photocopies or postage.

The individual may request that the information be given to them in a particular form and the Council may take into account the cost of providing the information in this form before complying with the request.

If the Council believes that it will cost more than £450 to find the information and prepare it for release, then the request can be refused. However, in all such cases the Council will ask the enquirer to narrow down the request by being more specific.

2.5 The FOIA and EIR do not place restrictions on how the individual may use the information, but does not transfer copyright in any information sent to the enquirer. The Council should advise the enquirer in writing if any of the information is copyrighted.

2.6 Under Section 36 of the Freedom of Information Act 2000 the Clerk together with the Chairman/Chairman of the relevant committee will make decisions about the disclosure of information that is believed to prejudice the conduct of public affairs. In the absence of the Clerk, this will be performed by the Deputy Clerk together with the Chairman / Chairman of the relevant committee.

2.7 If the Council refuses a request or withholds some of the information that has been requested, the enquirer will be advised of the reasons for the refusal. (see Section 3.0 Exemptions).

2.8 Under Section 16 of the FOIA and Section 9 of the EIR, the Clerk has a duty to provide advice and assistance to applicants. The Council will provide advice and assistance so far as it would be reasonable to expect it to do so to anybody who proposes to make or have made an Information Request.

2.9 Where the cost of compliance in providing the information to a number of related requests, whether from the same or different individuals, exceeds the "appropriate limit" the Council will not be obliged to comply with the request. However, the Council may, on a discretionary basis, be prepared to offer assistance as to what could be disclosed in a more cost effective manner. It will be a matter for the Council to determine whether the various requests are related and form part of an organised campaign.

2.10 If the Council receives an Information Request for information that it does not hold, but is aware that another public authority holds this information, the Council will provide assistance to the applicant and transfer their request to the public authority known to hold the requested information. If the Council holds any part of the information that has been requested by the applicant it will treat that part of the request as an official Information Request and process it accordingly.

3.0 Exemptions

3.1 In certain instances, the Council will withhold information if it considers an information disclosure would be subject to one or more of the exemptions included in the FOIA and EIR, e.g.

- Regulation 12(3) Personal Information

- Regulation 12(4) – exemptions based on the type of information:
    - Regulation 12(4)(a) – the Council does not hold the information
    - Regulation 12(4)(b) – the request for information is manifestly unreasonable
    - Regulation 12(4)(c) – the request is too general
    - Regulation 12(4)(d) – the request relates to information which is unfinished or in the course of being completed
    - Regulation 12(4)(e) – the request involves the disclosure of internal communications.

- Regulation 12(5) – exceptions based on the content of the information requested
    - Regulation 12(5)(a) – international relations, defence, national security and public safety.
    - Regulation 12(5)(b) – the course of justice, the ability of a person to obtain a fair trial or the ability of a public authority to conduct an inquiry of a criminal or disciplinary nature.
    - Regulation 12(5)(c) – Intellectual property rights.
    - Regulation 12(5)(e) – the confidentiality of commercial or industrial information where such confidentiality is provided by law to protect a legitimate economic interest.
    - Regulation 12(5)(f) – the interests of the supplier of the information
    - Regulation 12(5)(g) – Protection of the environment

- Regulation 12(6) and (7) – Neither confirm nor deny

- Regulation 12(9) – Emissions

3.2 The Council will always explain its reasons for applying an exemption to the applicant within 20 days.

3.3 The Council will not classify information as exempt unless there are reasons for doing so. Where documents contain exempt information, the remaining information contained within the requested document will be available under the FOIA and EIR.

3.4 Qualified exemptions will only be applied if the Council believes it is not in the public interest to disclose the information having considered the Public Interest Test.

4.0 Public Interest Test

4.1 The Public Interest Test (PIT) will apply to all qualified exemptions under the FOIA. The PIT requires that information should be withheld under an exemption if, in all the circumstances of the case, the public interest in maintaining the exemption outweighs the public interest in disclosing the information.

5.0 Appeals

5.1 If the Council refuses a request for information, the individual has the right to appeal the decision and should, in the first instance, request an internal review of the decision in writing within 5 working days of notification of the refusal.

5.2 The Council does have the right to refuse to review the decision.

5.3 The review should be conducted by a panel of three Councillors who were not connected with the initial decision having been appointed by Full Council. The Chairman or Vice Chairman will Chair the review. The individual should be advised of the outcome of the review within 15 working days.

5.4 If the individual is unhappy with the outcome of the review, or the Council has refused to undertake a review, the individual has the right to appeal directly to the independent Information Commissioner. The Commissioner has the power to investigate the way the Council handled the request and the response given by the Council. If the Commissioner agrees that the Council has wrongly withheld information, the Council can be ordered to disclose it.

The Information Commissioner can be contacted as follows:

Information Commissioner's Office Helpline:
08456 30 60 60 or 01625 54 57 45 Fax: 01625 524510

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Adopted by Full Council on 18th May 2026

Steyning Town Council

Dignity at Work / Bullying and Harassment Policy

Purpose and Scope

1.1 Statement:

1. In support of our value to respect others, Steyning Town Council will not tolerate bullying or harassment by, or of, any of its employees, councillors, contractors, visitors to the council or members of the public from the community which we serve.

2. The Council is committed to the elimination of any form of intimidation in the workplace.

3. This policy reflects the spirit in which the Council intends to undertake all of its business and outlines the specific procedures available to all employees and councillors in order to protect them from bullying and harassment and create a working environment where they have the confidence to raise a complaint.

4. It should be read in conjunction with the Council's policies on Grievance and Disciplinary handling, the Councillors' Code of Conduct and the Council's Social Media Policies.

5. The Council will issue this policy to all employees as part of their induction and to all councillors as part of their Welcome Pack. The Council may share this policy with contractors, visitors and members of the public.

1.2 Definitions:

6. Bullying "Bullying may be characterised as a pattern of offensive, intimidating, malicious, insulting or humiliating behaviour; an abuse of the use of power or authority which tends to undermine an individual or a group of individuals, gradually eroding their confidence and capability, which may cause them to suffer stress."

7. Harassment is "unwanted conduct that violates a person's dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment." This usually covers, but is not limited to, harassment on the grounds of sex, marital status, sexual orientation, race, colour, nationality, ethnic origin, religion, belief, disability or age. These definitions are derived from the ACAS guidance on the topic.

8. Bullying and Harassment are behaviours which are unwanted by the recipient. They are generally evidenced by a pattern of conduct, rather than being related to one-off incidents.

9. Bullying and harassment in the workplace can lead to poor morale, low productivity and poor performance, sickness absence, mental health issues, lack of respect for others, staff or councillor turnover, damage to the council's reputation and ultimately, legal proceedings against the council and payment of legal fees and potentially unlimited compensation.

1.3 Examples of unacceptable behaviour are as follows:

10. Spreading untrue or inflammatory claims, malicious rumours, insulting someone, ridiculing or demeaning someone, exclusion or victimisation, unfair treatment, overbearing supervision or other misuse of position or power, unwelcome sexual advances, making threats about job security, making threats of physical violence against a person or their family, deliberately undermining a competent worker by overloading work and/or constant criticism, blaming a person for others' mistakes, preventing an individual's promotion or training opportunities.

11. Bullying and harassment may occur face-to-face, in meetings, through written communication, including electronic communication such as e-mail or on social media, by telephone or through automatic supervision methods. It can be verbal, non-verbal or physical in nature. It may occur on or off work premises, during work hours or non-work time.

1.4 Penalties/Sanctions:

12. Bullying and harassment by any employed persons can be considered examples of gross misconduct which will be dealt with through the Disciplinary Procedure at Gross Misconduct level and may result in summary dismissal from the Council.

13. If a councillor is bullying or harassing employees, contractors, other councillors or others then a referral through the Standards process in place at the time reported as a contravention of the Member's Code of Conduct will be the appropriate measure if any formal action with a potential sanction is considered appropriate.

14. If an employee or a councillor is experiencing bullying or harassment from a third party the Council will act reasonably in upholding its duty of care towards its own employees and its duty to enforce this policy concerning councillors.

15. Harassment can constitute a criminal offence or give rise to a damages claim and the Council will take appropriate legal advice, often available from the Council's insurer, if such a matter arises.

1.5 The Legal position:

16. Councils have a duty of care towards all their workers and liability under common law arising out of the Employment Rights Act 1996 and the Health and Safety at Work Act 1974.

17. If an employer fails to act reasonably with regard to this duty of care by allowing bullying or harassment to continue unchallenged an employee may decide to resign and claim 'constructive dismissal' at an Employment Tribunal.

18. Under the Equality Act 2010 bullying or harassment related to one of the protected characteristics covered by the Act (age, gender, marital status, sexual orientation, race, religion, belief, colour, disability) can be considered unlawful discrimination which could lead to an Employment Tribunal claim for discrimination against the corporate employer, the Council and the perpetrator(s) as individual named Respondents. Any individual bringing a claim does not have to have the specific characteristic themselves.

19. In addition, the Criminal Justice and Public Order Act 1994 and Protection from Harassment Act 1997 created a criminal offence of harassment with a fine and/or prison sentence as a penalty and a right to damages for the victim.
20. A harasser may be personally liable to pay damages if a victim complains to an Employment Tribunal on the grounds of discrimination.
21. A 'course of conduct' needs to be established under the 1997 Act. This can include linking incidents which are separated by long time periods. Damages for personal injury and distress can be awarded.
22. While the Council does not have the same statutory duty of care towards its councillors it has resolved to apply the principles of this policy to councillors.

1.6 Process for dealing with complaints of Bullying and Harassment

Informal approach

23. Anyone; employee, councillor, contractor or visitor, who feels they are being bullied or harassed should try to resolve the problem informally, in the first instance. It may be sufficient to explain to the person(s) involved in the unwanted behaviour, or an intermediary, that their conduct is unacceptable, offensive or causing discomfort as it is possible that the person is not aware that their behaviour is unwelcome. This may be explained verbally, or in writing if this is more comfortable.
24. Anyone concerned about being bullied or harassed is encouraged to maintain a journal or other record of the incidents.

Formal approach

All complaints will be investigated with sensitively, fairly and objectively in strict confidence in order to uphold the rights of the complainant and the alleged perpetrator. The outcome, and in particular any sanction, may not be kept confidential, however the views of a successful complainant will be given great weight before any information is disclosed.

25 **Employees**: Where the employee feels unable to resolve the matter informally any complaint about harassment or bullying can be raised confidentially and informally, initially with the Chair of the Staffing/Personnel committee, their line manager, or another Councillor if more appropriate. It may be appropriate for the complaint to be put in writing after the initial discussion, as this will enable the formal Grievance Procedure to be invoked. The employee will be expected to provide evidence of the conduct about which he/she is complaining. If the employee is seeking any sanction against an individual councillor then this must be dealt with through the Members' Code of Conduct process administered by Horsham District Council HDC)

26 **Councillors**: Any councillor, who feels he or she is being bullied or harassed whether by another councillor, an employee or a member of the public should raise their complaint with the Council if an informal notification to the alleged perpetrator has been unsuccessful at eliminating the problem. The Council will give appropriate support and guidance to enable the complainant to refer the matter to HDC under the Code of Conduct process if it concerns a councillor and may use its disciplinary procedure in the case of an employee.

27 **A member of the public** who feels he/she has been bullied or harassed by any councillor or officer of the Council should use the Council's official Complaints Procedure if it concerns an employee, or the Code of Conduct procedure administered by HDC in the case of a councillor. A formal approach to the Clerk or to the Chairman, as appropriate, is encouraged first in the hope of achieving informal resolution.

28 **Grievance –Employees only.** A meeting to discuss the complaint with the aggrieved party will normally be arranged within five working days of a written complaint being received and will be held under the provisions of the Council's Grievance Procedure. This meeting will be to discuss the issues raised and a way forward for the member(s) of staff involved. Employees have a right to be accompanied by a work colleague or a trade union representative at this meeting.

29 A full investigation of the complaint will be held by an officer, or other duly appointed person as appointed by the Finance and General Purposes Committee. It may be appropriate for an external investigator to be involved in order to maintain objectivity and impartiality.

30 The hearing panel will publish its recommendations following deliberation of the facts. An action plan should be made available to the aggrieved employee to demonstrate how the problem is to be resolved. It may be decided that mediation or some other intervention is required, and the Council should contact NALC, an employer's body or ACAS to this effect, or the Council may offer counselling. The employee will have a right of appeal.

31 At all times the confidentiality of the grievance will be of paramount importance in order to maintain trust in the process hence details of the full grievance will not be shared with the full Council without prior approval by the aggrieved party.

32 The Council commits not to victimize the aggrieved for raising the complaint once the appropriate dispute resolution process has been concluded however, if during the investigation a complaint is found to be vexatious, made with malicious intent and/or not made in good faith, then a grievance may be brought against that person in accordance with the Council's Grievance Procedure or under its employment disciplinary procedures.

33 **Disciplinary Action** Following a Grievance Hearing or investigation into allegations of bullying or harassment a full report will be made to all parties and this may result in disciplinary action being taken against the perpetrator of the alleged action/behaviour.

34 **For an Employee** found to have been bullying/harassing others this will follow the Council's Disciplinary procedure under the ACAS Code of Practice and would normally be treated as Gross Misconduct.

35 **For Councillors** If informal resolution satisfactory to the other party cannot be achieved then any investigation and potentials action must use the Code of Conduct procedure administered by HDC.

36 In some cases, counselling or training in appropriate skill areas e.g. inter-personal communication, assertiveness, chairmanship etc. on a voluntary basis may be more appropriate than a referral under the Code of Conduct process for investigation and possible penalty. Resolution may include (but are not limited to) voluntarily accepting an admonishment, issuing an apology or giving an undertaking not to repeat the behaviour, surrendering opportunities to further harass/bully such as resignation from a committee(s) where direct contact with the complainant or other affected parties or decision-making about that complainant may take

place, or resigning from representation on any outside bodies where there may be contact with the complainant or other affected parties.

37 A referral under the Code of Conduct is usually the appropriate step.

38 A referral to the Police or civil action under the Protection from Harassment Act 1997 may also be appropriate in the more extreme cases.

39 **For members of the Public** The allegation will be dealt with under the STC Unacceptable Behaviour Policy

False or malicious allegations of harassment or bullying which damage the reputation of another employee/councillor will not be tolerated and will be dealt with as potentially serious misconduct

Last Reviewed by Working Practices Group 4 June 2020

Adopted by Full Council 18th May 2026

Communications Protocol

1. INTRODUCTION
This Protocol has been drawn up in accordance with the "Governance Toolkit for Town and Town Councils" prepared as a partner publication by Association of Council Secretaries and Solicitors, Society of Local Council Clerks, and NALC.

2. AIMS
The Communications Protocol aims to help Steyning Town Council communicate effectively and impartially.

3. GENERAL PRINCIPLES (COMMUNICATIONS WITH THE MEDIA AND MEMBERS OF THE PUBLIC)
3.1 The Council's communications will be open and transparent in dealing with the media.
The purpose of press releases is to increase public awareness of the Town Council's activities. All press releases must be submitted by the Clerk, who will consult the Chair or Vice-Chair, or the Town Council as the corporate body when drafting the press release.

3.2 Proactive media releases will be issued to promote a decision or work of the Town Council.
Reactive press releases will be prepared and issued in response to a specific question or as a rebuttal to an article already published. Such statements should be dealt with in a timely manner.
Other press releases will report the decisions and outcomes of the Council's activities and explain the reasons for them.

3.3 The media may on occasions attempt to by-pass the Clerk; however, it is essential that all communications are coordinated and managed through the Clerk. Where Town Councillors are contacted direct by the media, they should refer them to the Clerk.

3.4 The Town Council occasionally works with partners, mostly from the public sector, and in these circumstances, their contribution should be acknowledged.

3.5 Press reports from the Town Council, its committees or working groups shall, in general, be sent from the Clerk or via the reporter's own attendance at a meeting.

3.6 Unless a Town Councillor has been authorised by the Council to speak to the media on a particular issue, Town Councillors who are asked for comment by the press should make it clear that any views they express are personal and request that this be clearly reported as their personal view.

3.7 Unless a Town Councillor is absolutely certain that he/she is reporting the view of the Council, they must make it clear to members of the public that they are expressing a personal view. [The only clear way of being aware of the Council's view is if the matter has been discussed at a Town Council meeting, and a decision made on that item.]

3.8 Press releases will not be used to comment on national political debates unless of specific relevance to this Town Council.

3.9 All media releases issued by the Council will include a quotation from the Chairman (or, in his/her absence, the Vice-Chairman, if there is one); if it is not possible to contact the Chairman or Vice-Chairman a quotation will be attributed to the Chairman.

3.10 The Clerk will usually be the first point of contact for the media; however, where it is appropriate for an elected Member to represent the Town Council, the Chairman or Vice-Chairman shall be authorised as the official spokesperson for the Council.

3.11 Individual Members will not be permitted to issue media releases on behalf of the Town Council. In the restricted period before an election, commonly known as "purdah" media releases will not include quotes from Members who are due for re-election.

4. TOWN COUNCIL CORRESPONDENCE

4.1 The first point of contact for the Town Council is the Clerk and it is to the Clerk that all correspondence for the Town Council should be addressed.

4.2 The Clerk should deal with all correspondence following a meeting.

4.3 No individual Town Councillor should communicate directly with companies/individuals with which the Town Council has a contractual relationship.

4.4 No individual Town Councillor should be the sole custodian of any correspondence or information in the name of the Town Council (or its committees/sub-committees). [In particular, Town Councillors do not have a right to obtain confidential information/documentation unless they can demonstrate a "need to know".] See 5.1

4.5 All official correspondence should be sent by the Clerk in the name of the Town Council, using Council letter-headed paper or by e-mail.

4.6 Where correspondence from the Clerk to a Councillor is copied to another person, the addressee should be made aware that a copy is being forwarded to that other person.

4.7 Correspondence sent on behalf of the Town Council to Horsham District Council shall also be copied to the two District Councillors.

4.8 Any emails to external parties, from the Town Council, should make it clear at the end of the email that it has come from the Town Council.

5. TOWN COUNCILLOR CORRESPONDENCE WITH EXTERNAL PARTIES

5.1 The Clerk sends out the Council's correspondence to other bodies, and correspondence from individual Town Councillors, on Town Council business, should be avoided; however, there may be exceptional situations when it is appropriate for a Town Councillor to issue correspondence in his/her own name. Such correspondence must be authorised by the Town Council and the correspondence must make it clear that it has been written in an official capacity. All such correspondence should be copied to the Clerk (see 4.4 and 4.5).

6. AGENDAS FOR TOWN COUNCIL MEETINGS

6.1 In accordance with Paragraph 1 (4) (a) of the Public Bodies (Admission to Meetings) Act 1960, agendas will be published no later than 3 clear days before a meeting (this excludes the day of publication and the day of the meeting – Saturdays are included within this calculation).

6.2 Where the Clerk or a Town Councillor wishes fellow Councillors to receive matters "for information only" in respect of items on the agenda, this will be circulated via the Clerk.
Note: This applies to items on the agenda only. Town Councillors are entitled to share any other information they wish, with their colleagues. In these circumstances, it can be helpful for the Clerk to be copied in.

7. GENERAL GUIDANCE

7.1 Steyning Town Council is apolitical. There should be no material used which attempts to promote the personal image of a particular Councillor, promote an individual Councillors' proposals or recommendations, or personalise issues. Nor should the Council assist in the publication of any material which does any of the above.

8. LEGAL MATTERS

8.1 Defamation: This term covers libel (written) and slander (spoken) and relates to the publication of any untrue statement about a person which is damaging to their reputation.

8.2 Data Protection: Avoid publishing the personal data and/or images of individuals unless their written permission has been obtained. **When e-mailing two or more recipients, be sure to 'blind copy' all recipients in order to avoid making the contact details of others available to all.**

8.3 Prejudice and Pre-determination: Councillors should avoid expressing prejudice or pre-determination on any topic due to be discussed and agreed by the Town Council.

8.4 Copyright: Placing images or text on the website, from a copy-righted source without permission is likely to breach copyright. Avoid publishing anything unless permission has been granted. Breach of copyright may result in an award of damages against the Town Council.

8.5 Obscene Material: It is a criminal offence to publish or access obscene material.

9. CODE OF CONDUCT IMPLICATIONS:

9.1 Councillors may have a social media account on which they comment as both an individual and a Councillor. It must at all times be made clear whether Councillors are posting as individuals or in their capacity as a Councillor. Aspects of the Members' Code of Conduct apply as much to on-line activity as they do to other written or oral communication. On-line content should be objective, balanced, informative and accurate. What is written on the Internet is permanent.

9.2 Comments should be respectful and informative, never condescending or "loud". "Loud" is when capital letters are used. Use sentence-case format.

9.3 Refrain from posting controversial or potentially inflammatory remarks. Language which could be deemed as offensive, especially in respect of race, sexuality disability etc. should not be published on any social media website.

9.4 Avoid personal attack, on-line fights and hostile communications.

9.5 Never use a member of public's name unless you have permission.

9.6 Respect the privacy of other Councillors and residents.

9.7 Be aware not to publish anything which violates laws or regulations.

9.8 In the main, Councillors have the same legal duties on-line as anyone else, but failure to comply with the law may have more serious consequences. Extra care needs to be taken for electoral campaigning and when writing on planning matters.

9.9 The Town Council Newsletter and Website will remain the main tools for the purposes of communicating information regarding the Town Council's activities.

Adopted by Full Council 18th May 2026

STEYNING TOWN COUNCIL COMPLAINTS PROCEDURE

1.This Complaints procedure covers complaints from the public or outside bodies about the administration of the council or its procedures and

2. Does not cover complaints about an employee of the Council i.e. the Clerk, Deputy Clerk or Caretakers. All complaints about employees are dealt with internally as an employment matter.

3. does not cover complaints about a Councillor acting or giving the impression of acting as such as these come under the jurisdiction of the Code of Conduct and are dealt with directly by the Horsham District Council

4. does not cover local electors' statutory right to object to the Council's audit of accounts (s.16 Audit Commission Act 1998)

5. does not cover criminal activity which is the responsibility of the police

This Complaints Procedure is intended to deal with those complaints that cannot be satisfied by less formal measures or explanations provided by the Clerk or other Proper Officer or Chairman of the Council.

In normal circumstances on receipt of a complaint the Clerk will:

1. Consult with the Chairman/Vice Chairman of the Town Council and/or the Chairman of the relevant committee.

2. Draft a response to the complainant and agree its content with the responsible Chairman/Vice Chairman.

3. A full written response to the complainant will then be sent by the Clerk.

4. If the complainant is not satisfied with this response and wishes to pursue the matter further then the following procedure will apply:

A Review will be undertaken by a review panel of the Council which will be nominated by the Chairman and Vice Chairman as and when required. This review group will be as independent as possible and will not comprise of members of the committee under whose jurisdiction the complaint falls unless the complaint relates to the full council.

The name of the complainant will only be made known to the review panel.

Review Procedure

Before the meeting.

1.The complainant should be asked to put the complaint about the Council's procedures or administration in writing to the Clerk (if this has already been done, the complainant should be asked to give any further new explanation as to why the original response is not acceptable).

2. If the complainant does not wish to put the complaint to the Clerk or other proper officer, they may be advised to put it to the Chairman of the Council.

3.The Clerk or the Chairman of the Council shall acknowledge receipt of the complaint and advise the complainant when the matter will be considered by the review panel established for the purposes of hearing the complaint.

4) The complainant shall be invited to attend the meeting of the panel and bring with them a representative, (normally no more than 2 other persons), in exceptional circumstances, and with prior agreement of the Chairman, more representatives may accompany the complainant.

5) 7 clear working days prior to the meeting, the complainant shall provide the Council with copies of any additional documentation or other evidence, which they wish to refer to at the meeting. The Council shall similarly provide the complainant with copies of any documentation upon which they wish to rely at the meeting

At the Review Meeting

1. Chairman to introduce everyone.

2. Chairman to explain procedure.

3. Complainant (or representative) to outline grounds for complaint.

4. Members to ask any question of the complainant.

5. If relevant, Clerk or other proper officer to explain on behalf of the Council, the Council's position.

6. Members to ask any question of the Clerk or other Proper Officer.

7. Clerk or other Proper Officer and complainant to be offered opportunity of last word (in this order).

8. Clerk or other Proper Officer and complainant to be asked to leave room while panel decides whether or not the grounds for the complaint have been made (if a point of clarification is necessary, both parties to be invited back).

9. Clerk or other Proper Officer and complainant return to hear decision or to be advised when decision will be made.

10. Any decision of the review panel will be final and will be reported at the next Full Council meeting

After the Meeting

1.The decision of the review panel will be confirmed to the complainant in writing within seven working days together with details of any action to be taken.

NOTE: A log of any written complaints or compliments will be kept.

Last Reviewed by Working Practices Group 19 February 2020

Adopted by Full Council 18th May 2026

Unacceptable Behaviour Policy

1.Introduction

1.1 This policy sets out the Council's approach to dealing with unacceptable behaviour by members of the public

It is anticipated the application will be minimal. However, the Council has a duty to safeguard its employees from unacceptable behaviour.   It will similarly protect its councillors

2.Policy Aims

2.1 Steyning Town Council aims to:

2.1.1 Deal fairly, respectfully and consistently with all. Employees of the Council and its councillors have the right to expect this to be reciprocal.

2.1.2 Manage an individual's contact with STC's employees and/ or councillors where it is considered that a person's behaviour or actions are unacceptable.

2.1.3 Ensure that employees and councillors each enjoy the same level of protection.

3.Definition

3.1 Unacceptable Behaviour

3.2.1 This includes the use of language (oral or written - including on social media) or behaviour that may cause employees or councillors to feel afraid, threatened, abused, bullied or the subject of harassment. Examples include threats, physical aggression, abuse, rudeness and the use of insulting and offensive remarks. Untrue or inflammatory statements and unsubstantiated allegations can also be abusive behaviour.

3.2.2 The Council has a zero-tolerance policy with regards to racist, sexist, ageist, homophobic or other prejudicial conduct related to 'protected characteristics' as defined in accordance with the Equality Act (2010).

4. Managing Unacceptable Behaviour

4.1 A person should almost always be given an opportunity to rectify their behaviour.

4.1.1 Employees or councillors should explain (through a third party if necessary) that they find someone's behaviour or language unacceptable and allow the person a chance to remedy, moderate or change the behaviour.

4.2 If the behaviour continues, employees and councillors should:

- End telephone calls if the caller is considered aggressive, abusive or offensive.
- Report the matter to the Clerk to decide whether the police need to be contacted or to consider how to manage contact with the person.
- Refuse to meet with someone/take a telephone call
- Block an email address
- Ask the person to leave the premises.

4.3 It may be appropriate to manage an individual's contact with the Council. This is a very serious step. Accordingly, the Policy must not be implemented by the Clerk without first consulting with the Chairman of the Council and in most cases securing a formal resolution from the F and GP Committee.

4.4.1 After proper consultation, the Clerk may be authorised by the F and GP Committee or Full Council to write to the perpetrator advising them of the way(s) in which contact with employees and/or councillors will be restricted. The perpetrator will be advised of the period the restriction(s) will be in place - which in exceptional cases may be indefinite.

4.4.2. The following are examples of possible restrictions. The list is not exhaustive:

- Restricting telephone calls to specified days/times/duration.
- Requiring any personal contact to take place in the presence of an appropriate witness.
- Requiring contact to take place with one named member of staff or councillor only.
- Requiring contact to take place in a specified process or manner, for example, only by telephone, only by email, or only by letter.
- Informing the perpetrator that the Council will not reply to or acknowledge any further contact from them on the specific topic (in this case, a designated member of staff should be identified who will read future correspondence).
- Restricting the perpetrator from making contact by telephone except through a third party, for example, a solicitor, a councillor or a friend acting on their behalf.
- Restricting the perpetrator from sending emails to an individual and/or all council officers/councillors and insisting they only correspond by letter or in an identified way.
- Restricting the perpetrator from using certain council's services, for example The Steyning Centre or Council owned open spaces such as allotments.
- Restricting the perpetrator from entering any Council building except by appointment.

4.4.3 Where restrictions are not complied with or where the behaviour may threaten the immediate safety and welfare of others the Council may report the matter to the police or take other safeguarding action including proceedings in the civil courts. In such cases the Council may not give the perpetrator warning of the action to be taken.

5. Appealing and Reviewing a Decision to Manage Contact

5.1 It is important that a person has an opportunity to appeal a decision to manage contact. Any appeal should be made in writing to the Clerk. The appeal should be made within ten working days of the decision to manage contact unless there are exceptional circumstances as to why an appeal cannot be raised within this timeframe. The procedure to be adopted thereafter will be the same as the review procedure in the STC Complaints Policy and will be undertaken by a panel of councillors.

5.2 A decision to manage contact may be reconsidered if the perpetrator demonstrates a more acceptable manner or if the circumstances that led to the original decision have changed.

Last Reviewed by Working Practices Group **4 June 2020**

Adopted by Full Council 18th May 2026

Overarching Protocol for Councillors' Personal and Official Conduct

Including Social Media, Emails and Meetings

Purpose

The Code of Conduct and its sanctions applies only when a councillor is, or appears to be, acting as such.

In contrast, this Protocol offers guidance to conduct which may not be regulated by the Code, but is distressing to staff, other councillors, or members of the public and/or the conduct risks bringing the Council or the councillor into disrepute.

Dignity at Work

The Council has an adopted Dignity at Work Policy. This applies to everyone, including staff, councillors and members of the public.

It applies to all interactions including social media, emails and meetings.

Depending on the circumstances, an alleged breach of this can be dealt with as: -

- a grievance (by a member of staff only)
- a disciplinary issue (against a member of staff only)
- a Code of Conduct issue (against a councillor acting or giving the impression of acting as such); or
- under Steyning Town Council's Unacceptable Behaviour Policy (against a member of the public).

Please refer to Steyning Town Council's Dignity at Work Policy and to Steyning Town Council's Unacceptable Behaviour Policy for details of the procedures and potential consequences.

Social Media Policy

The Council has an adopted Social Media Policy. Breach of its principles may give rise to a breach of the Dignity at Work policy and hence to a Code Complaint.

Email Policy

The Council has an adopted Email Policy. Breach of its principles may also give rise to a breach of the Dignity at Work Policy and hence to a Code Complaint.

Last Reviewed by Working Practices Group **4 June 2020**

Adopted by Full Council 18th May 2026

STEYNING TOWN COUNCIL
HEALTH AND SAFETY POLICY

1. GENERAL STATEMENT OF POLICY

1.1 Our policy is to provide and maintain safe and healthy working conditions, equipment and systems of work for all our employees, and to provide such information, instruction, training and supervision as they need for this purpose.

1.2 The allocation of duties for safety matters and the particular arrangements which we will make to implement the policy are set out below.

1.3 The policy will be kept up to date, particularly as the Council's activities change in nature and size. To ensure this, the policy, and the way in which it has operated will be reviewed every year by the Full Council.

1.4 Although risk assessment is a continuing process, it shall form part of the Council's annual review.

2. RESPONSIBILITIES

2.1 Overall and final responsibility for health and safety in the Council and for compliance with the Health and Safety at Work etc. Act and Regulations made under the Act and the Occupiers Liability Act is that of Steyning Town Council. The Clerk is responsible for this policy being carried out at all the Council's premises and the Deputy Clerk will be responsible as his/her designated duties.

2.2 The following supervisors are responsible for safety in particular areas:

Supervisor	Area	Any Special Responsibility
Deputy Clerk	Steyning Centre	
Caretaker	MPF Changing Rooms	

2.3 All employees have the responsibility to co-operate with supervisors and managers to achieve a healthy and safe workplace and to take reasonable care of themselves and others.

2.4 Whenever an employee, supervisor or manager notices a health or safety problem which they are not able to put right, they must tell the appropriate person named above.

2.5 Consultation between management and employees is provided by immediate day to day discussion with the Clerk.

2.6 The Accident Record Book is kept in the Steyning Centre Office.

3. FIRST AID

3.1 First Aid boxes are located as follows:

Box 1: The Steyning Centre Office

3.2 Appointed persons responsible for boxes are:

Box 1: The Deputy Clerk

4. FIRE SAFETY

4.1 Fire extinguishers shall be visually inspected monthly in the Steyning Centre by the Deputy Clerk. Fire extinguishers shall be maintained annually.

4.2 The fire alarm system at the Steyning Centre shall be tested monthly by the Deputy Clerk. A fire drill shall be held annually at the Steyning Centre. Annual electrical certificates shall be obtained on all Council occupied premises.

4.3 Fire exits shall be kept free from obstructions.

4.4 Notices shall be displayed giving directions for the evacuation of buildings in the event of fire.

5. TRAINING

5.1 The Town Clerk has overall responsibility for training.

6. GENERAL ADVICE

6.1 General advice to all employees is attached.

7. SPECIFIC POLICIES / RISK ASSESSMENTS

Policies for particular premises and activities are attached as Annexes as follows:-

1. Use of the Steyning Centre and Offices
2. Use of MPF and changing rooms
3. Use of the allotments
4. Use of the public toilets and bus shelter.
5. Caretaking and Cleaning – staff are provided with the following:

5.1 HSE Manual Handling at Work Guidance
5.2 HSE Working at Height Guidance
5.3 HSE Safe use of Ladders and Stepladders Guidance
5.4 HSE Preventing Slips and Trips at Work Guidance
5.5 HSE COSHH Guidance – Storing Chemical Products (small scale)
5.6 HSE COSHH Guidance - Manual Cleaning and Disinfecting Surfaces.
5.7 A Caretakers Products COSHH Guide is held in the office.

8. EMPLOYMENT OF CONTRACTORS

8.1 The notes to be given to contractors are attached.

9. REPORTING AND RECORDING ACCIDENTS

9.1 Accidents shall be reported to the Deputy Clerk who will record them in the Accidents Record Book.

10. SMOKING

10.1 Smoking is not allowed anywhere in the Steyning Centre, its offices or any other premises owned and managed by Steyning Town Council.

OFFICES

1. HEATING, LIGHTING AND VENTILATION

   a) Temperature must reach a minimum of 60.8 degrees F after the first hour of working time and be maintained between 60.8 degrees F and 68 degrees F throughout the working day.

   b) Free standing heaters must not be used unless specifically authorised. When these are so authorised, they must comply fully with Fire Regulations and the area around them must be kept clear of any paper or other flammable materials and be sited away from desks and chairs.

   c) Office lighting. Desks should be placed to gain the maximum amount of light. Free-standing desk lights should be avoided or placed so as to minimise the danger of trailing electrical leads.

2. ELECTRICAL EQUIPMENT

   a) All electrical equipment shall be inspected in accordance with the Electricity at Work Regulations 1989 (SI 1989/635).

b) Mains must not be overloaded. It is important that the correct socket outlet and plug top face (where these are available) is used for each item of electrical equipment.

c) 13 amp plugs can be used for appliances with a loading capacity maximum of 13 amps. Plus fuses must be fitted to suit current load of the equipment being used, e.g. desk lamp, calculator, typewriter: 3 amp fuse; 2-bar heater, kettle: 13 amp fuse. Fuses are available with ratings of 3, 5, 7, 10 and 13 amps. The current load is normally shown on the item of equipment. When in doubt, do not guess, seek qualified advice.

d) Only electrical equipment provided by the Council should be used and electric points must not be overloaded by means of multi-adaptors. All mains should be switched off when not in use, and plug tops removed from sockets overnight and at weekends. All equipment used in the Steyning Centre should be PAT tested.

e) Leads from points for various desk uses should not present a hazard by trailing across areas of access. Extension leads are for temporary use only and should not exceed 10 feet in length. All temporary extension leads must be secured to the floor with the appropriate hazard tape.

f) Defective equipment must never be used. Staff should not attempt to effect repairs to electrical equipment, unless competent to do so.

3. FURNITURE, FITTINGS AND EQUIPMENT

a) Heavy equipment and furniture must not be moved by individuals.

b) Office equipment whether manually or electrically operated, must not be used by unauthorised, untrained personnel.

c) Filing cabinets should always have sufficient weight in the bottom drawer to prevent the cabinet from tipping when a full top drawer is opened. Filing cabinet and desk drawers must always be closed immediately after use. Drawer filing cabinets should be inspected at least every six months to ensure correct loading and smoothness of operation, with particular regard to the effectiveness of the drawer stops. Damaged or defective cabinets must not be used.

d) High shelves should only be reached through the use of steps provided for that purpose. It is dangerous to stand on desks and chairs, particularly those fitted with castors and this should be avoided at all times.

4. FIRE PRECAUTIONS

a) All staff must be fully conversant with the "Fire Alert" system displayed in the offices.

b) Emergency exits, corridors, landings and staircases must be kept clear at all times.

c) Flammable materials must not be stored, even for a temporary period, in the offices or corridors, unless the storage is in a fire-resistant structure such as a metal cupboard or bin, clearly marked "Flammable Materials".

d) Wastepaper bins must be of Fire-resistant construction and be emptied each day.

e) In the case of a fire emergency and the evacuation of the building, the meeting point will be the Fletchers Croft car park.

GROUNDS MAINTENANCE

1. Only contractors or authorised members of staff, who have received training and instruction in the operation of machinery and equipment may do so.

2. All dangerous moving parts of machinery must be guarded. Guards must not be removed except for the purpose of repair and maintenance. All machinery must comply with statutory regulations for guarding and use.

3. The engines of any motorised equipment must be stopped before any inspection or adjustment is carried out. In the case of electrically operated machines the plug lead must be disconnected.

4. Children must not be allowed to play in an area where machinery is in use. Machinery must not be left unattended where children (or others) may interfere with them.

5. Stones and similar objects must be cleared from the path of equipment to prevent such objects being projected from machinery.

6. Fuel tanks must only be filled in the open, with the engine stopped. No risk of naked flames, or smoking is allowed in the vicinity of a fuel tank or storage can. Fuel may only be stored in a safety can of a type approved, and in a store designated by the Fire Officer.

7. The manufacturer’s instructions regarding the safe use of chemicals must be adhered to.

8. Appropriate protective clothing such as gloves and overalls, face masks and boots must be used when operating with machinery and chemicals including herbicides and pesticides.

9. Ladders and stepladders must be in good condition and free from defects and securely positioned at all times when in use.

ROOM HIRERS

All persons hiring rooms must be given a copy of the Health & Safety Policy and must sign a copy to confirm that they understand and will comply with the policy. The signed copy will be retained by the Clerk

It is the responsibility of hiring the room to ensure that they acquaint all the users of the room with the exits and meeting point in case of an emergency.
It is the responsibility of the person hiring the room to ensure that all users have exited the room safely during an emergency and are accounted for.

Agreed and adopted by Steyning Town Council 18th May 2026

Staff Grievance Policy

1. PURPOSE AND SCOPE

It is the policy of the council to give employees the opportunity to air and seek redress for any individual employment grievance which they may have. Grievances may be any concerns, problems or complaints employees wish to raise with the council. This document describes the procedure which aims to facilitate a speedy, fair and consistent solution to an individual employee's employment grievance. This procedure is produced in line with the ACAS Code of Practice 2009 as set out in the Employment Act 2008.

2. PRINCIPLES

a) At every stage in the procedure the employee will be given the opportunity to state his or her case before any decision is made.

b) Grievances will be dealt with promptly and consistently

c) At all formal stages the employee will have the right to be accompanied by a work colleague or trade union representative during the Grievance Hearing.

d) An employee will have the right to appeal against any outcome of a Grievance Hearing.

e) At no time will an employee be penalised or victimised for having raised a Grievance against the council

3. PROCEDURE

3.1 Wherever possible, any grievance should be raised informally with the employee's line manager, or if this is inappropriate with the Chairman. In the case of the Clerk to the council raising a grievance this should be directed to the Chair of the council unless the complaint is about the Chair in which case another Member can be identified to handle the Clerk's concerns. The recipient of the grievance from a clerk should share the grievance with the relevant committee established to handle employment matters and the issues should be treated with discretion and confidentiality at all times.

3.2 **Written Statement**: If the employee does not consider it appropriate to raise the grievance informally, or if requested by the person the employee spoke to informally, then the employee should submit a formal grievance in writing to their line manager, or if this is inappropriate to the next level of management.

3.3 **Meeting or Hearing**: Generally, within a reasonable period of time e.g. five working days of receipt of a written complaint, the line manager or Chair of the appropriately convened committee or hearing panel will arrange a meeting with the employee. The Hearing Manager will endeavour to make the meeting arrangements mutually convenient and will arrange a confidential location, free from interruptions. The manager will investigate the substance of the complaint and hear submissions from the employee concerned together with such other submissions or evidence as he/she shall consider appropriate and take such steps as s/he shall consider necessary to resolve the issue raised. It may be necessary to adjourn the meeting in order for an investigation to take place. Careful consideration of the evidence and the necessary steps required to resolve the problems will be given to the grievance. The employee may call witnesses by prior arrangement with the panel. There is no right for a Member or employee implicated in an employee's grievance to cross examine the aggrieved during a grievance hearing but the panel may wish to make its own investigations through interviewing these individuals and/or other witnesses separately. The Panel may ask the employee what he or she would like to happen as a result of raising the grievance and bear this in mind when preparing the response.

3.4 Response: The Hearing Manager will advise the decision to the employee in writing and, where appropriate, include an action plan to assist in the resolution of the problem. Councils which handle internal disputes effectively generally consider the options and costs in a timely fashion, then agree and publicise the workable solutions, monitor, review and learn from the experience. There may be some value in exploring Mediation as a way in which to resolve differences between two parties. The SLCC can advise on approaches and bodies which may be able to assist (nb external organisations may levy a fee for such services)

3.5 Appeal: If the employee is dissatisfied with the decision of the line manager on his/her complaint, he/she may appeal against the decision to the Chair/Mayor or other elected Member by written notice within five working days of the decision. An Appeal may be raised if:

- The employee thinks the finding, or action plan, is unfair
- New evidence has come to light
- The employee thinks that the procedure was not applied properly

On receipt of the appeal the council's Appeals Panel shall arrange to meet and consult with the employee, the line manager or Members concerned and any other persons, as s/he shall consider appropriate without unreasonable delay. The Appeal Hearing Chair shall consider the issues and shall then take all such steps, as s/he may consider necessary to resolve those issues. Where the council's Chair or Mayor has chaired the initial grievance meeting the Vice Chair or Chair of another committee will hear the appeal as a hearing manager the decision of the Appeal Hearing will be final. The council will need to ensure that the Members involved in the hearings are able to act impartially and reasonably at all times. The outcome of the appeal should be conveyed to the employee in writing in a timely manner.

3.6 **Bullying or Harassment**: If a grievance concerns alleged bullying or harassment the matter should be reported promptly to the employee's Line Manager, or another manager/Member if more appropriate, with an indication of the required action. The complaint will then be investigated and any action taken and any resolution achieved will be reported back. If the solution is not satisfactory to the complainant, the matter will be discussed further and, if appropriate, an alternative solution agreed. The decision at this stage will generally conclude the enquiry. If a further appeal or review is available the employee will be notified. As a result of an investigation into a claim of harassment disciplinary action may be instigated against any alleged perpetrators of the action or in the case of alleged perpetrators being elected Members a Code of Conduct complaint lodged by the council through the Standards process/Ombudsman in Wales

Refer to the Dignity at Work/Bullying and Harassment Policy for further details

3.7 **Right to be Accompanied:** At any formal stage of the procedure an employee may be accompanied by a fellow employee of their choice or their trade union representative or official of a trade union (appropriately accredited) but as this is an internal procedure, they will not be entitled to be accompanied by any external supporter e.g. partner, parent, solicitor etc. This right to be accompanied is enshrined in the Employment Relations Act 1999. To exercise this right the employee should make a reasonable request. The companion will be allowed to address the hearing, put and sum up the employee's case, respond to views expressed at the hearing and to confer with the employee during the hearing (sometimes in an adjournment) but is not allowed to answer questions on the employee's behalf, address the hearing if the employee does not wish it or prevent the employer from explaining their case.

3.8 **Hearing Panels**

The SLCC advise that councils establish hearing panels to hear disciplinary and grievance hearings on an annual basis so that if a dispute does arise in the workplace the elected members involved are already trained and briefed on their duties as a hearing or appeal panel member. In situations where individual members are implicated in the dispute or have undertaken an investigatory role then they will need to be substituted as panel members.

3.9 **Confidentiality:** So far as is reasonably practicable, the council will keep any grievance or complaint of harassment confidential between the manager or Member investigating the grievance or complaint, the employee and the person about whom the grievance or complaint is made. If it is necessary to investigate the matter with any other employee or person, the employee will be so advised.

3.9 **Record Keeping**: In all cases, written records of the nature of the grievance raised, the employer's response, action taken (with reasons), details of any appeal and subsequent developments will be retained and kept in accordance with the Data Protection Act 1998.

3.10 Grievances raised during Disciplinaries

In some circumstances when a disciplinary process has commenced an employee chooses to exercise his/her right to raise an internal grievance about the employment relationship with the council or individual Members. The SLCC recommends, in line with ACAS advice, that disciplinary matters are placed on hold until grievances have been aired and actions towards a resolution have been progressed. In exceptional circumstances it is pragmatic to deal with the two disputes concurrently but SLCC would advise caution and specialist advice should be sought if this arises.

4. GETTING IT WRONG

Following the repeal of the 2004 Dispute Resolution regulations employees no longer HAVE to raise a grievance before going to an employment tribunal. However, establishing a mechanism for differences and disputes to be resolved internally can often allow the employment relationship to continue. Failure to follow the ACAS Code of Practice (available at www.acas.org.uk) when dealing with grievances can lead to an Employment Tribunal awarding an uplift of an award against the council of up to 25%. Tribunals dealing with constructive dismissal and discrimination claims are particularly interested in whether the employer followed a procedure when dealing with an internal dispute and whether the employer acted fairly and reasonably. One way in which to avoid such a penalty is to have an agreed procedure, communicate that procedure to staff and Members, revisit and review the procedure regularly and have some training for those who are expected to operate the procedure.

Adopted by Full Council on 18th May 2026

Steyning Town Council

Staff Discipline Policy

PURPOSE AND SCOPE

This procedure is designed to help and encourage all council employees to achieve and maintain high standards of conduct whilst at work or representing the council. The aim is to ensure consistent and fair treatment for all. This procedure is prepared in accordance with the dismissal and dispute resolution procedures as set out in the Employment Act 2008 and the ACAS Code of Practice APR 2009

PRINCIPLES

a) No disciplinary action will be taken against an employee until the case has been fully investigated
b) At every stage in the procedure the employee will be advised of the nature of the complaint against him or her and will be given the opportunity to state his or her case before any decision is made.
c) At all formal stages the employee will have the right to be accompanied by a trade union representative or work colleague during the disciplinary interview.
d) No employee will be dismissed for a first breach of discipline except in the case of gross misconduct when the penalty of dismissal without notice or payment in lieu of notice may be applied.
e) An employee will have the right to appeal against any disciplinary penalty imposed.
f) The procedure may be implemented at any stage if the employee's alleged misconduct warrants such action.

THE PROCEDURE FOR MISCONDUCT and GROSS MISCONDUCT

3.1.1 The following list provides examples of **misconduct** which will normally give rise to formal disciplinary action:

- Unauthorised absence from work
- Persistent short-term and/or frequent absences from work without a medical reason
- Lateness for work or poor time keeping
- Inappropriate standard of dress
- Minor breaches of Health and Safety or other Society rules or procedures
- Failure to perform your job to the standard expected or in line with your job description/objectives
- Time wasting

- Disruptive behaviour
- Misuse of the council's facilities (e.g. telephones, computers, email or the internet)
- Refusal to carry out reasonable requests or instructions
- Smoking in unauthorised areas
- Failure to follow an agreed council Procedure

This list is not exhaustive and offences of a similar nature will result in disciplinary action being instigated N.B. persistent or frequent absence on medical grounds and long term sickness absence will be dealt with using a procedure for Incapacity, which is described in the Absence Policy.

3.1.2 The following list provides examples of offences which are normally regarded as **gross misconduct:**

- Theft, fraud, deliberate falsification of records, or other acts of dishonesty
- Fighting, assault on another person
- Deliberate damage to property of the council, its workers or members
- Gross incompetence in the conduct of work
- Gross negligence which results in the council or employees being put at risk.
- Being under the influence of illegal drugs or excessive alcohol
- Acts of incitement towards or actual acts of discrimination, harassment or victimisation including on the grounds of sex, race, colour, ethnic origin, disability, sexual orientation, age, religion or belief
- Serious acts of insubordination
- Serious breach of duty to keep information of the council, its service providers and its clients confidential
- Unauthorised entry to computer records
- Serious breach of the council's Security Policy, Health & Safety Policy, Confidentiality or e-mail and Internet Policy
- Any action, whether committed on or off the premises, that is likely to or does bring the council into disrepute
- Serious negligence which causes or might causes significant loss, damage or injury
- Accepting bribes or incentive payments from suppliers
- Unauthorised use of Society funds or credit
- Working with an external agency to provide information which would be detrimental to and cause commercial risk to the council.

This list is not exhaustive and other offences of a similar gravity will result in disciplinary action being instigated at Gross Misconduct level which carries a potential penalty of dismissal. Gross Misconduct is generally any conduct which places extreme pressure on the mutual trust which exists in an employment relationship.

3.2 INFORMAL ACTION
Minor misconduct will be dealt with informally usually in a confidential one-to-one meeting between the employee and line manager. In the case of the Clerk being the individual against whom there is a complaint or allegation the matter should be handled discreetly by members of the Staffing (or similar) committee and involve an informal meeting initially.

However, where the matter is more serious or informal action has not brought about the necessary improvement the following procedure will be used:

3.3 FORMAL ACTION

3.3.1 The level of warning you may receive for misconduct/gross misconduct will depend on how serious the council considers the alleged actions to be and your previous conduct in all the circumstances**.** In the event of alleged gross misconduct the formal process may commence at Stage 4 –see 3.4 below**.**

3.3.2 Disciplinary Letters

If there is a concern about an employee's conduct or behaviour then a letter will be given to the employee advising him/her of the allegation(s) and reasons why this is unacceptable. The letter should invite the employee to attend a meeting at which the alleged misconduct will be discussed and will inform the employee of their right to be accompanied to the meeting. The letter will specify at which stage the disciplinary procedure is being invoked (see 4 stages below) and if invoked at Stage 4 for Gross Misconduct the letter will warn that a potential outcome could be dismissal. The time, date and venue of the meeting will also be advised. Any documents to be produced at the meeting will also be provided.

3.3.3 Disciplinary Meetings

The time and location of a disciplinary meeting should be agreed with the employee and it should be held in a private location with no interruptions. This will normally be without undue delay but allowing the employee to prepare their case e.g. within 5 days of the letter being sent, where practically possible. At the meeting the manager (or in the case of the Clerk being disciplined, the Chair of the hearing panel) will state the complaint against the employee and go through the evidence which has been gathered. The employee will also be allowed to ask questions, present evidence and call witnesses if advance notice has been given that they will do so.

If the employee is unable to attend the meeting due to unforeseeable reasons out of their control (e.g. illness) then the council will reasonably rearrange the meeting. However, if the employee fails to attend the meeting without good reason the meeting can be held in the employee's absence.

3.4 OUTCOMES AND PENALTIES

Stage 1 - Oral Warning

In the instance of a first complaint that conduct does not meet acceptable standards, the employee will normally be given a formal ORAL WARNING. He or she will be advised of;

- the reason for the warning,
- that it is the first stage of the disciplinary procedure,
- the improvement that is required and the timescales for achieving this improvement,
- together with a review date and any support available (where applicable) and
- his or her right of appeal.

A brief note of the oral warning will be kept but it will be spent after 6 months, subject to satisfactory conduct.

Stage 2 - Written Warning

If the offence is a serious one, or if further to previous formal disciplinary action, a WRITTEN WARNING will be given to the employee by the Line Manager. This will give details of the complaint, the improvement required and the timescale. It will warn that action under Stage 3 will be considered if there is no satisfactory improvement and will advise of the right of appeal. A copy of this written warning will be kept on file but it will be disregarded for disciplinary purposes after 12 months subject to satisfactory conduct..

Stage 3 – Final Written Warning

If there is still a failure to improve and conduct or performance is still unsatisfactory, or the misconduct is sufficiently serious, a FINAL WRITTEN WARNING will normally be given to the employee. This will give details of the complaint, will warn that dismissal will result if there is no satisfactory improvement and will advise of the right of appeal. A copy of this final written warning will be kept by the Line Manager (or in the case of the Clerk being disciplined by the Chair of the Hearing Panel) but it will be spent after 12 months (in exceptional cases the period may be longer) subject to satisfactory conduct.

Stage 4 – Dismissal or other sanctions

If conduct is still unsatisfactory and the employee still fails to reach the prescribed standards, or where the Society reasonably believes Gross Misconduct has occurred, DISMISSAL may result. Only the appropriately convened hearing panel can take the decision to dismiss an employee. The employee will be given a written statement of allegations against him/her, invited to a meeting and then be notified in writing of the reasons for the decision taken at the hearing. Penalties at this stage may include dismissal with notice or summary dismissal (i.e. without any notice), Final Written Warning with/without demotion, loss of pay or loss of seniority. If dismissal is the outcome, the employee will be advised of the date on which employment will terminate. In all cases the employee has a right of appeal.

Very exceptionally, if an offence of Gross Misconduct is extremely serious an employee can be dismissed immediately without a meeting. In this situation a letter setting out reasons for dismissal would be sent to the employee offering the opportunity for an appeal hearing.

3.5 SUSPENSION

If you are accused of an act of gross misconduct, you may be suspended from work on full pay while the council investigates the alleged offence. Only the appropriately convened committee has the power to suspend. This enables a swift and thorough investigation to occur. Whilst suspended pending disciplinary investigation regular contact with a nominated person at the council will be maintained although access to premises, equipment or systems may be denied. The Investigator who compiles evidence for the disciplinary hearing must play no part in the subsequent decision-making to ensure impartiality. Councils need to consider the implications of such arrangements on its hearing and appeal panel plans early on in the disciplinary process.

3.6 APPEALS

The Appeals stage of the disciplinary process is part of the Code of Practice to which an employee has a right. It can be exercised after any of the stages of disciplinary action for Misconduct/Poor Performance or Gross Misconduct.

An employee who wishes to appeal against a disciplinary decision should inform the Chair/Mayor (or Chair of the relevant committee) within five working days, in writing and giving reasons for the appeal. An Appeal may be raised if:

- The employee thinks the finding or penalty is unfair
- New evidence has come to light
- The employee thinks that the procedure was not applied properly

.
Where possible the Appeal will be heard by a separate panel of elected members who have not been involved in the original disciplinary hearing, who will view the evidence with impartiality. The employee will have the right to be accompanied by a colleague or accredited Trade Union official or lay member at the appeal hearing. The outcome of the appeal and reasons for it will be advised to the employee as soon as possible after the meeting and be confirmed in writing.   At the Appeal hearing any disciplinary penalty imposed will be reviewed but it cannot be increased. The decision taken at the Appeal hearing will be final.

3.7 THE RIGHT TO BE ACCOMPANIED

At each formal stage of disciplinary interview an employee has the right to be accompanied and can make a reasonable request for such a person to accompany them. An employee can ask any other employee or a trade union representative or an appropriately accredited official employed by a trade union to accompany them, to give support and help them prepare for the disciplinary interview. This right is enshrined in the 1999 Employment Relations Act. As this is an internal process there is no provision to have any external person accompany or represent an employee e.g. partner, parent, solicitor etc. the companion can address the hearing, put and sum up the employee’s case, respond on behalf of the worker to any views expressed at the meeting, confer with the employee. The companion cannot however answer questions on the employee’s behalf or address the hearing if the employee does not wish him/her to or prevent the employee explaining their case.

3.8 HEARING PANELS

The SLCC advise that councils establish hearing panels to hear disciplinary and grievance hearings on an annual basis so that if a dispute does arise in the workplace the elected members involved are already trained and briefed on their duties as a hearing or appeal panel member. In situations where individual members are implicated in the dispute or have undertaken an investigatory role then they will need to be substituted as panel members.

3.9 NOTE-TAKING

It is highly recommended that a note-taker be provided to every meeting/hearing which arises as a result of a disciplinary process as Employment Tribunals are particularly keen to view contemporaneous notes of events which have led to an employment dispute. Councils will need to give this requirement careful consideration in order to respect employee confidentiality.

3.10 GRIEVANCES RAISED DURING DISCIPLINARIES

In some circumstances when a disciplinary process has commenced an employe chooses to exercise his/her right to raise an internal grievance about the employment relationship with the council or individual Members. The SLCC recommends, in line with ACAS advice, that disciplinary matters are placed on hold until grievances have been aired and actions towards a resolution have been progressed. In exceptional circumstances it is pragmatic to deal with the two disputes concurrently but SLCC would advise caution and specialist advice should be sought if this arises.

3.11 CRIMINAL CHARGES OR CONVICTIONS

If an employee is charged with or convicted of a criminal offence this does not automatically give rise to a disciplinary situation. Consideration needs to be given to how a charge or conviction may affect an employee's ability to undertake his or her job duties and their relationships with the employer, colleagues, subordinates or customers.

4. GETTING IT WRONG

Failure to follow the ACAS Code of Practice (available at www.acas.org.uk) can lead to an Employment Tribunal awarding an uplift of an award against the council of up to 25%. Tribunals dealing with unfair dismissal claims are particularly interested in whether the employer followed a procedure and whether the employer acted fairly and reasonably. One way in which to avoid such a penalty is to have an agreed procedure, communicate that procedure to staff and Members, revisit and review the procedure regularly and have some training for those who are expected to operate the procedure.

Adopted by Full Council 18th May 2026

EQUALITY POLICY

LEGAL POSITION

It is unlawful to discriminate against an individual on the following grounds:

- **age**
- **disability**
- **gender reassignment**
- **marriage and civil partnership**
- **pregnancy and maternity**
- **race**
- **religion or belief**
- **sex**
- **sexual orientation**

Under the Equality Act 2010 these are known as ‘protected characteristics’

PURPOSE

The purpose of this policy is to provide equal opportunities to all employees, irrespective of their characteristics (unless there are genuine occupational qualifications or objectively justified reasons for a different approach to be taken). We oppose all forms of unlawful and unfair discrimination whether it be direct or indirect discrimination, victimization or harassment on the grounds of any of the protected characteristics defined in the Equality Act 2010.

SCOPE

All employees whether full-time, part-time, fixed term contract, agency workers or temporary staff, will be treated fairly and equally. Selection for employment, promotion, training, remuneration or any other benefit will be on the basis of aptitude and ability. All employees will be helped and encouraged to develop their full potential and the talents and resources of the workforce will be fully utilised to maximise the efficiency of the council.

OUR COMMITMENT

Every employee is entitled to a working environment that promotes dignity and respect to all. No form of intimidation, bullying or harassment will be tolerated. This is further defined in the Dignity at Work policy adopted by the council.

The commitment to equal opportunities in the workplace is good management practice and makes sound business sense as it seeks to utilise the talents available from the local community, representing Society as a whole.

Breaches of our equal opportunities policy will be regarded as serious misconduct and could lead to disciplinary proceedings. Employees are entitled to complain about discrimination or harassment or victimization through the council's Grievance procedure.

This policy is fully supported by all Members of the council and adopts the model contract as devised by the employee professional body in the local government sector (the Society of Local Council Clerks).

The policy will be monitored and reviewed bi-annually. Other Personnel policies will be reviewed against the values stated in this policy to ensure that the council strives to remain an Equal Opportunities employer.

Uses of Policy – Staff Handbook (when drafted), Induction of staff and Members, decisions relating to Recruitment and Selection, Training and Development, Promotion, Remuneration, Retirement, cross-referenced to Grievance, disciplinary and Dignity at Work Policies.

Adopted by Full Council 18th May 2026

Steyning Town Council

COUNCILLOR-OFFICER PROTOCOL

Agreed at Full Council on 18th May 2026

INTRODUCTION

The purpose of this Protocol is to guide councillors and officers of the council in their relations with one another. The Protocol's intention is to build and maintain good working relationships between councillors and officers as they work together. Employees who are required to give advice to councillors are referred to as "officers" throughout.

A strong, constructive, and trusting relationship between councillors and officers is essential to the effective and efficient working of the council.

This Protocol also seeks to reflect the principles underlying the Code of Conduct which applies to councillors and the employment terms and conditions of officers. The shared objective is to enhance and maintain the integrity (real and perceived) of local government.

The following extract from the Local Government Association guidance on the 2020 Model councillor Code of Conduct states that:

> *"Both councillors and officers are servants of the public and are indispensable to one another. Together, they bring the critical skills, experience and knowledge required to manage an effective local authority.*
>
> *At the heart of this relationship, is the importance of mutual respect. councillor-officer relationships should be conducted in a positive and constructive way. Therefore, it is important that any dealings between councillors and officers should observe reasonable standards of courtesy, should show mutual appreciation of the importance of their respective roles and that neither party should seek to take unfair advantage of their position or seek to exert undue influence on the other party.*

councillors provide a democratic mandate to the local authority and are responsible to the electorate whom they represent. They set their local authority's policy framework, ensure that services and policies are delivered and scrutinise local authority services.

[Councillors of the executive,] Chairs and vice chairs of committees have additional responsibilities. These responsibilities will result in increased expectations and relationships with officers that are more complex. Such councillors must still respect the impartiality of officers and must not ask them to undertake work of a party-political nature or compromise their position with other councillors or other officers.

Officers provide the professional advice and managerial expertise and information needed for decision making by councillors and to deliver the policy framework agreed by councillors. They are responsible for implementing decisions of councillors and the day-to-day administration of the local authority.

The roles are very different but need to work in a complementary way.

It is important for both sides to respect these differences and ensure that they work in harmony. Getting that relationship right is an important skill. That is why the code requires councillors to respect an officer's impartiality and professional expertise. In turn officers should respect a councillor's democratic mandate as the people accountable to the public for the work of the local authority. It is also important for a local authority to have a councillor-officer protocol which sets out how this relationship works and what both councillors and officers can expect in terms of mutual respect and good working relationships."

This Protocol covers:

- The respective roles and responsibilities of the councillors and the officer;
- Relationships between councillors and officers;
- Where/who a councillor or an officer should go to if they have concerns;
- Who is responsible for making decisions.

BACKGROUND

This Protocol is intended to assist councillors and officers, in approaching some of the sensitive circumstances which arise in a challenging working environment.

The reputation and integrity of the council is significantly influenced by the effectiveness of councillors and the officer working together to support each other's roles.

The aim is effective and professional working relationships characterised by mutual trust, respect and courtesy. Overly close personal familiarity between councillors and officers is not recommended as it has the potential to damage this relationship

ROLES OF COUNCILLORS AND OFFICERS

The respective roles of councillors and officers can be summarised as follows:

- Councillors and officers are servants of the public and they are indispensable to one another, but their responsibilities are distinct.
- Councillors are responsible to the electorate and serve only for their term of office.
- Officers are responsible to the council. Their job is to give advice to councillors and to the council, and to carry out the council's work under the direction and control of the council and relevant committees.

Councillors

Councillors have four main areas of responsibility:

- To determine council policy and provide community leadership;
- To monitor and review council performance in implementing policies and delivering services;
- To represent the council externally; and
- To act as advocates for their constituents.

All councillors have the same rights and obligations in their relationship with the officer, regardless of their status and should be treated equally.
Councillors should not involve themselves in the day to day running of the council. This is the officer's responsibility, and the officer will be acting on instructions from the council or its committees, within an agreed job description.

In line with the councillors' Code of Conduct, a councillor must treat others with respect, must not bully or harass people and must not do anything which compromises, or is likely to compromise, the impartiality of those who work for, or on behalf of, the council.

Officers can expect councillors:

- to give strategic leadership and direction and to seek to further their agreed policies and objectives with the understanding that councillors have the right to take the final decision on issues based on advice
- to act within the policies, practices, processes and conventions established by the council
- to work constructively in partnership with officers acknowledging their separate and distinct roles and responsibilities
- to understand and support the respective roles and responsibilities of officers and their associated workloads, pressures and reporting lines
- to treat them fairly and with respect, dignity and courtesy
- to act with integrity, to give support and to respect appropriate confidentiality
- to recognise that officers do not work under the instruction of individual councillors or groups
- not to subject them to bullying, intimidation, harassment, or put them under undue pressure.
- to treat all officers, partners (those external people with whom the council works) and members of the public equally, and not discriminate based on any characteristic such as age, disability, gender reassignment, marriage or civil partnership, pregnancy and maternity, race, religion or belief, sex, sexual orientation.
- not to request officers to exercise discretion which involves acting outside the council's policies and procedures

- not to authorise, initiate, or certify any financial transactions or to enter into any contract, agreement or undertaking on behalf of the council or in their role as a councillor without proper and lawful authority
- not to use their position or relationship with officers to advance their personal interest or those of others or to influence decisions improperly
- to comply at all times with the councillors' Code of Conduct, the law, and such other policies, procedures, protocols and conventions agreed by the council.
- respect the impartiality of officers and do not undermine their role in carrying out their duties
- do not ask officers to undertake work, or act in a way, which seeks to support or benefit a particular political party or gives rise to an officer being criticised for operating in a party-political manner
- do not ask officers to exceed their authority where that authority is given

Chairs and vice-chairs of council and committees

Chairs and vice-chairs have additional responsibilities as delegated by the council. These responsibilities mean that they may have to have a closer working relationship with employees than other councillors do. However, they must still respect the impartiality of officers and must not ask them to undertake work or anything else which would prejudice their impartiality.

Officers

The primary role of officers is to advise, inform and support all members and to implement the agreed policies of the council.

Officers are responsible for day-to-day managerial and operational decisions within the council, including directing and overseeing the work of any more junior officers. councillors should avoid inappropriate involvement in such matters.

In performing their role officers will act professionally, impartially and with neutrality. Whilst officers will respect a councillor's view on an issue, the officer should not be influenced or pressured to make comments, or recommendations which are contrary to their professional judgement or views.

Officers must:

- implement decisions of the council and its committees which are lawful, which have been properly approved in accordance with the requirements of the law and are duly recorded. This includes respecting the decisions made, regardless of any different advice given to the council or whether the decision differs from the officer's view.
- work in partnership with councillors in an impartial and professional manner
- treat councillors fairly and with respect, dignity and courtesy
- treat all councillors, partners and members of the public equally, and not discriminate based on any characteristic such as age, disability, gender reassignment, marriage or civil partnership, pregnancy and maternity, race, religion or belief, sex, sexual orientation.
- assist and advise all parts of the council. Officers must always act to the best of their abilities in the best interests of the authority as expressed in the council's formal decisions.
- respond to enquiries and complaints in accordance with the council's standards protocol
- be alert to issues which are, or are likely to be, contentious or politically sensitive, and be aware of the implications for councillors, the media or other sections of the public.

- act with honesty, respect, dignity and courtesy at all times
- provide support and learning and development opportunities for councillors to help them in performing their various roles in line with the council's training and development policy
- not seek to use their relationship with councillors to advance their personal interests or to influence decisions improperly
- to act within the policies, practices, processes and conventions established by the council

Officers have the right not to support councillors in any role other than that of councillor, and not to engage in actions incompatible with this Protocol.

In giving advice to councillors, and in preparing and presenting reports, it is the responsibility of the officer to express his/her own professional views and recommendations. An officer may report the views of individual councillors on an issue, but the recommendation should be the officer's own. If a councillor wishes to express a contrary view they should not pressurise the officer to make a recommendation contrary to the officer's professional view, nor victimise an officer for discharging his/her responsibilities.

There are exceptional circumstances where a councillor can fulfil the role of officer, for example where there is a vacancy. This can only be done if the councillor is not paid for the role and should only ever be short-term while the council seeks to fill a vacancy. There will need to be a particular clear understanding of when the councillor is acting as a councillor and when acting as the Proper Officer.

The Relationship: General

Councillors and officers are indispensable to one another. However, their responsibilities are distinct. councillors are accountable to the public, whereas officers are accountable to the council as a whole.

At the heart of this Protocol is the importance of mutual respect and also of civility. councillor/officer relationships are to be conducted in a positive and constructive way. Therefore, it is important that any dealings between councillors and officers should observe standards of courtesy and that neither party should seek to take unfair advantage of their position nor seek to exert undue influence on the other party.

Individual councillors should not actively seek to undermine majority decisions of the corporate body, as this could then bring them into conflict with officers who have been charged with promoting and implementing the council's collectively-determined course of action.

Councillors should not raise matters relating to the conduct or capability of an officer, or of officers collectively, in a manner that is incompatible with this Protocol at meetings held in public or on social media. This is a long-standing tradition in public service. An officer has no means of responding to criticisms like this in public.

A councillor who is unhappy about the actions taken by, or conduct of, an officer should:

- avoid personal attacks on, or abuse of, the officer at all times
- ensure that any criticism is well founded and constructive
- ensure that any criticism is made in private
- take up the concern with the chair

Neither should an officer raise with a councillor matters relating to the conduct or capability of another councillor or officer or to the internal management of the council in a manner that is incompatible with the objectives of this Protocol.

Potential breaches of this Protocol are considered below.

Expectations

All councillors can expect:

- A commitment from officers to the council as a whole, and not to any individual councillor, group of councillors or political group;
- A working partnership;
- Officers to understand and support respective roles, workloads and pressures;
- A timely response from officers to enquiries and complaints;
- Officer’s professional and impartial advice, not influenced by political views or personal preferences;
- Timely, up to date, information on matters that can reasonably be considered appropriate and relevant to their needs, having regard to any individual responsibilities or positions that they hold;
- Officers to be aware of and sensitive to the public and political environment locally;
- Respect, courtesy, integrity and appropriate confidentiality from officers and other councillors;
- Training and development opportunities to help them carry out their role effectively;
- Not to have personal issues raised with them by officers outside the council’s agreed procedures;
- That officers will not use their contact with councillors to advance their personal interests or to influence decisions improperly.

Officers can expect from councillors:

- A working partnership;
- An understanding of, and support for, respective roles, workloads and pressures;
- Leadership and direction;
- Respect, courtesy, integrity and appropriate confidentiality;
- Not to be bullied or to be put under undue pressure;
- That councillors will not use their position or relationship with officers to advance their personal interests or those of others or to influence decisions improperly;
- That councillors will at all times comply with the council’s adopted Code of Conduct.

Some general principles

Close personal relationships between councillors and officers can confuse their separate roles and get in the way of the proper conduct of council business, not least by creating a perception in others that a particular councillor or officer is getting preferential treatment.

Special relationships with particular individuals are not recommended as it can create suspicion that an employee favours that councillor above others.

The Proper Officer (usually called the Clerk) is the head of paid services and has a line-management responsibility to all other staff. Communications should be made directly with the Proper Officer, unless it is agreed by the Proper Officer that such communications may take place directly with other officers over a particular matter. Councillors should not give instructions directly to the Proper Officer's staff without the express approval of the Proper Officer.

COUNCILLORS' ACCESS TO INFORMATION AND TO COUNCIL DOCUMENTS

Councillors are free to approach officers to provide them with such information, explanation and advice as they may reasonably need in order to assist them in discharging their role as members of the council. This can range from a request for general information about some aspect of the council's activities to a request for specific information on behalf of a constituent. Such approaches should normally be directed to the Officer.

The legal rights of councillors to inspect council documents are covered partly by statute and partly by the common law.

The common law right of councillors is based on the principle that any member has a prima facie right to inspect council documents so far as their access to the documents is reasonably necessary to enable the member properly to perform their duties as a member of the council. This principle is commonly referred to as the "need to know" principle.

The exercise of this common law right depends therefore upon the councillor's ability to demonstrate that they have the necessary "need to know". In this respect a member has no right to "a roving commission" to go and examine documents of the council. Mere curiosity is not sufficient. The crucial question is the determination of the "need to know". This question must be determined by the officer.

In some circumstances (e.g. a committee member wishing to inspect documents relating to the functions of that committee) a councillor's "need to know" will normally be presumed. In other circumstances (e.g. a councillor wishing to inspect documents which contain personal information about third parties) a councillor will normally be expected to justify the request in specific terms. Any council information provided to a councillor must only be used by the councillor for the purpose for which it was provided i.e. in connection with the proper performance of the councillor's duties as a member of the council.

For completeness, councillors do, of course, have the same right as any other member of the public to make requests for information under the Freedom of Information Act 2000.

CORRESPONDENCE

Correspondence between an individual councillor and an officer should not normally be copied (by the officer) to any other councillor. Where exceptionally it is necessary to copy the correspondence to another councillor, this should be made clear to the original councillor. In other words, a system of "silent copies" should not be employed. Acknowledging that the "BCC" system of e-mailing is used, it should be made clear at the foot of any e-mails if another councillor has received an e-mail by adding "CC councillor X."

Official letters or emails on behalf of the council should normally be sent out under the name of the officer, rather than under the name of a councillor. It may be appropriate in certain circumstances (e.g. representations to a Government Minister) for a letter or email to appear over the name of the chair, but this should be the exception rather than the norm. Letters or emails which, for example, create obligations or give instructions on behalf of the council should never be sent out in the name of a councillor.

Correspondence to individual councillors from officers should not be sent or copied to complainants or other third parties if they are marked “confidential”. In doing so, the relevant officer should seek to make clear what is to be treated as being shared with the councillor in confidence only and why that is so.

PRESS AND MEDIA

Councils are accountable to their electorate. Accountability requires local understanding. This will be promoted by the council, explaining its objectives and policies to the electors and customers. Councils use publicity to keep the public informed and to encourage public participation. The council needs to tell the public about the services it provides. Good effective publicity should aim to improve public awareness of the council’s activities. Publicity is a sensitive matter in any political environment because of the impact it can have. Expenditure on publicity can be significant. It is essential to ensure that decisions on publicity are properly made in accordance with the Code of Recommended Practice on Local Authority Publicity and the council’s Media Protocol.

The officer may respond to press enquiries but should confine any comments to the facts of the subject matter and the professional aspects of the function concerned. On no account must an officer expressly or impliedly make any political opinion, comment or statement.

Any press release that may be necessary to clarify the council’s position in relation to disputes, major planning developments, court issues or individuals’ complaints should be approved by the officer.

The chair (or chair of a committee) may act as spokespersons for the council in responding to the press and media and making public statements on behalf of the council but should liaise with the officer on all forms of contact with the press and media. The council may also appoint individual councillors as spokespeople where there is an area of particular expertise but this should only be done with the agreement of the council.

The council must comply with the provisions of the Local Government Act 1986 (“the Act”) regarding publicity. All media relations work will comply with the national Code of Practice for Local Government Publicity. The Code is statutory guidance and the council must have regard to it and follow its provisions when making any decision on publicity.

The LGA has produced useful guidance on the Publicity Code - https://www.local.gov.uk/publications/short-guide-publicity-during-pre-election-period

For more detailed information and guidance regarding the role of councillors in connection with the use of social media, reference should be made to the council’s Social Media Protocol where there is one in place.

IF THINGS GO WRONG

Procedure for officers:

In normal circumstances - From time to time the relationship between councillors and the officer (or other employees) may break down or become strained. Whilst it is always preferable to resolve matters informally, it is important that the council adopts a formal grievance protocol or procedure. The principal council’s monitoring officer may be able to offer a mediation/conciliation role, or it may be necessary to seek independent advice.

The chair of the council should not attempt to deal with grievances or work-related performance or line management issues on their own. The council should delegate authority to a small group of councillors to deal with all personnel matters. The law requires all employers to have disciplinary and grievance procedures.

Adopting a grievance procedure enables individual employees to raise concerns, problems, or complaints about their employment in an open and fair way. Where the matter relates to a formal written complaint alleging a breach of the councillors' Code of Conduct the matter must be referred to the principal council's monitoring officer in the first instance in line with the Localism Act 2011. The council may however try to resolve any concerns raised informally before they become a formal written allegation.

In exceptional circumstances - If a councillor behaves in the following way:

1. Continually breaks STC policy guidelines with impunity and without remorse
2. Brings STC into disrepute by undermining its processes, procedures, or officers' integrity
3. Sends communications to officers which are overly burdensome or unreasonably vexatious
4. Frequently uses language in communications which is harassing, bullying, gas-lighting, intimidating, . threatening or disrespectful either directly or indirectly to a STC officer/s.
5. Is often within public meetings attempting to undermine the position of the clerk's office.

Then, in the first instance, the clerk needs to point out the nature of the problem, as he perceives it, to the councillor. If the councillor is not willing to modify his or her behaviour after several attempts by the Clerk and or other councillors, then the matter should be taken to the STC Personnel Committee for resolution. If the Councillor does not abide by this committee's suggested resolution, then the Personnel Committee should meet once again and in this exceptional circumstance should resolve to allow the Clerk not to communicate nor open any communication with that councillor for a period of 4 months by way of undertaking its duty of care to that officer.

This resolution should not be taken lightly, neither should it however be seen as a sanction, as indeed it is not possible for a council to impose sanctions upon a councillor no matter how extreme the behaviour might be. Rather, a clerk is allowed to not reply anyway, and so this merely formalises the situation. {This imposition should be termed 'respect resolution'}.
During this 4-month period the councillor is able to receive meetings summons, and associated paperwork and is able to undertake his or her town councillor duties normally. Should this councillor require urgent business undertaken, then the Chair and or Deputy Clerk is charged with replying and ensuring the matter is dealt with appropriately if necessary to do so.

After 4 months have elapsed, the councillor should be invited to meet directly with the Personnel Committee in order that modified behaviour can be agreed upon, and a more collaborative working relationship put in place, then a line should be drawn, and normal practice resumed.

Procedure for councillors:

If a councillor is dissatisfied with the conduct, behaviour or performance of the officer or another employee, the matter should be reported to the chair and then raised with the officer in the first instance. If the matter cannot be resolved informally, it should be taken to the STC Personnel Committee for an impartial judgement and thereby resolution and it may be necessary to invoke the council's disciplinary procedure if that decision is in favour of the councillor's complaint.

Either way, the Personnel Committee should agree upon a response to the Councillor and inform them of that decision – which should end the matter.

STEYNING TOWN COUNCIL

CODE OF MEMBERS' CONDUCT

Adopted by Full Council on 18th May 2026

Statement from Horsham District Council Standards Committee

The role of Councillor across all tiers of local government is a vital part of our country's system of democracy. It is important that as Councillors we can be held accountable, and all adopt the behaviours and responsibilities associated with the role. Our conduct as individual Councillors affects the reputation of all Councillors. We want the role of Councillor to be one that people aspire to. We also want individuals from a range of backgrounds and circumstances to be putting themselves forward to become Councillors.

As Councillors, we represent local residents, work to develop better services and deliver local change. The public have high expectations of us and entrust us to represent our local area; taking decisions fairly, openly, and transparently. We have both an individual and collective responsibility to meet these expectations by maintaining high standards and demonstrating good conduct, and by challenging behaviour which falls below expectations.

Importantly, we should be able to undertake our role as a Councillor without being intimidated, abused, bullied or threatened by anyone, including the general public.

This Code has been designed to protect our democratic role, encourage good conduct and safeguard the public's trust in local government.

NB - This Model Code of Conduct was agreed by HDC and distributed for adoption to all Councils under its control to ensure continuity of service provision, and was amended by STC Councillors on the 21st February 2022 at the Full Council meeting to suit the needs and requirements of STC and then adopted at that meeting

Introduction

The Local Government Association (LGA) has developed this Model Councillor Code of Conduct, in association with key partners and after extensive consultation with the sector, as part of its work on supporting all tiers of local government to continue to aspire to high standards of leadership and performance. It is a template for councils to adopt in whole and/or with local amendments.

All councils are required to have a local Councillor Code of Conduct.

The LGA will undertake an annual review of this Code to ensure it continues to be fit-for-purpose, incorporating advances in technology, social media and changes in legislation. The LGA can also offer support, training and mediation to councils and Councillors on the application of the Code and the National Association of Local Councils (NALC) and the county associations of local Councils can offer advice and support to Town and Parish Councils. The LGA have provided additional guidance notes, and these can be found on the link below:

https://www.local.gov.uk/publications/guidance-local-government-association-model-councillor-code-conduct

Definitions

For the purposes of this Code of Conduct, a "Councillor" means a Member or co-opted Member of a Local Authority or a directly elected Mayor. A "co-opted Member" is defined in the Localism Act 2011 Section 27(4) as "a person who is not a Member of the authority but who

a) is a Member of any committee or sub-committee of the authority, or;
b) is a Member of, and represents the authority on, any joint committee or joint sub-committee of the authority;

and who is entitled to vote on any question that falls to be decided at any meeting of that committee or sub-committee".

For the purposes of this Code of Conduct, "local authority" covers county councils, district councils, London borough councils, parish councils, town councils, neighbourhood councils, fire and rescue authorities, police authorities, joint authorities, economic prosperity boards,combined authorities and National Park authorities.

Purpose of the Code of Conduct

The purpose of this Code of Conduct is to assist you, as a Councillor, in modelling the behaviour that is expected of you, to provide a personal check and balance, and to set out the type of conduct that could lead to action being taken against you. It is also to protect you, the public, fellow Councillors, Local Authority officers and the reputation of local government. It sets out general principles of conduct expected of all Councillors and your specific obligations in relation to standards of conduct. The LGA encourages the use of support, training and mediation prior to action being taken using the Code. The fundamental aim of the Code is to create and maintain public confidence in the role of Councillor and local government.

General principles of Councillor conduct

Everyone in public office at all levels; all who serve the public or deliver public services, including ministers, civil servants, Councillors and Local Authority officers; should uphold the Seven Principles of Public Life, also known as the Nolan Principles.

Building on these principles, the following general principles have been developed specifically for the role of Councillor.

In accordance with the public trust placed in me, on all occasions:

- I act with integrity and honesty
- I act lawfully
- I treat all persons fairly and with respect; and
- I lead by example and act in a way that secures public confidence in the role of Councillor.

In undertaking my role:

- I impartially exercise my responsibilities in the interests of the local community
- I do not improperly seek to confer an advantage, or disadvantage, on any person
- I avoid conflicts of interest
- I exercise reasonable care and diligence; and
- I ensure that public resources are used prudently in accordance with my Local Authority's requirements and in the public interest.

Application of the Code of Conduct

This Code of Conduct applies to you as soon as you sign your declaration of acceptance of the office of councillor or attend your first meeting as a co-opted Member and continues to apply to you until you cease to be a councillor.

This Code of Conduct applies to you when:

- you are acting in your capacity as a Councillor and/or as a representative of your Council

- you are claiming to act as a Councillor and/or as a representative of your council

- you are giving the impression that you are acting as a Councillor and/or as a representative of your Council

- you refer publicly to your role as a Councillor or use knowledge you could only obtain in your role as a Councillor.

The Code applies to all forms of communication and interaction, including:

- at face-to-face meetings
- at online or telephone meetings
- in written communication
- in verbal communication
- in non-verbal communication
- in electronic and social media communication, posts, statements and comments.

You are also expected to uphold high standards of conduct and show leadership at all times.

Your Monitoring Officer has statutory responsibility for the implementation of the Code of Conduct, and you are encouraged to seek advice from your Monitoring Officer on any matters that may relate to the Code of Conduct. Town and Parish Councillors are encouraged to seek advice from their Clerk, who may refer matters to the Monitoring Officer.

Standards of Councillor conduct

This section sets out your obligations, which are the minimum standards of conduct required of you as a Councillor. Should your conduct fall short of these standards, a complaint may be made against you, which may result in action being taken.

Guidance is included to help explain the reasons for the obligations and how they should be followed.

General Conduct

1. Respect

As a Councillor:

1.1 I treat other Councillors and members of the public with respect.

1.2 I treat Local Authority employees, employees and representatives of partner organisations and those volunteering for the Local Authority with respect and respect the role they play.

Respect means politeness and courtesy in behaviour, speech, and in the written word. Debate and having different views are all part of a healthy democracy. As a Councillor, you can express, challenge, criticise and disagree with views, ideas, opinions and policies in a robust but civil manner. You should not, however, subject individuals, groups of people or organisations to personal attack.

In your contact with the public, you should treat them politely and courteously. Rude and offensive behaviour lowers the public's expectations and confidence in Councillors.

In return, you have a right to expect respectful behaviour from the public. If members of the public are being abusive, intimidatory or threatening you are entitled to stop any conversation or interaction in person or online and report them to the Local Authority, (you can contact the Monitoring Officer or Standards Team) and/or the relevant social media provider or the police. This also applies to fellow Councillors, where action could then be taken under the Councillor Code of Conduct, and Local Authority employees, where concerns should be raised in line with the Local Authority's Councillor-officer protocol.

2. Bullying, harassment and discrimination

As a Councillor:

2.1 I do not bully any person.

2.2 I do not harass any person.

2.3 I promote equality and do not discriminate unlawfully against any person.

The Advisory, Conciliation and Arbitration Service (ACAS) characterises bullying as offensive, intimidating, malicious or insulting behaviour, an abuse or misuse of power through means that undermine, humiliate, denigrate or injure the recipient. Bullying might be a regular pattern of behaviour or a one-off incident, happen face-to-face, on social media, in emails or phone calls, happen in the workplace or at work social events and may not always be obvious or noticed by others.

The Protection from Harassment Act 1997 defines harassment as conduct that causes alarm or distress or puts people in fear of violence and must involve such conduct on at least two occasions. It can include repeated attempts to impose unwanted communications and contact upon a person in a manner that could be expected to cause distress or fear in any reasonable person.

Unlawful discrimination is where someone is treated unfairly because of a protected characteristic. Protected characteristics are specific aspects of a person's identity defined by the Equality Act 2010. They are age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

The Equality Act 2010 places specific duties on local authorities. Councillors have a central role to play in ensuring that equality issues are integral to the Local Authority's performance and strategic aims, and that there is a strong vision and public commitment to equality across public services.

3. Impartiality of officers of the council

As a Councillor:

3.1 I do not compromise, or attempt to compromise, the impartiality of anyone who works for, or on behalf of, the Local Authority.

Officers work for the Local Authority as a whole and must be politically neutral (unless they are political assistants). They should not be coerced or persuaded to act in a way that would undermine their neutrality. You can question officers in order to understand, for example, their reasons for proposing to act in a particular way, or the content of a report that they have written. However, you must not try and force them to act differently, change their advice, or alter the content of that report, if doing so would prejudice their professional integrity.

4. Confidentiality and access to information

As a Councillor:

4.1 I do not disclose information:

- **a. given to me in confidence by anyone**
- **b. acquired by me which I believe, or ought reasonably to be aware, is of a confidential nature, unless**
  - **i. I have received the consent of a person authorised to give it;**
  - **ii. I am required by law to do so;**
  - **iii. the disclosure is made to a third party for the purpose of obtaining professional legal advice provided that the third party agrees not to disclose the information to any other person; or**
  - **iv. the disclosure is:**
    1. **reasonable and in the public interest; and**
    2. **made in good faith and in compliance with the reasonable requirements of the Local Authority; and**
    3. **made in consultation with either the Clerk in the first instance and or the Monitoring Officer prior to its release.**

4.2 I do not improperly use knowledge gained solely as a result of my role as a Councillor for the advancement of myself, my friends, my family members, my employer or my business interests.

4.3 I do not prevent anyone from getting information that they are entitled to by law.

Local authorities must work openly and transparently, and their proceedings and printed materials are open to the public, except in certain legally defined circumstances. You should work on this basis, but there will be times when it is required by law that discussions, documents and other information relating to or held by the Local Authority must be treated in a confidential manner. Examples include personal data relating to individuals or information relating to ongoing negotiations.

5. Disrepute

As a Councillor:

5.1 I do not bring my role or Local Authority into disrepute.

As a Councillor, you are trusted to make decisions on behalf of your community and your actions and behaviour are subject to greater scrutiny than that of ordinary members of the public. You should be aware that your actions might have an adverse impact on you, other Councillors and/or your Local Authority and may lower the public's confidence in your or your Local Authority's ability to discharge your/ its functions. For example, behaviour that is considered dishonest and/or deceitful can bring your Local Authority into disrepute.

You are able to hold the Local Authority and fellow Councillors to account and are able to constructively challenge and express concern about decisions and processes undertaken by the council whilst continuing to adhere to other aspects of this Code of Conduct.

6. Use of position

As a Councillor:

6.1 I do not use, or attempt to use, my position improperly to the advantage or disadvantage of myself or anyone else.

Your position as a Member of the Local Authority provides you with certain opportunities, responsibilities and privileges, and you make choices all the time that will impact others. However, you should not take advantage of these opportunities to further your own or others' private interests or to disadvantage anyone unfairly.

7. Use of Local Authority resources and facilities

As a Councillor:

7.1 I do not misuse Council resources.

7.2 I will, when using the resources of the Local Authority or authorising their use by others:

a. act in accordance with the Local Authority's requirements; and

b. ensure that such resources are not used for political purposes unless that use could reasonably be regarded as likely to facilitate, or be conducive to, the discharge of the functions of the Local Authority or of the office to which I have been elected or appointed.

You may be provided with resources and facilities by the Local Authority to assist you in carrying out your duties as a Councillor.

Examples include:

- office support
- stationery
- equipment such as phones, and computers
- transport
- access and use of Local Authority buildings and rooms.

These are given to you to help you carry out your role as a Councillor more effectively and are not to be used for business or personal gain. They should be used in accordance with the purpose for which they have been provided and the Local Authority's own policies regarding their use.

8. Complying with the Code of Conduct

As a Councillor:

8.1 I undertake Code of Conduct training provided by my Local Authority.

8.2 I cooperate with any Code of Conduct investigation and/or determination.

8.3 I do not intimidate or attempt to intimidate any person who is likely to be involved with the administration of any investigation or proceedings.

8.4 I comply with any sanction imposed on me following a finding that I have breached the Code of Conduct.

It is extremely important for you as a Councillor to demonstrate high standards, for you to have your actions open to scrutiny and for you not to undermine public trust in the Local Authority or its governance. If you do not understand or are concerned about the Local Authority's processes in handling a complaint you should raise this with your Monitoring Officer.

Protecting your reputation and the reputation of the Local Authority

9. Interests

As a Councillor:

9.1 I register and declare my interests.

You need to register your interests so that the public, Local Authority employees and fellow Councillors know which of your interests might give rise to a conflict of interest. The register is a public document that can be consulted when (or before) an issue arises. The register also protects you by allowing you to demonstrate openness and a willingness to be held accountable. You are personally responsible for deciding whether or not you should declare an interest in a meeting, but it can be helpful for you to know early on if others think that a potential conflict might arise. It is also important that the public know about any interest that might have to be declared by you or other Councillors when making or taking part in decisions, so that decision making is seen by the public as open and honest. This helps to ensure that public confidence in the integrity of local governance is maintained.

You should note that failure to register or declare a disclosable pecuniary (i.e. financial) interest is a criminal offence under the Localism Act 2011.

Appendix B sets out the detailed provisions on registering and declaring interests. If in doubt, you should always seek advice from your Monitoring Officer.

10. Gifts and hospitality

As a Councillor:

10.1 I do not accept gifts or hospitality, irrespective of value, which could give rise to a reasonable suspicion of influence on my part to show favour from persons seeking to acquire, develop or do business with the Local Authority or from persons who may apply to the Local Authority for any permission, licence or other significant advantage.

10.2 I register with the Monitoring Officer any gift or hospitality with an estimated value of at least £50 within 28 days of its receipt.

10.3 I register with the Monitoring Officer any significant gift or hospitality that I have been offered but have refused to accept.

In order to protect your position and the reputation of the Local Authority, you should exercise caution in accepting any gifts or hospitality which are (or which you reasonably believe to be) offered to you because you are a Councillor. The presumption should always be not to accept significant gifts or hospitality. However, there may be times when such a refusal may be difficult if it is seen as rudeness in which case you could accept it but must ensure it is publicly registered. However, you do not need to register gifts and hospitality which are not related to your role as a Councillor, such as Christmas gifts from your friends and family. It is also important to note that it is appropriate to accept normal expenses and hospitality associated with your duties as a Councillor. If you are unsure, do contact your Monitoring Officer for guidance.

Appendices

Appendix A – The Seven Principles of Public Life

The principles are:

Selflessness

Holders of public office should act solely in terms of the public interest.

Integrity

Holders of public office must avoid placing themselves under any obligation to people or organisations that might try inappropriately to influence them in their work. They should not act or take decisions in order to gain financial or other material benefits for themselves, their family, or their friends. They must declare and resolve any interests and relationships.

Objectivity

Holders of public office must act and take decisions impartially, fairly and on merit, using the best evidence and without discrimination or bias.

Accountability

Holders of public office are accountable to the public for their decisions and actions and must submit themselves to the scrutiny necessary to ensure this.

Openness

Holders of public office should act and take decisions in an open and transparent manner. Information should not be withheld from the public unless there are clear and lawful reasons for so doing.

Honesty

Holders of public office should be truthful.

Leadership

Holders of public office should exhibit these principles in their own behaviour. They should actively promote and robustly support the principles and be willing to challenge poor behaviour wherever it occurs.

Appendix B

Registering interests

1. Within 28 days of this Code of Conduct being adopted by the Local Authority or your election or appointment to office (where that is later) you must register with the Clerk the interests which fall within the categories set outin Table 1 (Disclosable Pecuniary Interests) and Table 2 (Other Registerable Interests). Disclosable Pecuniary Interests means issues relating to money and finances.

2. You must ensure that your register of interests is kept up-to-date and within 28 days of becoming aware of any new interest, or of any change to a registered interest, notify the Clerk.

3. A 'sensitive interest' is as an interest which, if disclosed, could lead to the Councillor/Member or co-opted Member, or a person connected with the Member or co-opted Member, being subject to violence or intimidation.

4. Where you have a 'sensitive interest' you must notify the Clerk with the reasons why you believe it is a sensitive interest. If the Clerk agrees they will withhold the interest from the public register.

Declaring interests

5. Where a matter arises at a meeting which directly relates one of your Disclosable Pecuniary Interests, you must declare the interest, not participate in any discussion or vote on the matter and must not remain in the room unless you have been granted a dispensation. If it is a 'sensitive interest', you do not have to declare the nature of the interest, just that you have an interest.

6. Where a matter arises at a meeting which directly relates to one of your Other Registerable Interests, you must declare the interest. You may speak on the matter only if members of the public are also allowed to speak at the meeting but otherwise must not take part in any discussion or vote on the matter and must not remain in the room unless you have been granted a dispensation. If it is a 'sensitive interest', again you do not have to declare the nature of the interest.

7. Where a matter arises at a meeting which *directly relates* to your financial interest or well-being (and is not a Disclosable Pecuniary Interest) or a financial interest or well-being of a relative or close associate, you must declare the interest. You may speak on the matter only if members of the public are also allowed to speak at the meeting but otherwise must not take part in any discussion or vote on the matter and must not remain in the room unless you have been granted a dispensation. If it is a 'sensitive interest', you do not have to declare the nature of the interest.

8. Where a matter arises at a meeting which *affects* –
    a. your own financial interest or well-being;
    b. a financial interest or well-being of a friend, relative, close associate; or
    c. a financial interest or wellbeing of a body included under Other Registrable Interests as set out in **Table 2**

    you must disclose the interest. In order to determine whether you can remain in the meeting after disclosing your interest the following test should be applied.

9. Where the matter affects the financial interest or well-being of a person or body referred to in paragraph 8 above:
    a. to a greater extent than it affects the financial interests of the majority of inhabitants of the ward or parish affected by the decision and;
    b. a reasonable member of the public knowing all the facts would believe that it would affect your view of the wider public interest

   you must declare the interest. You may speak on the matter only if members of the public are also allowed to speak at the meeting but must not take part in any discussion or vote on the matter and must not remain in the room unless you have been granted a dispensation. If it is a 'sensitive interest', you do not have to declare the nature of the interest.

Table 1: Disclosable Pecuniary Interests

This table sets out the explanation of Disclosable Pecuniary Interests as set out in the Relevant Authorities (Disclosable Pecuniary Interests) Regulations 2012.

Subject	Description
Employment, office, trade, profession or vocation	Any employment, office, trade, profession or vocation carried on for profit or gain.
Sponsorship	Any payment or provision of any other financial benefit (other than from the council) made to the Councillor during the previous 12-month period for expenses incurred by him/her in carrying out his/her duties as a Councillor, or towards his/her election expenses. This includes any payment or financial benefit from a trade union within the meaning of the Trade Union and Labour Relations (Consolidation) Act 1992.

Contracts	Any contract made between the Councillor or his/her spouse or civil partner or the person with whom the Councillor is living as if they were spouses/civil partners (or a firm in which such person is a partner, or an incorporated body of which such person is a director* or a body that such person has a beneficial interest in the securities of*) and the council — (a) under which goods or services are to be provided or works are to be executed; and (b) which has not been fully discharged.

Land and Property	Any beneficial interest in land which is within the area of the Council. (a) 'Land' excludes an easement, servitude,interest or right in or over land which does not give the Councillor or his/her spouse or civil partner or the person with whom the Councillor is living as if they were spouses/ civil partners (aloneor jointly with another) a right to occupy or to receive income.
Licences	Any licence (alone or jointly with others) to occupy land in the area of the council for a month or longer
Corporate tenancies	Any tenancy where (to the Councillor's knowledge)— (a) the landlord is the Council; and the tenant is a body that the Councillor, or his/her spouse or civil partner or the person with whom the Councillor is living as if they were spouses/ civil partners is a partner of ora director* of or has a beneficial interestin the securities* of.

Securities	Any beneficial interest in securities* of a body where— (a) that body (to the Councillor's knowledge) has a place of business or land in the area of the council; and (b) either— (i) the total nominal value of the securities* exceeds £25,000 or one hundredth of the total issued share capital of that body; or (ii) if the share capital of that body is of more than one class, the total nominal value of the shares of any one class in which the Councillor, or his/ her spouse or civil partner or the person with whom the Councillor is living as if they were spouses/civil partners has a beneficial (b) interest exceeds one hundredth of thetotal issued share capital of that class.

* 'director' includes a member of the committee of management of an industrial and provident society.

* 'securities' means shares, debentures, debenture stock, loan stock, bonds, units of a collective investment scheme within the meaning of the Financial Services and Markets Act 2000 and other securities of any description, other than money deposited with a building society.

Table 2: Other Registerable Interests

You must register as an Other Registerable interest:

A: Any unpaid Directorships	
B: Any Body of which you are a member or in a position of general control or management and to which you are appointed or nominated by the council;	
C: Any Body -	(i) exercising functions of a public nature; (ii) directed to charitable purposes; or (iii) one of whose principal purposes includes the influence of public opinion or policy (including any political party ortrade union)
of which you are a member or in a position of general control or management.	

Appendix C – the Committee on Standards in Public Life

The LGA has undertaken this review whilst the Government continues to consider the recommendations made by the Committee on Standards in Public Life in their report on Local Government Ethical Standards. If the Government chooses to implement any of the recommendations, this could require a change to this Code.

The recommendations cover:

- Recommendations for changes to the Localism Act 2011 to clarify in law when the Code of Conduct applies
- The introduction of sanctions
- An appeals process through the Local Government Ombudsman
- Changes to the Relevant Authorities (Disclosable Pecuniary Interests) Regulations 2012
- Updates to the Local Government Transparency Code
- Changes to the role and responsibilities of the Independent Person
- That the criminal offences in the Localism Act 2011 relating to Disclosable Pecuniary Interests should be abolished

The Local Government Ethical Standards report also includes Best Practice recommendations. These are:

Best practice 1: Local authorities should include prohibitions on bullying and harassment in codes of conduct. These should include a definition of bullying and harassment, supplemented with a list of examples of the sort of behaviour covered by such a definition.

Best practice 2: Councils should include provisions in their code of conduct requiring Councillors to comply with any formal standards investigation and prohibiting trivial or malicious allegations by Councillors.

Best practice 3: Principal authorities should review their code of conduct each year and regularly seek, where possible, the views of the public, community organisations and neighbouring authorities.

Best practice 4: An authority's code should be readily accessible to both Councillors and the public, in a prominent position on a council's website and available in council premises.

Best practice 5: Local authorities should update their gifts and hospitality register at least once per quarter, and publish it in an accessible format, such as CSV.

Best practice 6: Councils should publish a clear and straightforward public interest test against which allegations are filtered.

Best practice 7: Local authorities should have access to at least two Independent Persons.

Best practice 8: An Independent Person should be consulted as to whether to undertake a formal investigation on an allegation, and should be given the option to review and comment on allegations which the responsible officer is minded todismiss as being without merit, vexatious, or trivial.

Best practice 9: Where a Local Authority makes a decision on an allegation of misconduct following a formal investigation, a decision notice should be published as soon as possible on its website, including a brief statement of facts, the provisions of the code engaged by the allegations, the view of the Independent Person, the reasoning of the decision-maker, and any sanction applied.

Best practice 10: A Local Authority should have straightforward and accessible guidance on its website on how to make a complaint under the code of conduct, the process for handling complaints, and estimated timescales for investigations and outcomes.

Best practice 11: Formal standards complaints about the conduct of a Parish Councillor towards a clerk should be made by the chair or by the Parish Council as a whole, rather than the clerk in all but exceptional circumstances.

Best practice 12: Monitoring Officers' roles should include providing advice, support and management of investigations and adjudications on alleged breaches to Parish Councils within the remit of the principal authority. They should be provided with adequate training, corporate support and resources to undertake this work.

Best practice 13: A Local Authority should have procedures in place to address any conflicts of interest when undertaking a standards investigation. Possible steps should include asking the Monitoring Officer from a different authority to undertake the investigation.

Best practice 14: Councils should report on separate bodies they have set up or which they own as part of their annual governance statement and give a full picture of their relationship with those bodies. Separate bodies created by local authorities should abide by the Nolan principle of openness and publish their board agendas and minutes and annual reports in an accessible place.

Best practice 15: Senior officers should meet regularly with political group leaders or group whips to discuss standards issues.

The LGA has committed to reviewing the Code on an annual basis to ensure it is still fit for purpose.

STEYNING TOWN COUNCIL

DISPENSATIONS SCHEME

1 Applicability

The following arrangements for seeking dispensations from prohibitions on participation apply from 1 July 2012. The statutory basis for the rules is to be found in the Localism Act 2011 sections 33 and 31(1) and (4).

The authority may on a written request made to the proper officer by a member or co-opted member of the authority grant a dispensation (a) relieving the member or co-opted member from either or both of the restrictions in section 31(4) of the Localism Act in cases described in the dispensation and/or (b) relieving the member or co-opted member from the restrictions in Paragraph 12 of the Code of Member's Conduct in cases described in the dispensation.

2 Legal Criteria

2.1 If a member or co-opted member of the authority (a) is present at a meeting of the authority, or of any committee, sub-committee, joint committee of the authority (b) has a disclosable pecuniary interest and/or a prejudicial interest in any matter to be considered, or being considered at the meeting, and (c) is aware that the condition in paragraph (b) is met the member or co-opted member may not participate in the matter.

2.2 These rules apply:

2.2.1 to either or both of the prohibitions from participation set out in the Localism Act 2011 section 31(4) concerning the matter in which a member or co-opted member has a disclosable pecuniary interest; and

2.2.2 to prohibitions from participation concerning a matter in which a member or co-opted member has a prejudicial interest.

Section 31(4) of the Localism Act 2011 provides in relation to disclosable pecuniary interests: "(4) The member or co-opted member may not -

(a) participate, or participate further, in any discussion of the matter at the meeting, or (b) participate in any vote, or further vote, taken on the matter at the meeting but this is subject to section 33"

Paragraph 12 (1) of the Code of Member's Conduct provides in relation to prejudicial interests:

> "(1) Where you have a prejudicial interest in any business of your authority:
>
> (a) you must withdraw from the room or chamber where a meeting considering the business is being held (i) in a case where sub-paragraph (2) applies, immediately after making representations, answering questions or giving evidence; (ii) in any other case, whenever it becomes apparent that the business is being considered at that meeting; unless you have obtained a dispensation from your authority."

2.3 A dispensation can only be granted if after having had regard to all relevant circumstances the authority:

2.3.1 considers that without the dispensation the number of persons prohibited by section 31(4) from participation in any particular business would be so great a proportion of the body transacting the business as to impede the transaction of the business, or

2.3.2 considers that without the representation of different political groups on the body transacting any particular business would be so upset as to alter the likely outcome of any vote relating to the business, or]

2.3.3 considers that granting the dispensation is in the interests of persons living in the authority's area, or

2.3.4 considers that it is otherwise appropriate to grant a dispensation.

3 Maximum period

A dispensation will specify the period for which it has effect and the period specified may not last for more than 4 years from the date of the giving of the dispensation.

4 How to apply for a dispensation

If a member wishes to seek dispensation to enable him or her to participate in the consideration of a matter from which he or she would be excluded by the provisions of section 31(4) of the Localism Act 2011 or the Code, he or she should write to or email the Clerk a request for a dispensation explaining why it is desirable for a dispensation to be granted. At least fourteen days' notice must be given before the dispensation is required to enable the appropriate committee together with all necessary consultations to be undertaken.

5 Records

The authority will record the existence, duration and nature of any dispensation and the record is to be kept with the register of members' interests and a copy provided to the authority's monitoring officer.

6 The authority's Finance & Community Committee's consideration of an application for dispensation

The following is a summary of what might be regarded as good practice in considering an application for a dispensation:

6.1 Dispensations should be granted only in exceptional circumstances.

6.2 Dispensations cannot be granted other than in the circumstances set out in the Localism Act 2011 Section 33(2) set out in paragraph 2.3 above.

6.3 A dispensation cannot authorise a member to act unlawfully.

6.5 Any dispensation that has already been granted will be ignored when applying the legal criteria in paragraph 2.

6.6 The interest of the member seeking the dispensation will be balanced against the potential effect of the outcome of the vote if the member is unable to participate.

6.7 A dispensation may be granted to enable a member to speak only or to speak and vote.

6.8 A dispensation should not be granted where the dispensation would conflict with the general principles which underlie the Code of Members' Conduct:

6.8.1 **Selflessness**—members should serve only the public interest and should never improperly confer an advantage or disadvantage on any person.

6.8.2 **Integrity**—members should not place themselves in situations where their integrity may be questioned, should not behave improperly and should on all occasions avoid the appearance of such behaviour.

6.8.3 **Objectivity**—members should make decisions on merit, including when making appointments, awarding contracts, or recommending individuals for rewards or benefits.

6.8.4 **Accountability**—members should be accountable to the public for their actions and the manner in which they carry out their responsibilities and should co-operate fully and honestly with any scrutiny appropriate to their particular office.

6.8.5 **Openness** — members should be as open as possible about their actions and those of their authority and should be prepared to give reasons for those actions.

6.8.6 **Honesty** – Members should not place themselves in situations where their honesty may be questioned, should not behave dishonestly and should on all occasions avoid the appearance of such behaviour.

6.8.7 **Leadership** – members should promote and support these principles by leadership, and by example, and should act in a way that secures or preserves public confidence.

6.9 A dispensation should not be granted where the nature of the member's interest would damage public confidence in the conduct of the authority's business were the dispensation to be granted.

6.10 If a dispensation is granted it should usually be for one specific item of business at one meeting of the authority.

6.11 Consideration must take account of any legal requirement or statutory guidance issued by the Department for Communities and Local Government.

6.12 Section 31(4) of the Localism Act 2011 does not apply in relation to anything done for the purposes of deciding whether to grant a dispensation under this section.

7 Help

Further assistance can be obtained from the Clerk at clerk@steyningpc.gov.uk

Adopted by Full Council 18th May 2026

GRANT AWARDING POLICY

Introduction

A Town Council is empowered to incur expenditure in the execution of any works in order to exercise its statutory powers. There is also a power to incur expenditure for the benefit of the area, for some or all of its residents (Local Government Act 1972, section 137). Under these powers Steyning Town Council makes annual provision for grant aid for its residents.

As part of this commitment, the Council has for example, designated funds for two local organisations in order to support their work in the past. The first of these groups is *Steyning in Bloom*, which does so much to brighten up the look of our local community, and especially the High Street. Secondly, the *Vintage Years Group* which is a very significant partner in the Council's work to help combat 'Isolation and loneliness' in the Steyning Parish Community.
The remaining monies will be distributed to deserving volunteer groups and local charities to assist in their work within the parish of Steyning. The distribution of these general grant funds will be based upon their requirements and the compelling nature of their applications.

To qualify, the applicant must be able to demonstrate that funding will benefit the Town, or residents of the Town. Grants will normally be considered quarterly by Finance & General Purposes Committee (March, June, September, December), unless there are special circumstances which require more immediate consideration. In determining the validity of an application, the Council will refer to the following guidelines:

Examples of applications which will be considered include:

1. The purchasing of equipment either in part or in full.
2. The funding of transport (especially sustainable transport) to enable members to partake in a group trip or outing.
3. For training activities.
4. For activities that raise the profile of the area.
5. For temporary running costs of a viable group, that is experiencing a period of hardship.
6. For hosting special events or celebrations.
7. For the provision of recreational facilities.

NB As the Town Council has declared a climate emergency, it will look favourably upon schemes, projects, equipment, or provision that help create biodiversity or climate resilience, or which would help reduce energy or waste or water consumption.

Conditions:

1. Grants will not be awarded to individuals.
2. Additional applications within a 12-month period will not normally be considered
3. The award must be used for the purpose for which the application was made.
4. If the group is unable to use the award before the proposed end date, then an explanation should be provided to the Town Council.
5. Awards must be accounted for, and evidence of expenditure should be supplied as requested. If the council is not satisfied that the grant has been spent as defined; they reserve the right to require a refund.
6. Any grant must only be used for the purpose for which it was awarded unless the written approval of the Town Council has been obtained for a change in use of the grant monies.
7. Any unspent portion of the grant must be returned to the Town Council within 6 months after the proposed end date of the project.
8. Successful applicants that receive a grant are asked to submit a report within one year of the award date detailing how the grant has been used and the respective project costs. The report may include photos (if relevant to the project and use).
9. This policy may be amended at any time by the Council following a motion having been published on the agenda.

Eligibility:

Any Charity, Voluntary Group or Community Organisation operating within the parish that are of benefit to the local community, with the following two provisos:
i, The Town Council will NOT fund activities that it considers to be the responsibility of a Statutory Authority.
ii, Applications from schools for an activity that takes place within the school day will not be considered.

The Town Council will not fund activities outside its powers and functions, nor will it fund activities or services which are undertaken outside the Steyning Parish.

Submission of the Application:

1. Applications must be submitted to the Clerk via email or delivered to the Steyning Centre: Using and completing the grant application template attached.
2. Applications for grants over £250 should be supported by a copy of the latest set of annual accounts, these will be for the scrutiny of the Clerk and the F&GP Chair only.

Adopted by Full Council on the 18th May 2026

STC Grant Application

Organisation	Person responsible for financial Administration
Name	Name
Year of Formation	Telephone number
Current membership	Email address
Objectives (not more than 50 words)	Postal address

Steyning Parish Council has recognised there is a Climate Crisis and so it is desirable, though not essential, that your project, equipment, installation or other reason for funding focuses on one of the following - (please tick all that apply)

- ☐ **Biodiversity** - Rewilding to create more and better spaces for wildlife
- ☐ **Carbon Reduction** - Radically reducing carbon emissions
- ☐ **Climate Resilience** - Improving resilience to changing climate
- ☐ **Energy** - Transitioning to clean secure, affordable energy, or energy conservation
- ☐ **Food** - Developing a fairer or more sustainable food source
- ☐ **Transport** - Shifting to sustainable transport and improving air quality
- ☐ **Waste Reduction** - Reducing waste, increasing reuse, recycling and composting
- ☐ **Water** - Improving water quality and reducing consumption

Explain the purpose of your grant application and how this may benefit Steyning

Note - not more than 200 words + include pictures if possible of equipment to be funded, location etc to aid councillors understanding

Total anticipated cost of project / installation / other reason	Amount of Grant to be requested & when will it be required
£	**£**

Bank Account details for BACS Payment arrangements	
Bank Account Number -	**Bank Sort Code - - -**

☐ **I hereby certify that to the best of my knowledge the above information is correct and that the grants eligibility criteria and the terms and conditions are complied with**

☐ **I confirm that I will submit updates to the Council informing how the Grant was used to improve Steyning**

Signed .... **Dated** ....

Please return to the Council Office in person, by post or by email

WSALC Limited
Village Centre
Trinity Road
Hurstpierpoint
West Sussex,BN6 9UY
United Kingdom

016/25.26

VAT Number: GB372797157
T: 07881714526
E: admin@wsalc.co.uk

Steyning Parish Council
Council Office, The Steyning Centre
Fletchers Croft
Steyning
West Sussex
BN44 3XZ
United Kingdom

Invoice

Number:	**1931**
Date:	1st Apr '25
Due By:	8th Apr '25
Account:	STEYNING
Purchase Order:	

Qty	Description	Rate	Total
1	WSALC Subscription 2025/26	1,703.57	1,703.57
1	NALC Subscription 2025/26	385.98	385.98

Net:	£2,089.55
VAT @ 0%:	£0.00
TOTAL:	£2,089.55

Please make payment by bacs as this is the swiftest and most secure method:
Natwest Sort Code: 60-13-09 Account Number: 42329841 Account Name: West Sussex ALC Limited
Please reference your payment with the invoice number
If payments cannot be paid by bacs, cheques should be made payable to West Sussex ALC Limited and posted to Eastgate House, Dogflud Way, Farnham, Surrey. GU9 7UD.

Company Registration: 08500937

4036/107

Horsham Association of Local Councils
c/o 9 Pound Land, Godalming, GU7 1BX
Tel: 03303 450597
horshamalc@gmail.com
Chairman: Malcolm Eastwood
Secretary: Anna Beams

Steyning Parish Council
The Steyning Centre
Fletchers Croft
Steyning
BN44 3XZ

31st August 202

Invoice number: 23-24 022

HALC INVOICE

Annual subscription for HALC

01/04/23 – 31/03/24 **£20.00**

Please make cheques payable to:

Horsham Association of Local Councils

Post to: HALC, 9 Pound Lane, Godalming, Surrey, GU7 1BX

Or by bank transfer to (using invoice number as reference):

Horsham Association of Local Councils
(Co-operative Bank)
Sort Code: 08-92-99
Account: 6520463

Collar Factory, Suite 2.03
112 St. Augustine Street
Taunton
Somerset
TA1 1QN
Tel: 01823 253646
Email: finance@slcc.co.uk

SLCC
For Local Council Professionals ®

John Fullbrook
Steyning Parish Council
The Steyning Centre
Fletchers Croft
Steyning
West Sussex
BN44 3XZ

Invoice

Invoice No	MEM256762-1
Invoice Date	02/01/2026
Reference	

Quantity	Description	Unit Price	Net Amt	VAT %	VAT
1	Membership Fee: John Fullbrook (40398) Due:01/01/2026	£379.00	£379.00	0.00	£0.00

Collar Factory, Suite 2.03
112 St. Augustine Street
Taunton
Somerset
TA1 1QN
Tel: 01823 253646
Email: finance@slcc.co.uk

SLCC
For Local Council Professionals ®

Leanne Poole
Steyning Parish Council
The Steyning Centre
Fletchers Croft
Steyning
West Sussex
BN44 3XZ

Invoice

Invoice No	MEM257038-1
Invoice Date	02/01/2026
Reference	

Quantity	Description	Unit Price	Net Amt	VAT %	VAT
1	Membership Fee: Leanne Poole (53095) Due:01/01/2026	£316.00	£316.00	0.00	£0.00

Open Spaces Society

INVOICE

Steyning Parish Council
The Steyning Centre
Fletchers Croft
Steyning
BN44 3XZ

clerk@steyningpc.gov.uk

TEL 01491 573535
EMAIL hq@oss.org.uk
WEB www.oss.org.uk

Invoice no: 76295/26
Date: 15.5.26

Membership No : 76295

Item	No	Total
Annual subscription to the Open Spaces Society	1	£45.00
due from 1 June 2026		

Please note the OSS is not registered for VAT

Invoice Total **£45.00**

Please note the society's new bank details if making a BACS payment.

The Open Spaces Society

CAF Account

Sort Code: 40-52-40

Account No: 00035916

Ref: 76295

CAMPAIGNING SINCE 1865

Gallagher

Insurance | Risk Management | Consulting

Blenheim House
1-2 Bridge Street
Guildford
Surrey
GU1 4RY
www.ajg.com/uk

TO WHOM IT MAY CONCERN

23 September 2025

Dear Sirs

We are the Risk and Insurance Managers for the client below and have pleasure in confirming details of their insurance arrangements as follows:-

Insured Details:

Name(s)	**Steyning Parish Council**
Postal Address	**The Steyning Centre, Fletchers Croft, Steyning, West Sussex, BN44 3XZ, United Kingdom**
Our Ref	**1458353**
Business Description	**Parish Council**

Employers' Liability	
Insurer:	Hiscox Insurance Company Limited
Policy number:	8188757
Cover period:	1st September 2025 to 31st August 2026
Standard limit of £10,000,000:	Yes

Public Liability	
Insurer:	Hiscox Insurance Company Limited
Policy number:	8188757
Cover period:	1st September 2025 to 31st August 2026
Standard limit of £10,000,000:	Yes
Basis of limit:	Any one claim

Cover is subject to the full terms, conditions and exclusions of the policy.

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Obtaining the General Power of Competence **Item 14.4**

Briefing Notes

At the September 2023 Full Council Meeting it was agreed that SPC would obtain the ‘General Power of Competence’ via the following motion

To agree that SPC obtain the Power of Competence – Supporting papers explained what the General Power of Competence meant for this council and detailed how the Council had now become eligible to obtain this additional ‘power’. Cllr Young **proposed, seconded** by Cllr S Alexander, that as SPC fulfill the criteria for obtaining the ‘General Power of Competence’, it’s proposed that SPC agrees to use it should the need arise. **Agreed**

A local council must decide, at a full meeting of the council, that it meets the criteria for eligibility at that particular point in time. A resolution to this effect must be written clearly in the minutes of that meeting. **The council is then required to revisit that decision and make a new resolution at every ‘relevant’ annual meeting of the council to confirm that it still meets the criteria (if it does).** This means that eligibility remains in place until the first annual meeting of the council after the ordinary election even if the condition of the eligibility criteria has changed.

We compiled the following information so that members and residents can understand what the ‘Power of Competence’ means. This is the same information I supplied at last year’s meeting – as background reading for you if you so wish.

The Freedom of the General Power of Competence {GPC}

Councils no longer need to ask whether they have a specific power to act. GPC (LA 2011 s1(1)) gives local authorities, including eligible local councils, “the power to do anything that individuals generally may do” as long as they don’t break other laws. It is a ‘power of first resort’; this means that when searching for a power to act, the first question you ask is whether you can use GPC. To find the answer, you ask whether an individual is normally permitted to act in the same way. For example:

• An individual can’t put someone in prison – and neither can a local council (although, like an individual, the council can press for a prosecution).

• An individual can’t impose taxes on other people – so a local council can’t use GPC to raise taxes.

on the other hand, an individual

• could run a community shop or post office (provided they abide by relevant rules) – so a local council can do likewise;

• can set up a company to provide a service. GPC clearly permits a local council to engage in commercial activity as long as it sets up a company or co-operative society (s4) for this purpose

Sometimes a council can do things that an individual can’t do – such as creating byelaws, raising a precept or issuing fixed penalty notices – but it must do so using the specific original legislation. GPC does not mean that the council can delegate decisions to individual councillors – this is a procedural matter that remains enshrined in law.

The Government hopes that GPC gives local councils confidence in their legal capacity to act for their communities. It encourages councils to use this power to work with others in providing cost-effective services and facilities in innovative ways to meet the needs of local people. The council can lend or invest money; it can trade; it can even sell energy to the National Grid. If another authority has a statutory duty, then it remains their duty to provide that service (eg education, waste collection, social services) but local councils can still help out. For example, a local council can support a school in many ways, just as an individual might. It could even help a community trust to run a local school.

The council can undertake activities using GPC anywhere – not just in the parish (s1(4a)). It isn't necessary to worry whether the activity is for the benefit of the council, the area or the community (s1(4c)) although, in practice, parishioners might object if they can't see the benefit! And unlike the Local Government Act 1972, s137, it doesn't matter whether there are any other specific powers permitting the council to take action (s1(5)). So, for example, a council can use GPC to build a sports facility even though there is another power enabling it to do the same thing (Local Government (Miscellaneous Provisions) Act 1976 s19).

As always, the council is expected to act in accordance with the general principle of 'reasonableness' established by the Wednesbury court case in 1948. The judgement made it clear that a council can exercise reasonable discretion when interpreting legislation provided that it justifies its decision in terms of relevant, rather than irrelevant, matters.

The Two Criteria for Eligibility

1. Elected Councillors

At the precise moment that the council resolves that it meets the criteria, the number of councillors elected at the last ordinary election, or at a subsequent by-election, must equal or exceed two thirds of its total number of councillors.

Elected councillors include all councillors who stood for election (including at a bye-election) whether or not the election was contested. Co-opted or appointed councillors do not count as they are not elected.

Elected councillors include all councillors who stood for election whether or not the election was contested. Co-opted or appointed councillors do not count as they are not elected.

The total number of councillors means the number of seats on the council including those that might be vacant. If two thirds is not a whole number, then it must be rounded up to the next whole number. For example, if the number of councillors in total is 8 and two thirds is approximately 5.3, then the number of councillors that must be elected is 6.

2. A Qualified Clerk

The clerk must hold at least one of the sector-specific qualifications and should have completed the relevant training designed as part of the National Training Strategy for local councils. From April 2012, this training is undertaken as part of a clerk's preparation for one of the recognised sector-specific qualifications. Where a clerk studied for one of these qualifications before April 2012, they undertake the relevant training and must pass **Section 7 in Isolation Module** in order to be fully qualified for the purposes of the GPC (see CiLCA Section 7 & GPC section at top of this page).

The recognised sector-specific qualifications are:
1. The Certificate in Local Council Administration (CiLCA) awarded by Ascentis (or previously by Monitoring and Verification Board or the AQA). **If the CiLCA certificate was awarded pre 2012, you must also hold GPC Section 7 in Isolation Module certificate.**

2. Or one of the following higher education qualifications awarded by the University of Gloucestershire or its predecessor institutions, namely:

• The Certificate of Higher Education in Local Council Administration
• The first level of the Foundation Degree in Community Engagement
• The Certificate of Higher Education in Local Policy and Governance (the Level Four course)
• Any equivalent successor qualification

It is important that the council pays attention to the advice of its trained and qualified clerk when taking decisions to ensure that it acts lawfully.

Since GPC can be used for most of the activities of the council rather than for unusual one-off projects, the council cannot employ a clerk on a short-term contract specifically for using the power. If the council loses its qualified clerk or has insufficient elected councillors, then it must record its ineligibility at the next 'relevant' annual meeting of the council (after the ordinary election). If it has already started an activity under GPC for which there is no other specific power, it remains eligible for the purpose of completing that activity, but it can't start anything new under the power until it is in a position to make the formal decision that it meets the criteria. The council must go back to identifying whether it has a specific power to act and use the restricted s137 if there is no appropriate specific power. When entering into a contract under GPC, a council should be cautious if the contract lasts beyond the next annual meeting when the council might no longer be eligible to use GPC. There is a risk of legal action if the council ends the contract unexpectedly. It is wise to seek legal advice when setting up the contract.

Risks and Restrictions Limiting GPC

There are some risks associated with using GPC. Inadequate community support or insufficient funding are significant risks while there are several statutory or legal restrictions that a local council should consider before using the power. Clerks and councillors should be aware of the following restrictions that potentially could limit the use of GPC.

- If a council is already subject to a statutory duty, then that duty remains in place. So, for example, a local council that is eligible to use the GPC must continue to abide by its duties. For example:

– The council has a duty to act with regard to the likely effect on crime and disorder and to do all it can to prevent crime and disorder in its area (Crime and Disorder Act 2006 s17).
– The Natural Environment and Communities Act 2006 s40 imposes a duty on local councils to consider conserving biodiversity in exercising its functions.
– The Smallholding and Allotments Act 1908 s23(1) gives councils a duty to provide allotments if they are of the opinion that there is a demand for them.

- There are also many procedural and financial duties that remain in place for regulating the governance of a local council.
- Furthermore, the council must comply with employment law, Health and Safety legislation, equality legislation and duties related to data protection and freedom of information for example.
- The council must set up a company or co-operative society of it wishes to trade. If the council sets up a company or co-operative society, it must abide by company law. Councils are advised to refer to more detailed Government guidance on trading and on charging (see links below). The council can charge for services provided under GPC .
- Remember, if another authority has a statutory duty, then it remains their duty to provide that service (eg education). If you are worried that you might be encroaching on another authority's duty, then ask whether an individual, a private company or a community trust might be able to step in and help. If they can, then so can the local council (although it might need to set up an appropriate delivery body first).
- If the action, the council wishes to take is also covered by a specific power then any restrictions that apply to the overlapping power are still in force. So if existing legislation requires the council to ask permission before acting, then it must do so. For example, the council asks permission from the Highways Authority before doing work on roadside verges.

GPC is a power and not a source of money. It cannot be used to raise the precept and if loans are needed then normal procedures apply. The council can seek other sources of finance such as the Community Infrastructure Levy, grant funding, sponsorship, commercial activity and agreements with other authorities. As always, the council should ensure support from local taxpayers.

So councils cannot use GPC primarily to raise money, but they can receive income as a consequence of using the power for a different primary purpose. For example, a council could give financial assistance to a struggling local enterprise by purchasing share capital just as any individual could. Similarly the council could lend money to support a local activity and earn interest on the loan and it can raise sponsorship for a community project.

Although councils are encouraged to be innovative, they should be aware of the risks involved in using the power in addition to a lack of money or community support. For example:

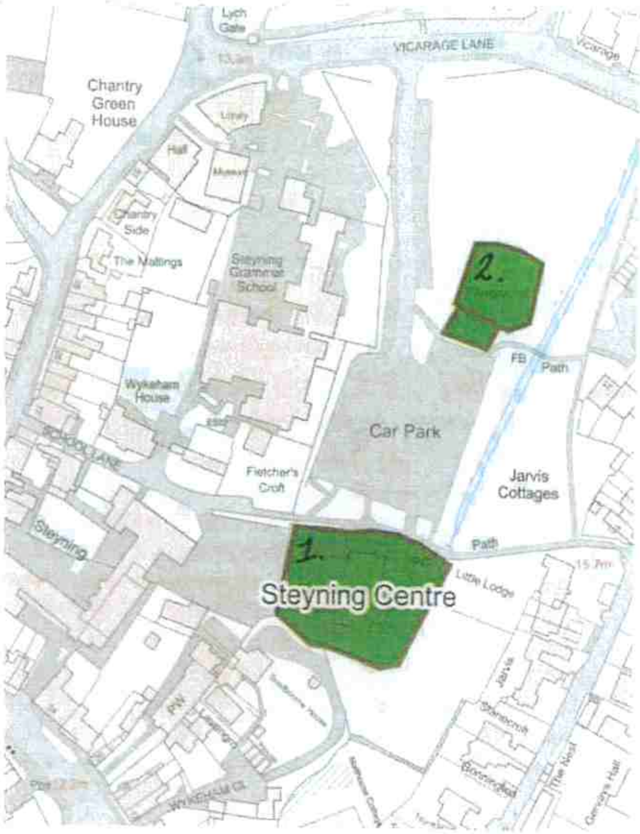
- There is a risk of being challenged
- Trading activities could damage competing local activities

The council risks its reputation and public money if a project goes wrong.

LAND REGISTER - For Steyning Town Council

{The details of this register were last reviewed in May 2023}
{Area estimated to nearest 10 meters squared}

1. Steyning Community Centre Land – Land surrounding the Steyning Community Centre. Includes tarmac access, Parking area, two patios, Grass lawn and decorative Borders, Trees and Benches.
Buildings on site – Steyning Community Centre, Adjoining Public Toilets & 1 Shed.
Registered 1st October 1991
Title Number - ***WSX166216- 1991***
Freehold
Ordnance Survey Reference: ***TQ 178/112***
Address – *Fletchers Croft, Steyning*
West Sussex, BN44 3XZ
Area *– 2,300 Meters* ^{2}



2. Fletcher's Croft Play area – Land leased from HDC. Large play area bounded by fencing with tarmacked 'open' Fitness zone adjacent including equipment and exercise framework.
Title Number – ***WSX294881***
Licenced for every 5-year period
Current period 2022 to 2027
Ordnance Survey Reference: ***TQ 179/113***
Address – *Fletchers Croft, Steyning*
West Sussex, BN44 3XZ
Area *– 830 Meters* ^{2}

3. Chandler's Way Play Area – Accessed via Chandlers Way, but footpath the property of WSCC. Bounded by Laines Road and Chandlers Way properties. No access from Laines Road.
Grassed space with small children's play area.
Registered 2 October 1984
Title Number – ***WSX147959***
Freehold
Ordnance Survey Reference: ***TQ 173/108***
Address – *Chandlers Way, Steyning,*
West Sussex, BN44 3NG
Area *– 1,380 Meters* ^{2}

4. Cripps Lane – Small parcel of land on the junction with Jarvis Lane containing mostly hedge and trees.
Registered 5th March 1973
Title Number – ***SX152550***
Freehold
Ordnance Survey Reference: ***TQ 182/113***
Address – *Fletchers Croft, Steyning*
West Sussex, BN44 3YD
Area *- 250 Meters* ^{2}

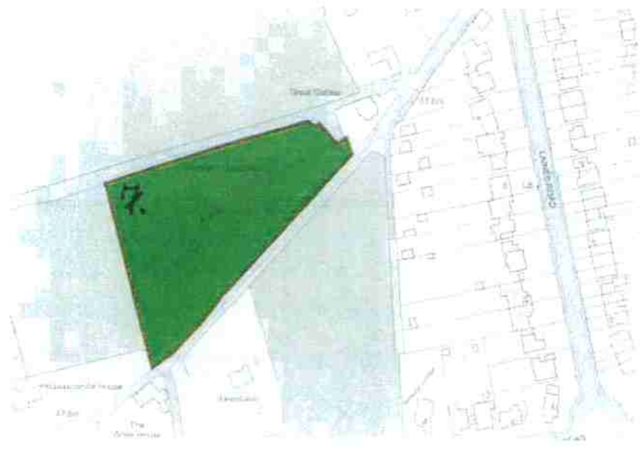
5. Memorial Playing Field – This land is within the conservation area and the western half is within the curtilage of the South Downs National Park. It is registered as Village Greens VG93 and VG65. Bounded by Charlton Street, Newham Lane, and the Mill Road Footpath, with Rublees allotments to the West, and contains land and buildings leased to sports clubs. Also includes Cricket pitch, large children's Play Area, Orchard, Basketball hard court and large grassed area sometimes marked for sports pitches. Also, Parish Council owned Changing Facilities (Building), plus tarmacked Car Park for 18 Cars.

Conveyance Documents held
Part of the land is unregistered
Title Numbers - ***WSX 118062*** – Details pending
(Land formally known as Newham Land Nursery)
Freehold
Tennis Courts Area Leasehold for 25 years from 2nd December 2010 - ***WSX340741*** *(includes building and Hard courts)*
Cricket Club Area Leasehold for 20 years - from 2008
(Includes Building, Sheds, Cricket Nets, Grass Pitch and 2 Astro turf pitches)
Bowls Club Area Leasehold for 6 years - from 2020
(Includes Building, Outhouses, and Bowling Green)

Ordnance Survey Reference: ***TQ 174/112***
Address *– Charlton Street, Steyning, West Sussex BN44 3LE*
Area *– 45,240 Meters²*

6. Allotments – Rublees (87 plots) –
Accessed from Newham Lane and Mill Road footpath. It is bounded by the MPF, Newham Lane and a public footpath to the Lower and Upper Horseshoe.
This land is within the South Downs National Park.
Title Number – Details pending
Purchased 3rd March 1979
(Occupied as Allotments since 1947)
Freehold
Ordnance Survey Reference: ***TQ 173/112***
Address – *Fletchers Croft, Steyning West Sussex, BN44 3XZ*
Area *– 12,800 Meters²*

7. Allotments – Canada Gardens (50 plots) - Accessed via Newham Lane, bounded by Newham Lane and dirt track road. This land is within the South Downs National Park.
Title Number – Details pending
Freehold – Land transferred to Steyning Parish Council on 30th September 1946.
Document Envelope D10062.
Conveyance Document held
Ordnance Survey Reference: ***TQ 171/107***
Address – *Fletchers Croft, Steyning West Sussex, BN44 3XZ*
Area *– 7,550 Meters²*



8. South Ash Play area – Accessed from South Ash and bounded by properties in Middle Mead. Almost entirely tarmacked small children's Play area with two pieces of equipment and one seat. The fence abounding 34 Middle Mead is a jointly owned boundary.

Title Number WSX 147572
Freehold
Ordnance Survey Reference: ***TQ 179/117***
Address – *South Ash, Steyning,*
West Sussex, BN44 3SJ
Area *- 210 Meters* ^{2}

9. Abbey Road Land – Open space which is registered as a village green. The eastern area forms a meadow (as requested by residents) and is mown once yearly, with small pond and trees on east boundary and in centre of area. The area to the west is mown regularly to provide an open space for recreation. A stream runs adjacent its northern boundary. There is an Orchard development to the west and a volunteer assisted Land management plan enabling some rewilding.

Registered 31st December 1999
Title Numbers – ***WSX240572 , WSX192659***
Freehold
Ordnance Survey Reference: ***TQ 179/115 and TQ 181/116***
Address – *Abbey Road, Steyning,*
West Sussex, BN44 3SQ
Area *– 7,350 and 11,670 Meters* ^{2}

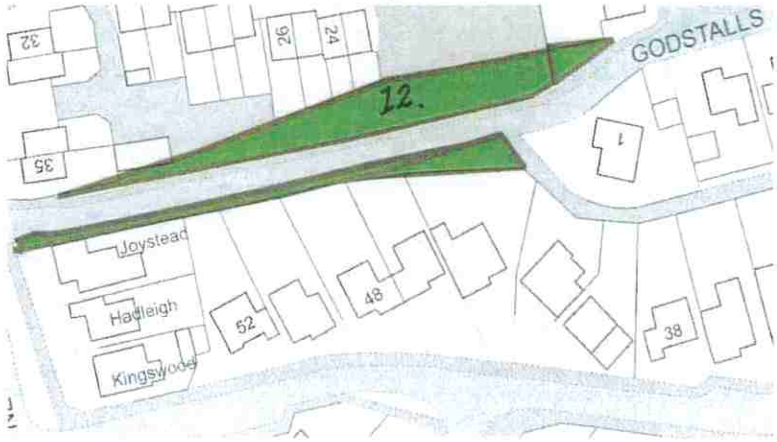
10. Abbey Road Play area – Accessed from Abbey Road, with some play equipment provided. Small wooded area behind (East) of play area.

Registered 31st December 1999
Title Number - ***WSX240564***
Freehold
Ordnance Survey Reference: ***TQ 182/115***
Address – *Abbey Road, Steyning, West Sussex BN44 3SQ*
Area *- 980 Meters* ^{2}

11. Norman's Way – Tarmac area with basketball Hoop, bounded by Norman Way properties.

Area surrounding is owned by WSCC.
Access area owned and maintained by HDC.
Title Number – Details pending
Freehold
Ordnance Survey Reference: ***TQ 179/121***
Address – *Fletchers Croft, Steyning*
West Sussex, BN44 3XZ
Area *– 180 Meters²*

12. Land at Godstall's Lane – Slim strip of land adjacent Godstall's Lane. Small grass strip on west side of road and small clump of trees and shrubs on east side and to the rear of Newham close properties.
Title Number – ***WSX345123***
Freehold
Ordnance Survey Reference: ***TQ 174/109***
Address – *Godstalls Lane, Steyning*
West Sussex, BN44 3XZ
Area *– 320 Meters²*



Further Leasehold Arrangements

High Street Bus Shelter / Public Convenience

Title Number – WSX295555
Leasehold
Ordnance Survey Reference: TQ175/112
Address – ***High Street****, Steyning,*
West Sussex, BN44 3RD
Area *– 40 Meters²*

Register of Common Land (not owned by Steyning Parish Council)

Common Land Registered in 1970*

CL274	Penland Way / A283	Verge
CL275	Castle Lane adjacent Clivedale	
CL278	Land opposite Southdown Terrace	
CL277	Church Street	Verge

*Confirmed by Peter Jupp, WSCC 29/10/14 and 24/07/15.

Item 16.1

Personnel Committee Recommendation

Briefing Note

This item is to agree or otherwise a recommendation from the Personnel Committee regarding an amendment to the STC Email Policy.

This is the *minute* from the 1st May Personnel Committee meeting :-

33.1 To agree potential questions regarding being accountable for your actions as a holder of public office, that could be posed to the SPC member

Members thought that this item should remain on the agenda for next meeting, but that the wording of it should be clearer. It was further noted that email subject titles from certain individuals were often demonstrably derogatory and often towards the Clerk and that this needed to be dealt with.

*Cllr Young **proposed, seconded** by Cllr Lloyd that SPC should be minded to change the subject line of emails if derogatory words or phrases are used and that this should be via a recommendation to Full Council in that the SPC Email Policy be amended in order to deal with this issue. **Agreed***

Please see below for existing SPC Email Policy, with proposed amendments in red. {Plus new Logo}

EMAIL POLICY

1.0 INTRODUCTION

1.1 The Council recognises that email is an important communication system for use during the course of Council business. This policy provides guidelines and procedures to protect users and the Council.

1.2 This policy applies to all employees emailing via Council computers and to all councillors in their correspondence with employees and/or other councillors, members of the public and external organisations.

1.3 The Council owns the email facility, and emails that employees or councillors produce, send, or receive are the property of the Council.

1.4 The Council's email facility should be used for sending STC related communications and associated attachments.

1.5 Council email addresses should not be used to register for non-STC-related online services and/or forums.

2.0 SENDING AND RECEIVING EMAILS

2.1 All internal emails (and other internal communications) are confidential unless the contrary is clearly expressed. This means that they should never be disclosed to third parties unless with the consent of the author and any parties identifiable. If in doubt, councillors and employees should check with the Clerk and the author. Breach of this principle will likely mean a breach of the confidentiality provision in the Code of Conduct in the case of a councillor and may lead to disciplinary action in the case of an employee.

2.2 Emails should be regarded as written documents for the purposes of production, use, retention and disclosure and can be called upon under the Freedom of Information Act 2000, the Environmental Information Regulations, the Data Protection Act and similar legislation. Personal information should be kept and processed in accordance with the principles established in the Data Protection Act 2018.

2.3 Councillors and employees should be aware that the Council as a body always has the right to open any email file stored on the Council's computer system and, while that is delegated to the Clerk on a day to day basis, there may be circumstances in which, after an appropriate resolution of Full Council or court order, other councillors, employees or third parties may be entitled to open and view same, subject to the fair processing provisions of the Data Protection Act (GDPR).

2.4 Councillors and employees should always have in mind whether when sending an email, it is:

- In fulfilment of a process delegated to the councillor or employee by the Council and accordingly is being written on STC's behalf,
- As an individual councillor or employee representing his or her own views as a councillor or employee which may not reflect the views of their colleagues or STC; or
- As a private individual.

In all cases councillors and employees should make this clear to the recipient and should always use their official SPC email address for the first two, and never for the third.

If a councillor wants to raise an issue as an individual with any external body , group or individual, then they should do so as an individual and without giving the impression that they have the backing of council or fellow councillors, and that their concerns or thoughts are nothing more than their own personal opinions. Therefore, they should not sign off as a councillor in this instance.

2.5 Councillors and employees should always have in mind the principles of the Data Protection Act so, for example, generally they should use the BCC field when writing to several recipients who have not consented to their email details being shared and should have in mind that whatever is written is potentially disclosable under the Freedom of Information Act and similar legislation.

2.6 Councillors and employees should have in mind that what is written may be defamatory.

2.7 If in doubt, councillors and employees should consult the Clerk, and always copy him in when writing on behalf of SPC. All communications on behalf of the Council will come from the Clerk, unless delegated otherwise.

3 EMAIL GUIDANCE

NB This Guidance should be used as that – it is not a set of rules and while some principles should never be breached (such as never to threaten), others such as the two emails per day limit are subject to common-sense departures.

All emails and attachments:

3.1.1 Should comply with common codes of courtesy, decency and privacy
3.1.2 Should use appropriate language to avoid unintentional misunderstandings
3.1.3 Should respect the confidentiality of information contained within emails, even if encountered inadvertently
3.1.4 Should not pass off personal views as those representing the Council
3.1.5 Should never be used to criticise, threaten, tell off, be rude to, bully, harass, intimidate or blame any person. If an individual has a problem with someone else's actions, behaviour or performance, they should pick up the telephone and/or arrange to meet in person.
3.1.6 Should meet the criteria of being dignified and respectful, so should be kept in draft format and re-read and then modified if required, before sending
3.1.7 Should not be cc'd to other people, unless agreement is secured from the original sender.
3.1.8 Should only be copied to the Clerk where the email contains important Council related information that the Clerk needs to be aware of
3.1.9 Should not be sent to multiple persons, unless there is a genuine (non-controversial) piece of information to share that is official 'need to know'
3.1.10 Should be limited so that the time it takes to write and read them, should be no longer than half a page of A4, and preferably much shorter and use concise language and bullet points. If the intended communication requires more space than this to set out, a telephone call or one to one meeting should be arranged instead.
3.1.11 Should only be sent during normal business hours and up to 7pm on weekdays and up to 1.00pm on Fridays and not to be sent during weekends and holiday periods.
3.1.12 Should be no more than two per day sent by one individual to another

3.1.13 As per set out in the NALC legal topic note 1, councillors do not have a 'need to know' {See guidance below} on all aspects of council business and cannot claim an automatic right to see all council documentation and information. In other words, councillors are not permitted a fishing expedition in respect of council documentation and information simply because they are councillors.

3.1.14 Councillors and staff should be minded to change the subject line of emails if responding or forwarding that email, if derogatory words or phrases have been used by the originator

3.2 Any person who receives an email from an employee or another councillor that is clearly in breach of any of the above points has the right to ignore the email.

3.3 The Council should ensure that its email policy is properly enforced, and the Clerk is empowered to draw a line under correspondence which breaches the policy. The Clerk can reply to say that the email will not be responded to as it falls outside the policy.

4 SECURITY:

4.1 Check with the sender if there is any doubt regarding the authenticity of a message

4.2 Avoid introducing computer viruses by not opening any attachment unless certain of the authenticity of the sender and if there are concerns the email should be deleted immediately

5 REPORTING AND SANCTIONS:

5.1 If a councillor receives an email from an employee which they believe is contrary to the guidance provided in this policy, it should be reported to the Clerk who will consider use of the Council's formal disciplinary procedure

5.2 If an employee receives an email from another employee which they believe is contrary to the guidance provided in this policy, it should be reported to the Clerk who will consider use of the Council's formal disciplinary procedure

5.3 If an employee receives an email from a councillor which they believe is contrary to the guidance provided in this policy, the employee is entitled to consider use of the Council's grievance policy and/or reporting the issue through the procedures outlined in the councillors' Code of Conduct.

5.4 Serious or persistent breaches of this protocol could amount to breach of the Council's Dignity at Work Policy or the Code of Conduct and will be reported to the HDC monitoring office.

*Guidance Note – **'Need to Know'** explained*

- *If a councillor is a member of a committee, he or she has the right to inspect documents or to obtain information relating to the business of that committee;*
- *If a councillor is not a member of a particular committee, he or she has to demonstrate why sight of the document(s)/or receipt of the information in question is necessary to enable him or her to perform his or her duties as a councillor;*
- *If the councillor's motive for seeing the documents/obtaining information is indirect, improper or ulterior, then the documentation or information should be withheld.*

Adopted by Full Council on the 18th May 2026

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Mr J Fulbrook
Steyning Parish Council
The Steyning Centre
Fletchers Croft
Steyning
West Sussex
BN44 3XZ

11 May 2026

Dear John

Re: Steyning Parish Council
Internal Audit Report for Financial Year Ended 31 March 2026

Executive summary

Following completion of our final internal audit on 11 May 2026, we are pleased to enclose our report for your review and presentation to the council. The audit was conducted in accordance with current professional standards and guidelines, employing a risk-based approach to our testing. While not all transaction were examined, our sample testing, where appropriate, covered the financial year to date.

Some assertions, as noted in this report, were tested at the interim internal audit completed during the financial year and the council should review all internal audit reports for the year before completing the Annual Governance Statement.

The structure of this report aligns with the assertions set out in the Annual Internal Auditor Report section of the published Annual Governance and Accountability Return (AGAR). Each section begins with a summary of the assertion being assessed, followed by details of the testing undertaken, which was guided by the audit plan previously shared with the council. A copy of the audit plan is available upon request. The report concludes with our opinion on whether each assertion has been met as of the date of the audit. **Any recommendations for action are highlighted in bold and summarised in the table at the end of the report.**

Our testing did not identify any procedural errors requiring reporting to the external auditor at this time, nor did we observe any material weaknesses in internal controls that would pose a risk to public funds. In fact, the processes and procures together with own built in compensating controls are robust, strictly followed and in many respects a model of good practice.

We are pleased to report that overall, the systems and procedures currently in place are appropriate and effective. While this report may include recommendations for improvement, these should not be viewed as indicators of significant deficiencies. Rather, they are intended to support the continued development of what is, in our view, a well-managed and robust governance framework.

I have completed the Annual Internal Audit Report page of the AGAR and provided this to the council for onward submission to the External Auditor.

Regulation
The Accounts and Audit Regulations 2015 require smaller authorities, each financial year, to conduct a review of the effectiveness of the system of internal control and prepare an annual governance statement in accordance with proper practices in relation to accounts. In addition to this, a smaller authority is required by Regulation 5(1) of the Accounts and Audit Regulations 2015 to "undertake an effective internal audit to evaluate the effectiveness of its risk management, control and governance processes, taking into account public sector internal auditing standards or guidance."

Internal auditing is an independent, objective assurance activity designed to improve an organisation's operations. It helps an organisation accomplish its objectives by bringing a systematic, disciplined approach to evaluate and improve the effectiveness of risk management, control and governance processes.

The primary purpose of internal audit is to assess and report to the authority on the effectiveness of its financial systems and other internal controls, including the operational procedures that support its activities.

The internal audit function involves testing and evaluating whether the authority's internal control framework is both adequate and functioning effectively. Internal audit reports should be made available to all Members, providing a basis for informed decision making when considering the authority's approval of the Annual Governance Statement.

Independence and competence
Your audit was conducted by Andy Beams of Mulberry Local Authority Services Ltd, who has over 36 years' experience in the financial sector with the last 16 years specialising in local government.

Your auditor is independent from the management of the financial controls and procedures of the council and has no conflicts of interest with the audit client, nor do they provide any management or financial assistance to the client.

Engagement Letter and inherent risk assessment
An engagement letter was previously issued to the council covering the 2025/26 internal audit assignment, which includes the scope and plan of works and fee structure. Copies of this document are available on request from anna@mulberrylas.co.uk

In summary, our work will address each of the internal control objectives as stated on the Annual Internal Audit Report of the AGAR.

It is our opinion that the inherent risk of error or misstatement within the council's financial systems is low. The internal control environment is considered reliable, and as such, substantive testing of individual transactions is not deemed necessary at this stage.

Audit testing will therefore consist of walk-through testing on a selection of sample data, covering the period under review within the current council year. This approach is designed to confirm that key controls are operating effectively throughout the financial period.

Table of Contents

INTRODUCTION

The audit was conducted on site with the Clerk, who also acts as the council's Responsible Financial Officer (RFO). The Clerk had prepared the information advised in advance of the visit, and overall, I have the impression that accounting records are neatly maintained and easily accessible.

Other information was reviewed through discussion with the Clerk and a review of the council website www.steyningpc.gov.uk

UPDATES ON RECOMMENDATIONS FROM INTERIM AUDIT

Internal Audit – Summary of recommendations

Audit Point	Interim Audit Findings	Council comments
B. FINANCIAL REGULATIONS, GOVERNANCE AND PAYMENTS	A Website Accessibility Statement and IT Policy need to be added to the website by 31 March 2026 to meet the requirements of Governance Assertion 10.	Covered in Section O of this report.

A. BOOKS OF ACCOUNT

Internal audit requirement

Appropriate accounting records have been kept properly during the year.

Audit findings

Testing conducted at the interim audit and findings included in the interim audit report.

CONCLUSION

I am satisfied this control objective has been met.

B. FINANCE REGULATIONS, GOVERNANCE AND PAYMENTS

Internal audit requirement

This authority complied with its Finance Regulations, payments were supported by invoices, all expenditure was approved, and VAT was appropriately accounted for.

Audit findings

Testing conducted at the interim audit and findings included in the interim audit report. The recommendations made relating to Governance Assertion 10 compliance are covered in section O of this report.

CONCLUSION
I am satisfied this control objective has been met.

C. RISK MANAGEMENT AND INSURANCE

Internal audit requirement
This authority assessed the significant risks to achieving its objectives and reviewed the adequacy of arrangements to manage these.

Audit findings
Testing conducted at the interim audit and findings included in the interim audit report.

We discussed assertion 8 on the Annual Governance Statement and whether this had any impact on the council.

"We considered whether any litigation, liabilities or commitments, events or transactions, occurring either during or after the year-end, have a financial impact on this authority and, where appropriate, have included them in the accounting statements."

The Clerk confirmed that they were not aware of any event having a financial impact that was not included in the accounting statements.

CONCLUSION
I am satisfied this control objective has been met.

D. BUDGET, PRECEPT AND RESERVES

Internal audit requirement
The precept or rates requirement resulted from an adequate budgetary process; progress against the budget was regularly monitored; and reserves were appropriate.

Audit findings
Testing conducted at the interim audit and findings included in the interim audit report.

Budget
The Clerk/RFO produces regular detailed budget reports from the accounting software. The year-end budget report shows income reported as 115% of budget and expenditure at 122%. There is no evidence to suggest that the budget has not been accurately set and carefully monitored throughout the year.

There is evidence within the minutes of meetings that councillors regularly receive budget reports for review, providing them with sufficient financial information to make informed decisions.

Precept

The council set a precept of £428,170 for 2025/26. With a tax base of 2,572.84, this equates to a band D equivalent of £166.42 (compared to the average in England of £92.92).

I was able to confirm that the precept amount recorded in the accounts is correct, and equals the amount recorded in box 2 of the Accounting Statements.

The Clerk confirmed that the 2026/27 budget and precept were approved by the council at the meeting held on 19 January 2026 (minute ref 91.1.1).

Reserves

The Smaller Authorities Proper Practices Panel (SAPPP) Practitioner's guide provides updated guidance on the appropriate level of general reserves that councils should retain as below:

5.33 The general reserve of an authority comprises its cash flow and contingency funds to cover unexpected inflation, unforeseen events and unusual circumstances.

5.34 The generally accepted recommendation with regard to the appropriate minimum level of a smaller authority's general reserve is that this should be maintained at between three and twelve months of net revenue expenditure.

5.35 The reason for the wide range is to cater for the large variation in activity level between individual authorities. The smaller the authority, the closer the figure may be to 12 months expenditure, the larger the authority, the nearer to 3 months. In practice, any authority with income and expenditure in excess of £200,000 should plan towards 3 months equivalent general reserve.

5.36 In all of this it is important that each authority adopt, as a general reserve policy, the level appropriate to their size, situation, risks and plan their budget so as to ensure that the adopted level is maintained. Consideration of the minimum level of reserves requires not only consideration of level of income and expenditure but also the risks to that income.

5.37 Authorities with significant self-generated income (other than the precept or levy) should take into account situations that may lead to a loss in revenue as well as increased costs and adapt their general reserve accordingly.

At the year-end, the council held circa £246,517 in reserves, split between categories as below:

- Earmarked EMR £100,147
- General Reserves £146,370

I checked the purpose of these earmarked reserves and am satisfied they are all for legitimate future planned projects of the council. The general reserve balance is which is within the recommended range as detailed in the Practitioner's Guide.

CONCLUSION

I am satisfied this control objective has been met.

E. INCOME

Internal audit requirement

Expected income was fully received, based on correct prices, properly recorded and promptly banked; and VAT was appropriately accounted for.

Audit findings

Testing conducted at the interim audit and findings included in the interim audit report.

CONCLUSION

I am satisfied this control objective has been met.

F. CASH

Internal audit requirement

Cash payments were properly supported by receipts; all cash expenditure was approved and VAT appropriately accounted for.

Audit findings

Testing conducted at the interim audit and findings included in the interim audit report.

CONCLUSION

I am satisfied this control objective has been met.

G. PAYROLL

Internal audit requirement

Salaries to employees and allowances to members were paid in accordance with the authority's approvals, and PAYE and NI requirements were properly applied.

Audit findings

Testing conducted at the interim audit and findings included in the interim audit report.

I reviewed the figure included in box 4 (staff costs) on the Accounting Statements and was able to confirm from the accounting software that in accordance with the guidance contained in the Smaller Authorities Proper Practices Panel (SAPPP) Practitioner's guide this includes only salary payments, HMRC payments and pension contributions.

CONCLUSION
I am satisfied this control objective has been met.

H. ASSETS AND INVESTMENTS

Internal audit requirement
Asset and investments registers were complete and accurate and properly maintained.

Audit findings
Testing conducted at the interim audit and findings included in the interim audit report.

I confirmed the asset register total matches that included in box 9 (total fixed assets plus long term investments and assets) on the Accounting Statements and was able to trace the changes to the previous year's total against the asset register.

The council has no long-term investments.

The council has no borrowing through the PWLB.

CONCLUSION
I am satisfied this control objective has been met.

I. BANK AND CASH

Internal audit requirement
Periodic bank account reconciliations were properly carried out during the year.

Audit findings
Testing conducted at the interim audit and findings included in the interim audit report.

I reviewed the year-end bank reconciliation for all accounts and was able to confirm the balances on 31 March 2026 to the bank statements and found no errors. I was able to confirm the total bank balances to the figure included in the Accountings Statements on the AGAR.

CONCLUSION
I am satisfied this control objective has been met.

J. YEAR END ACCOUNTS

Internal audit requirement

Accounting statements prepared during the year were prepared on the correct accounting basis (receipts and payments or income and expenditure), supported by an adequate audit trail from underlying records and, where appropriate, debtors and creditors were properly recorded.

Audit findings

The council is reminded that at its meeting to sign the Annual Governance and Accountability Return (AGAR), it should complete the steps in the following order:

- **Review and consider the Annual Internal Audit Report**
- **Complete Section 1 – Annual Governance Statement**
- **Complete Section 2 – Accounting Statements**

Section 1 – Annual Governance Statement

Based on the internal audit findings, I recommend using the table below as the basis for that discussion.

	Annual Governance Statement	*'Yes', means that this authority*	Suggested response based on evidence
1	We have put in place arrangements for effective financial management during the year, and for the preparation of the accounting statements.	*prepared its accounting statements in accordance with the Accounts and Audit Regulations.*	**YES** – accounts follow latest Accounts and Audit Regulations and practitioners guide recommendations.
2	We maintained an adequate system of internal control including measures designed to prevent and detect fraud and corruption and reviewed its effectiveness.	*made proper arrangements and accepted responsibility for safeguarding the public money and resources in its charge.*	**YES** – there is regular reporting of financial transactions and accounting summaries, offering the opportunity for scrutiny.
3	We have assured ourselves that there are no matters of actual or potential non-compliance with laws, regulations and Proper Practices that could have a significant financial effect on the ability of this authority to conduct its business or manage its finances.	*has only done what it has the legal power to do and has complied with Proper Practices in doing so.*	**YES** – the Clerk advises the council in respect of its legal powers.
4	We provided proper opportunity during the year for the exercise of electors' rights in accordance with the requirements of the Accounts and Audit Regulations.	*during the year gave all persons interested the opportunity to inspect and ask questions about this authority's accounts.*	**YES** – the requirements and timescales for 202/25 year-end were followed.

5	We carried out an assessment of the risks facing this authority and took appropriate steps to manage those risks, including the introduction of internal controls and/or external insurance cover where required.	*considered and documented the financial and other risks it faces and dealt with them properly.*	**YES** – the council has a risk management scheme and appropriate external insurance.
6	We maintained throughout the year an adequate and effective system of internal audit of the accounting records and control systems.	*arranged for a competent person, independent of the financial controls and procedures, to give an objective view on whether internal controls meet the needs of this smaller authority.*	**YES** – the council has appointed an independent and competent internal auditor.
7	We took appropriate action on all matters raised in reports from internal and external audit.	*responded to matters brought to its attention by internal and external audit.*	**YES** – matters raised in internal and external audit reports have been addressed.
8	We considered whether any litigation, liabilities or commitments, events or transactions, occurring either during or after the year-end, have a financial impact on this authority and. Where appropriate, have included them in the accounting statements.	*disclosed everything it should have about its business activity during the year including events taking place after the year end if relevant.*	**YES** – no matters were raised during the internal audit visits.
9	Trust funds including charitable – In our capacity as the sole managing trustee we discharged our accountability responsibilities for the fund(s)/asset(s), including financial reporting and, if required, independent examination or audit.	*has met all its responsibilities where, as a body corporate, it is a sole managing trustee of a local trust or trusts.*	**N/A** – the council has no trusts
10	We have put in place arrangements for the effective IT and data management in accordance with proper practices during the year under review.	*has made suitable arrangements for its IT and data management and has complied with proper practices in doing so*	**YES** – the council has met the requirements of Governance Assertion 10

Section 2 – Accounting Statements

AGAR box number		2024/25	2025/26	Internal Auditor notes
1	Balances brought forward	261,829	288,179	Agrees to 2024/25 carry forward (box 7)
2	Precept or rates and levies	404,325	428,170	Figure confirmed to central precept record
3	Total other receipts	157,522	272,288	Agrees to underlying accounting records
4	Staff costs	193,299	343,632	Agrees to underlying accounting records. Includes only expenditure allowed as staff costs (see section G)
5	Loan interest/capital repayments	0	0	Council has no borrowing
6	All other payments	342,198	398,488	Agrees to underlying accounting records
7	Balances carried forward	288,179	246,517	Casts correctly and agrees to balance sheet
8	Total value of cash and short- term investments	349,372	264,281	Agrees to bank reconciliation for all accounts
9	Total fixed assets plus long- term investments and assets	2,515,129	2,515,141	Matches asset register total and changes from previous year have been traced
10	Total borrowings	0,	0	Council has no borrowing
11	Do the figures in the accounting statements above exclude any trust transactions	Yes	Yes	Yes – trust transactions are excluded from the stated figures

Audit findings

The year-end accounts have been correctly prepared on an income and expenditure basis with the box 7 and 8 reconciliation completed. This shows total year-end debtors of £2,621 and total year-end creditors of £20,384, with a full breakdown of the individual debtors and creditors provided.

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CONCLUSION

I am satisfied this control objective has been met.

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K. LIMITED ASSURANCE REVIEW

Internal audit requirement

If the authority certified itself as exempt from a limited assurance review in the previous year, it met the exemption criteria and correctly declared itself exempt.

CONCLUSION

The council did not certify itself exempt from a limited assurance review in the previous year and the testing for this internal control objective is not applicable.

L: PUBLICATION OF INFORMATION

Internal audit requirement

The authority publishes information on a free to access website/webpage, up to date at the time of the internal audit in accordance with relevant legislation

Audit findings

All councils are required to follow The Accounts and Audit Regulations which include the following requirements:

13(1) An authority must publish (which must include publication on that authority's website)

(a) the Statement of Accounts together with any certificate or opinion entered by the local auditor in accordance with section 20(2) of the Act; and
(b) the Annual Governance Statement approved in accordance with regulation 6(3)

13(2) Where documents are published under paragraph (1), the authority must

(a) keep copies of those documents for purchase by any person on payment of a reasonable sum; and
(b) ensure that those documents remain available for public access for a period of not less than five years beginning with the date on which those documents were first published in accordance with that paragraph.

I was able to confirm that pages 4 (Annual Governance Statement), 5 (Accounting Statements) and 6 (External Auditor's Report and Certificate) of the AGARs are available for review on the council website for the previous five financial years.

Confirm that the council is compliant with the relevant transparency code

For councils with a turnover over £25,000, it is recommended best practice to follow the Local Government Transparency Code 2015, but not a statutory requirement and therefore not subject to verification during the internal audit.

CONCLUSION
I am satisfied this control objective has been met.

M: EXERCISE OF PUBLIC RIGHTS - INSPECTION OF ACCOUNTS

Internal audit requirement
The authority, during the previous year, correctly provided for the exercise of public rights as required by the Accounts and Audit Regulations.

Audit findings

Inspection – key dates	2024/25 Actual	2025/26 Proposed
Date AGAR signed by council	19 May 2025	18 May 2026
Date inspection notice issued	2 June 2025	2 June 2026
Inspection period begins	3 June 2025	3 June 2026
Inspection period ends	14 July 2025	14 July 2026
Correct length (30 working days)	Yes	Yes
Common period included (first 10 working days of July)	Yes	Yes

I am satisfied the requirements of this control objective were met for 2024/25, and assertion 4 on the Annual Governance Statement can therefore be signed yes by the council.

I reviewed the proposed dates for the Exercise of Public Rights for the 2025/26 AGAR and confirm that these are in accordance with the requirements of the Accounts and Audit Regulations.

CONCLUSION
I am satisfied this control objective has been met.

N: PUBLICATION REQUIREMENTS

Internal audit requirement

The authority complied with the publication requirements for the prior year AGAR.

Under the Accounts and Audit Regulations 2015, authorities must publish the following information on the authority website / webpage.

Before 1 July 2025 authorities must publish:
• Notice of the period for the exercise of public rights and a declaration that the accounting statements are as yet unaudited
• Section 1 - Annual Governance Statement 2024/25, approved and signed, page 4
• Section 2 - Accounting Statements 2024/25, approved and signed, page 5

Not later than 30 September 2025 authorities must publish:
•Notice of conclusion of audit
•Section 3 - External Auditor Report and Certificate
•Sections 1 and 2 of AGAR including any amendments as a result of the limited assurance review.
It is recommended as best practice, to avoid any potential confusion by local electors and interested parties, that you also publish the Annual Internal Audit Report, page 3.

Audit findings

Testing conducted at the interim audit and findings included in the interim audit report.

CONCLUSION

I am satisfied this control objective has been met.

O. DIGITAL AND DATA COMPLIANCE

Internal audit requirement

The authority has complied with laws, regulations and proper practices relating to digital and data compliance.

Audit findings

The Smaller Authorities Proper Practices Panel (SAPPP) Practitioner's Guide (March 2025) contains guidance on the new Governance Assertion included on the 2025/26 AGAR which relates to this internal control objective.

Website

I was able to confirm that the council website contains a Privacy Notice and a Website Accessibility Statement. **The Website Accessibility Statement references partial compliance with the Web Content Accessibility Guidelines (WCAG) 2.1 AA and should be updated to reflect the current WCAG 2.2 AA standard.**

The council has an IT Policy in place which was last reviewed and approved by the council at the meeting held on 16 February 2026.

Email management and GDPR

It was noted the council has a generic email address on a domain owned by the council and has established common email addresses for all councillors. This is recommended because it gives a natural segregation between work and personal lives, making it clear beyond doubt in what capacity a councillor is acting. In addition to this it gives control to the council, adds a degree of professionalism and in the event of a FOI request limits access to personal computers.

I recommend the council ensures that a data audit is completed during 2026/27 to comply with GDPR regulations. This may be included within the Governance Assertion 10 testing for next year.

CONCLUSION

I am satisfied this control objective has been met.

P. TRUSTEESHIP

Internal audit requirement

Trust funds (including charitable) – The council met its responsibilities as a trustee.

CONCLUSION

The council has no trusts and the testing for this internal control objective is not applicable.

Achievement of control assertions at final internal audit date

Based on the tests conducted during the interim audit, our conclusions on the achievement of the internal control objectives to date are summarised in the table below.

	INTERNAL CONTROL OBJECTIVE	YES	NO	NOT COVERED
A	Appropriate accounting records have been properly kept throughout the financial year	✓		
B	This authority complied with its Finance Regulations, payments were supported by invoices, all expenditure was approved, and VAT was appropriately accounted for	✓		
C	This authority assesses the significant risks to achieving its objectives and reviewed the adequacy of arrangements to manage these	✓		
D	The precept or rates requirement resulted from an adequate budgetary process; progress against the budget was regularly monitored; and reserves were appropriate.	✓		
E	Expected income was fully received, based on correct prices, properly recorded and promptly banked; and VAT was appropriately accounted for	✓		
F	Cash payments were properly supported by receipts, all cash expenditure was approved, and VAT appropriately accounted for	✓		
G	Salaries to employees and allowances to members were paid in accordance with the authority's approvals, and PAYE and NI requirements were properly applied.	✓		
H	Asset and investments registers were complete and accurate and properly maintained.	✓		
I	Periodic bank account reconciliations were properly carried out during the year.	✓		
J	Accounting statements prepared during the year were prepared on the correct accounting basis (receipts and payments or income and expenditure), supported by an adequate audit trail from underlying records and, where appropriate, debtors and creditors were properly recorded.	✓		
K	If the authority certified itself as exempt from a limited assurance review in the previous year, it met the exemption criteria and correctly declared itself exempt.			✓
L	The authority publishes information on a free to access website/webpage up to date at the time of the internal audit in accordance with the relevant legislation.	✓		
M	The authority, during the previous year correctly provided for the period for the exercise of public rights as required by the Accounts and Audit Regulations.	✓		
N	The authority complied with the publication requirements for prior year AGAR.	✓		
O	The authority has complied with laws, regulations and proper practices relating to digital and data compliance	✓		
P	Trust funds (including charitable) – The council met its responsibilities as a trustee.			✓

Should you have any queries please contact me directly on andy@mulberrylas.co.uk

Yours sincerely

Andy Beams
Director, Mulberry Local Authority Services Ltd

Internal Audit – Summary of recommendations

Audit Point	Internal Audit Findings	Council comments
O. DIGITAL AND DATA COMPLIANCE	The Website Accessibility Statement references partial compliance with the Web Content Accessibility Guidelines (WCAG) 2.1 AA and should be updated to reflect the current WCAG 2.2 AA standard. I recommend the council ensures that a data audit is completed during 2026/27 to comply with GDPR regulations. This may be included within the Governance Assertion 10 testing for next year.	

Annual Internal Audit Report 2025/26

STEYNING PARISH COUNCIL

www.Steyningpc.gov.uk

During the financial year ended 31 March 2026, this authority's internal auditor acting independently and on the basis of an assessment of risk, carried out a selective assessment of compliance with the relevant procedures and controls in operation and obtained appropriate evidence from the authority.

The internal audit for 2025/26 has been carried out in accordance with this authority's needs and planned coverage. On the basis of the findings in the areas examined, the internal audit conclusions are summarised in this table. Set out below are the objectives of internal control and alongside are the internal audit conclusions on whether, in all significant respects, the control objectives were being achieved throughout the financial year to a standard adequate to meet the needs of this authority.

Internal control objective	Yes	No*	Not covered**
A. Appropriate accounting records have been properly kept throughout the financial year.	✓		
B. This authority complied with its financial regulations, payments were supported by invoices, all expenditure was approved and VAT was appropriately accounted for.	✓		
C. This authority assessed the significant risks to achieving its objectives and reviewed the adequacy of arrangements to manage these.	✓		
D. The precept or rates requirement resulted from an adequate budgetary process; progress against the budget was regularly monitored; and reserves were appropriate.	✓		
E. Expected income was fully received, based on correct prices, properly recorded and promptly banked; and VAT was appropriately accounted for.	✓		
F. Cash payments were properly supported by receipts, all cash expenditure was approved and VAT appropriately accounted for.	✓		
G. Salaries to employees and allowances to members were paid in accordance with this authority's approvals, and PAYE and NI requirements were properly applied.	✓		
H. Asset and investments registers were complete and accurate and properly maintained.	✓		
I. Periodic bank account reconciliations were properly carried out during the year.	✓		
J. Accounting statements prepared during the year were prepared on the correct accounting basis (receipts and payments or income and expenditure), agreed to the cash book, supported by an adequate audit trail from underlying records and where appropriate debtors and creditors were properly recorded.	✓		
K. If the authority certified itself as exempt from a limited assurance review in 2024/25, it met the exemption criteria and correctly declared itself exempt. *(If the authority had a limited assurance review of its 2024/25 AGAR tick "not covered")*			✓
L. The authority published the required information on a website/webpage up to date at the time of the internal audit in accordance with the relevant legislation.	✓		
M. In the year covered by this AGAR, the authority correctly provided for a period for the exercise of public rights as required by the Accounts and Audit Regulations *(during the 2025/26 AGAR period, were public rights in relation to the 2024-25 AGAR evidenced by a notice on the website and/or authority approved minutes confirming the dates set).*	✓		
N. The authority has complied with the publication requirements for 2024/25 AGAR *(see AGAR Page 1 Guidance Notes).*	✓		
O. The authority has complied with laws, regulations & proper practices relating to digital and data compliance.	✓		
	Yes	**No**	**Not applicable**
P. (For local councils only) Trust funds (including charitable) – The council met its responsibilities as a trustee.			✓

For any other risk areas identified by this authority adequate controls existed (list any other risk areas on separate sheets if needed).

Date(s) internal audit undertaken: 30/10/2025 11/05/2026

Name of person who carried out the internal audit: Andy Beams - Mulberry LAS Ltd

Signature of person who carried out the internal audit: ABeams

Date: 11/05/2026

***If the response is 'no' please state the implications and action being taken to address any weakness in control identified (add separate sheets if needed).**

Note: If the response is 'not covered' please state when the most recent internal audit work was done in this area and when it is next planned; or, if coverage is not required, the annual internal audit report **must explain why not (add separate sheets if needed).

Section 1 – Annual Governance Statement 2025/26

We acknowledge as the members of:

STEYNING PARISH COUNCIL

our responsibility for ensuring that there is a sound system of internal control, including arrangements for the preparation of the Accounting Statements. We confirm, to the best of our knowledge and belief, with respect to the Accounting Statements for the year ended 31 March 2026, that:

	Agreed Yes	Agreed No*	N/A	*'Yes' means that this authority:*
1. We have put in place arrangements for effective financial management during the year, and for the preparation of the accounting statements.	✓			*prepared its accounting statements in accordance with the Accounts and Audit Regulations.*
2. We maintained an adequate system of internal control including measures designed to prevent and detect fraud and corruption and reviewed its effectiveness.	✓			*made proper arrangements and accepted responsibility for safeguarding the public money and resources in its charge.*
3. We have assured ourselves that there are no matters of actual or potential non-compliance with laws, regulations and Proper Practices that could have a significant financial effect on the ability of this authority to conduct its business or manage its finances.	✓			*has only done what it has the legal power to do and has complied with Proper Practices in doing so.*
4. We provided proper opportunity during the year for the exercise of electors' rights in accordance with the requirements of the Accounts and Audit Regulations.	✓			*during the year gave all persons interested the opportunity to inspect and ask questions about this authority's accounts.*
5. We carried out an assessment of the risks facing this authority and took appropriate steps to manage those risks, including the introduction of internal controls and/or external insurance cover where required.	✓			*considered and documented the financial and other risks it faces and dealt with them properly.*
6. We maintained throughout the year an adequate and effective system of internal audit of the accounting records and control systems.	✓			*arranged for a competent person, independent of the financial controls and procedures, to give an objective view on whether internal controls meet the needs of this smaller authority.*
7. We took appropriate action on all matters raised in reports from internal and external audit.	✓			*responded to matters brought to its attention by internal and external audit.*
8. We considered whether any litigation, liabilities or commitments, events or transactions, occurring either during or after the year-end, have a financial impact on this authority and, where appropriate, have included them in the accounting statements.	✓			*disclosed everything it should have about its business activity during the year including events taking place after the year end if relevant.*
9. (For local councils only) Trust funds including charitable. In our capacity as the sole managing trustee we discharged our accountability responsibilities for the fund(s)/assets, including financial reporting and, if required, independent examination or audit.	Yes:	No:	N/A: ✓	*has met all of its responsibilities where, as a body corporate, it is a sole managing trustee of a local trust or trusts.*
10. We have put in place arrangements for the effective IT and data management in accordance with proper practices during the year under review.	✓			*has made suitable arrangements for its IT and data management and has complied with proper practices in doing so.*

***Please provide explanations to the external auditor on a separate sheet for each 'No' response and describe how the authority will address the weaknesses identified. These sheets must be published with the Annual Governance Statement.**

This Annual Governance Statement was approved at a meeting of the authority on:

18/05/2026

and recorded as minute reference:

FULL/26/.........

Signed by the Chair and Clerk of the meeting where approval was given:

Chair

Clerk

www.Steyningpc.gov.uk

Section 2 – Accounting Statements 2025/26 for

STEYNING PARISH COUNCIL

	Year ending		Notes and guidance
	31 March 2025 £	31 March 2026 £	*Please round all figures to nearest £1. Do not leave any boxes blank and report £0 or Nil balances. All figures **must** agree to underlying financial records.*
1. Balances brought forward	261,829	288,179	*Total balances and reserves at the beginning of the year as recorded in the financial records. Value **must** agree to Box 7 of previous year.*
2. (+) Precept or Rates and Levies	404,325	428,170	*Total amount of precept (or for IDBs rates and levies) received or receivable in the year. Exclude any grants received.*
3. (+) Total other receipts	157,522	272,288	*Total income or receipts as recorded in the cashbook less the precept or rates/levies received (line 2). Include any grants received.*
4. (-) Staff costs	193,299	343,532	*Total expenditure or payments made to and on behalf of all employees. Include gross salaries and wages, employers NI contributions, employers pension contributions, gratuities and severance payments.*
5. (-) Loan interest/capital repayments	0	0	*Total expenditure or payments of capital and interest made during the year on the authority's borrowings (if any).*
6. (-) All other payments	342,198	398,488	*Total expenditure or payments as recorded in the cash-book less staff costs (line 4) and loan interest/capital repayments (line 5).*
7. (=) Balances carried forward	288,179	246,517	*Total balances and reserves at the end of the year. **must** equal (1+2+3) - (4+5+6).*

8. Total value of cash and short term investments	349,372	264,281	*The sum of all current and deposit bank accounts, cash holdings and short term investments held as at 31 March – **To agree with bank reconciliation.***
9. Total fixed assets plus long term investments and assets	2,515,129	2,515,141	*The value of all the property the authority owns – it is made up of all its fixed assets and long term investments as at 31 March.*
10. Total borrowings	0	0	*The outstanding capital balance as at 31 March of all loans from third parties (including PWLB).*

For Local Councils Only	Yes	No	
11 Do the figures in the accounting statements above exclude any trust transactions?	✓		*For guidance refer to the Practitioners' Guide sections 2.31 to 2.33.*

I certify that for the year ended 31 March 2026 the Accounting Statements in this Annual Governance and Accountability Return have been prepared on either a receipts and payments or income and expenditure basis following the guidance in Governance and Accountability for Smaller Authorities – a Practitioners' Guide to Proper Practices and present fairly the financial position of this authority.

Signed by Responsible Financial Officer before being presented to the authority for approval.

SIGNATURE REQUIRED

Date 11/05/2026

I confirm that these Accounting Statements were approved by this authority on this date:

18/05/2026

as recorded in minute reference:

FULL/26/.........

Signed by Chair of the meeting where the Accounting Statements were approved

SIGNATURE REQUIRED

Smaller authority name: **Steyning Parish Council**

NOTICE OF PUBLIC RIGHTS AND PUBLICATION OF UNAUDITED ANNUAL GOVERNANCE & ACCOUNTABILITY RETURN

ACCOUNTS FOR THE YEAR ENDED 31 MARCH 2026

Local Audit and Accountability Act 2014 Sections 26 and 27
The Accounts and Audit Regulations 2015 (SI 2015/234)

NOTICE	NOTES
1. Date of announcement **Tuesday 2 June 2026** _(a)	(a) Insert date of placing of the notice which must be not less than 1 day before the date in (c) below
2. Each year the smaller authority's Annual Governance and Accountability Return (AGAR) needs to be reviewed by an external auditor appointed by Smaller Authorities' Audit Appointments Ltd. The unaudited AGAR has been published with this notice. As it has yet to be reviewed by the appointed auditor, it is subject to change as a result of that review. **Any person interested has the right to inspect and make copies of the accounting records for the financial year to which the audit relates and all books, deeds, contracts, bills, vouchers, receipts and other documents relating to those records must be made available for inspection by any person interested. For the year ended 31 March 2026, these documents will be available on reasonable notice by application to:**	
(b) **John Fullbrook – The Clerk and Responsible Finance Officer** **Steyning Parish Council** **Fletchers Croft, BN44 3XZ**	(b) Insert name, position and address/telephone number/ email address, as appropriate, of the Clerk or other person to which any person may apply to inspect the accounts
commencing on (c) **Wednesday 3 June 2026**	(c) Insert date, which must be at least 1 day after the date of announcement in (a) above and extends for a single period of 30 working days (inclusive) ending on the date appointed in (d) below
and ending on (d) **Tuesday 14 July 2026** **[the 30th working day after (c) above]**	(d) The inspection period between (c) and (d) must also include the first 10 working days of July.
3. Local government electors and their representatives also have: • The opportunity to question the appointed auditor about the accounting records; and • The right to make an objection which concerns a matter in respect of which the appointed auditor could either make a public interest report or apply to the court for a declaration that an item of account is unlawful. Written notice of an objection must first be given to the auditor and a copy sent to the smaller authority. The appointed auditor can be contacted at the address in paragraph 4 below for this purpose between the above dates only.	
4. The smaller authority's AGAR is subject to review by the appointed auditor under the provisions of the Local Audit and Accountability Act 2014, the Accounts and Audit Regulations 2015 and the NAO's Code of Audit Practice 2015. The appointed auditor is: MOORE **Moore (Ref AP/HD)** **Rutland House** **Minerva Business Park** **Lynch Wood** **Peterborough** **PE2 6PZ**	
5. This announcement is made by (e) John Fullbrook, Steyning Parish Council Clerk	(e) Insert name and position of person placing the notice – this person must be the responsible financial officer for the smaller authority

Item 16.6

Personnel Committee Recommendation II

Briefing Note

This item is to agree or otherwise a recommendation from the Personnel Committee regarding the change of title for the existing SPC Clerking role. Please note that the Job description is remaining the same.

This is the *minute* from the 1st May Personnel Committee meeting :-

34.4 To consider a proposed change to the job title of Parish Clerk.

The Chair of the Council put forward this item for discussion feeling a change of title in the first instance was necessary due to the Council shortly becoming a Town Council, but that also it would be more appropriate as residents, and third parties would all better understand what the role involved if the title was changed to *C.E.O* rather than *Clerk,* which was frankly understood by very few, and that this would likely benefit the whole Council. It was also noted that the job description should otherwise remain the same.

Cllr Norcross **proposed, seconded** by Cllr Bell that this committee recommends to Full Council that the Clerk's Job Title changes to Chief Executive Officer. **Agreed**

It might be best to record the title as per noted below, as it is easier in some respects when required to refer to oneself as the Clerk, or as the Responsible Finance Officer, less so as the Health and Safety Officer, or as the SPC Data Controller, or as the Community Centre Manager, etc, etc.

Chief Executive Officer (Clerk and Responsible Finance Officer) for Steyning Town Council

Local Govt' Clerk Definition - A Local Government Clerk (often a Town, Parish, or Municipal Clerk) is the chief administrative officer, secretary, and legal advisor to a local council, ensuring legal compliance and implementing council decisions. They act as the "proper officer," handling records, managing meetings, and guiding public policy, crucial to functioning governance

Please see below for the notes presented as part of the Personnel Committee discussions for the 1st May

Change of Job Title for SPC Clerk
Briefing Note

NALC guidance, often in conjunction with the Society of Local Council Clerks (SLCC), recognizes the Clerk as the Chief Officer, increasingly adopting a CEO-style role in larger councils. This role demands strategic leadership, management, and professional qualifications to handle increased responsibilities, with salaries for larger councils averaging £78,200.

SLCC | Society of Local Council Clerks +1

Key NALC/Sector Guidance on Senior Officers (Clerks/CEOs):

- **Role Definition:** While officially the Clerk, in larger councils, this role acts as the CEO, managing staff and implementing council strategy.
- **Recruitment and Pay:** NALC advises attracting experienced leaders with competitive salaries equivalent to district council staff for larger councils.
- **Professionalism:** Councils are urged to support Chief Officers through membership with SLCC and NALC to access training, resources, and legal guidance.
- **Governance:** The officer ensures compliance, acting as the Proper Officer, but does not override decisions made by the council.
- **Staffing Changes:** NALC provides guidance for restructuring when councils take on new services, emphasizing, along with WorkNest, the need for proper HR procedures, especially if changing roles to "CEO".
- **Legal Standing:** The Clerk/CEO acts under the authority of the Council as a body, not as an autonomous manager.

National Association of Local Councils +4

For specific, up-to-date guidance, NALC publishes advice notes and templates for member councils

NALC Guidance on the "CEO" Role

While the **Local Government Act 1972** formally identifies the position as the "Proper Officer" or "Clerk," NALC and the **Society of Local Council Clerks (SLCC)** recognise the evolution of this role into a "Chief Officer" or "Chief Executive" capacity for larger authorities.

SLCC | Society of Local Council Clerks +1

- **Professional Leadership**: NALC supports the view that for substantial town councils, the lead officer must bring proven strategic management, communication, and leadership skills comparable to those of district council chief executives.
- **Status and Respect**: NALC guidance, often found in publications like the Local Councils Explained digital edition, emphasizes that the Clerk/CEO is the council's principal advisor and manager, not merely an administrative assistant.
- **Recruitment and Salary**: For larger councils, NALC and SLCC suggest that "Competitive pay is essential" to attract top talent. Salaries for chief officers in these larger local councils currently average approximately **£78,200**, with some of the largest town councils offering even higher figures.
- **Staffing Structures**: Recent NALC advice notes highlight that as councils take on more devolved responsibilities, their staffing structures—led by the CEO—must be reviewed to ensure legal compliance and effective service delivery.

From the NALC latest edition of Local Councils explained

''The proper officer is regarded as the most senior member of staff and is commonly known as the clerk to the Council. Some councils apply a different title for the post of the proper officer. These include "executive officer", "chief executive", "head of support services", and "executive manager". Often a local council will appoint a deputy or assistant proper officer. Many local councils separate the job of the proper officer and the RFO. However, many smaller local councils will combine these two roles and employ one person as the council's proper officer and RFO".

Most recent Job Applications (in April) on NALC Website include the following:

Chief Executive Officer – Congleton Town Council

Chief Executive Officer – Almondsbury Parish Council

Deputy Executive Officer – Sandhurst Town Council

Chief Executive Officer – Otley Town Council

Chief Executive Officer – Thornbury Town Council

Horsham District Council

Community Governance Review 2026

We welcome your feedback on Parish boundaries and Parish councillor arrangements.

As part of this review, you can suggest:
- changing the boundaries of existing parishes
- creating new parishes
- merging parishes
- grouping parishes to work together
- changing the name of a parish council
- changing how many councillors in the parish
- sub dividing parishes into smaller parish wards
- changing the parish ward boundaries in parishes that are already subdivided into parish wards

This is a consultation and all comments will be considered.

Draft recommendations will be prepared on the basis of the responses received. These draft recommendations will be subject to further consultation.

Data Protection

Your data will be held in accordance with the Data Protection Act 2018.
Responses are anonymous. Please do not include any personally identifiable information in this survey, apart from your email address at the end if you choose to leave it.

Further information about how we handle your data can be found in our Privacy Statement

Your Parish

Which parish would you like to provide a response for?

- ◯ Amberley Parish
- ◯ Ashington Parish
- ◯ Ashurst Parish
- ◯ Billingshurst Parish
- ◯ Bramber Parish
- ◯ Broadbridge Heath Parish
- ◯ Coldwaltham Parish
- ◯ Colgate Parish
- ◯ Cowfold Parish
- ◯ Henfield Parish
- ◯ Horsham Town
- ◯ Itchingfield Parish
- ◯ Lower Beeding Parish
- ◯ North Horsham Parish
- ◯ Nuthurst Parish
- ◯ Parham Parish
- ◯ Pulborough Parish
- ◯ Rudgwick Parish
- ◯ Rusper Parish
- ◯ Shermanbury Parish
- ◯ Shipley Parish
- ◯ Slinfold Parish
- ◯ Southwater Parish
- ◯ Steyning Parish
- ◯ Storrington and Sullington Parish
- ◯ Thakeham Parish
- ◯ Upper Beeding Parish
- ◯ Warnham Parish
- ◯ Washington Parish
- ◯ West Chiltington Parish
- ◯ West Grinstead Parish
- ◯ Wiston Parish
- ◯ Woodmancote Parish

About you

What is your interest in the parish you have selected?
(select all that apply)

- ☐ I work in the parish
- ☐ I live in the parish
- ☐ I represent an organisation based or operating in the parish
- ☐ Other (please specify)

Please specify your other interest in the parish you have selected

If you represent an organisation, please provide the name of the organisation:

Please provide the first 5 characters of your postcode to enable us to map responses

Parish boundaries

Do you believe that the current parish boundary reflects your community's identity and interests?
Please consider whether the current boundary includes the places your community uses and identifies with, and whether it still makes sense given local development or changes in how the community functions

- ○ Yes
- ○ No
- ○ Unsure

If no, what changes do you think should be considered?
(select all that apply)

- ☐ Create a new parish, with different boundaries to the current parish (e.g. splitting the parish into more than one parish)
- ☐ Alter the existing boundary of the parish
- ☐ Merge with one or more parishes that border the parish
- ☐ Abolish the parish
- ☐ Other (please specify)

Please explain your suggested change further, and the reasons.
Please provide information about the boundaries of any new parish, any suggested altered boundary or which parish it should be merged with if you have selected one of these options (maximum 100 words)

Parish name

Do you believe that the name of the parish is appropriate?
The name of the parish should reflect the area it represents, and should identify the parish’s geographical area and identity

- ◯ Yes
- ◯ No
- ◯ Unsure

If no, please provide an alternative suggestion for the name
(maximum 100 characters)

Parish councillors

How do you feel about the current number of parish councillors for your area?
This is an opportunity to review the number of councillors, and consider whether to reduce or increase the number of councillors to better reflect the local population. The number of councillors for each parish is available on the

- ◯ Too many
- ◯ About right
- ◯ Too few

Parish wards

If the Parish is not divided into wards, should it be?
Parish wards may be used where a parish area is large, and/or has diverse populations. Warding a parish can enable better representation of the varied communities in the parish, as each ward would have its own councillors

- ◯ Yes
- ◯ No
- ◯ Unsure

If yes, how should the parish be warded?
Please make a suggestion as to the boundaries of the proposed wards (i.e. which areas of the parish should be split?). Please provide detail on the suggested number of wards and the ward names.
(maximum 100 words)

If the parish is already divided into wards, do you believe that the current ward boundaries reflect your community's identity and interests?
Parish wards may be used where a parish area is large, and/or has diverse populations. Warding a parish can enable better representation of the varied communities in the parish, as each ward would have its own councillors.

- ◯ Yes
- ◯ No
- ◯ Unsure

If no, how should the parish be warded?
Please make a suggestion as to the boundaries of the proposed wards (i.e. which areas of the parish should be split?). Please provide detail on the suggested number of wards and the ward names.
(maximum 100 words)

Grouping of parishes

Do you think the parish should be grouped with one or more neighbouring parishes under a common parish council?

In many rural areas, small parishes are joined together and share one parish council. This allows each parish to stay separate and keep its own parish meeting. This kind of grouping is different from dividing a parish into wards.

Each parish in the group chooses a certain number of councillors to sit on the shared parish council. Every parish must have at least one councillor on the shared council. Some parishes in the group may also be divided into wards, and each ward then elects its share of councillors as part of the parish's total number on the shared council.

- ◯ Yes
- ◯ No
- ◯ Unsure

If yes, which parishes and why?
(maximum 100 words)

Further involvement

If you would like us to contact you when the draft recommendations are published, along with a link to the consultation taking place this summer, please provide your email address:

Submit your responses

Please return your completed form by 22 June:

- by scanning and emailing to cgr@horsham.gov.uk
- by handing in to Reception at Albery House, Springfield Road, Horsham
- by post to Electoral Services, Horsham District Council, Albery House, Springfield Road, Horsham, RH12 2GB.

Thank you for taking the time to complete this survey, your views are important to us.

Government launches second consultation on local government reorganisation in Sussex

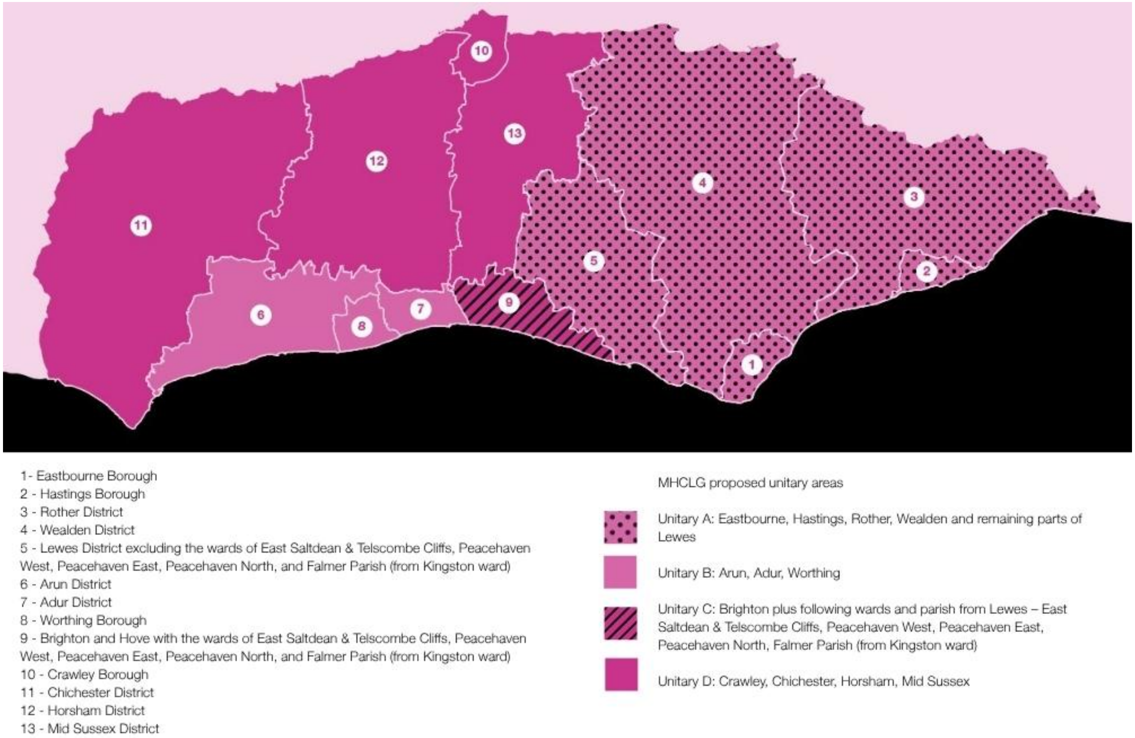
The government has today launched a second phase of consultation on the options for local government reorganisation across Sussex. All councils in West Sussex are working together to ensure our staff, members, residents, businesses, partners and communities are aware of the opportunity to have their say on the modified plans that government have suggested for our area.

What this consultation covers

The second, technical consultation asks for comments on two potential modifications on the proposals already submitted by Sussex local authorities (West Sussex councils recommended a single unitary authority for the whole of West Sussex or two unitary authorities – one comprising of Arun District, Adur District, Chichester District and Worthing Borough areas, and one comprising of Crawley Borough, Horsham District and Mid Sussex District areas). A further consultation for East Sussex and Brighton would see boundary changes. The key elements of the new government proposals are as follows:

- **West Sussex proposals**
  - Chichester District would form a unitary authority with Crawley Borough, Horsham District and Mid Sussex District areas. The population would be around 566,000
  - Arun District, Adur District and Worthing Borough areas would form a second West Sussex unitary authority. The population would be around 349,000

- **East Sussex and Brighton and Hove proposals**
  - specific wards from Lewes District (East Saltdean and Telscombe Cliffs, Peacehaven West, Peacehaven East, Peacehaven North) and Falmer Parish (from Kingston ward) would transfer into a unitary authority with Brighton and Hove. The population would be around 308,000
  - a remaining East Sussex unitary would comprise Eastbourne Borough, Hastings Borough, Rother District, Wealden District and the rest of Lewes District. The population would be around 537,000



Expected timeline

A decision is expected in the summer after the consultation period closes and the Government considers all representations including recommendations from councils and responses from both consultations. The overall timescale for reorganisation remains, with elections to the new shadow unitary authorities expected in 2027 preparing for the new authorities to formally launch in 2028.

- consultation opens: 12 May
- consultation closes: 11:59pm on 15 June 2026
- government decision expected: Summer 2026
- elections to new shadow authorities: Expected 2027
- new authorities launch: Expected 2028

As with the last consultation it is designed to gather comment from statutory consultees but equally welcomes comments from all individuals, stakeholders and interested parties and we have been asked to share the consultation and enable responses. As with the last government consultation we are arranging paper copies in A4 and large print at our office receptions as well as offering them in libraries. These are being printed and distributed as soon as we have the consultation information from government so may take a week to be available at the libraries.

For your residents, the core external message as we proceed through local government reorganisation remains one of reassurance - we will continue to collaborate closely behind the scenes to ensure a smooth transition. All eight existing councils will continue to operate and deliver services right up to the handover in 2028 when the new unitary councils will take responsibility for delivering services. Our external messaging will include the reminder for residents seeking council information or services to continue to contact their local councils in the usual way.

You can find shared materials, background information and evidence on the reorganisation proposals at: www.shapingwestsussex.org.uk as well as more information for teams on our intranet pages https://staff.horsham.gov.uk/local-government-reorganisation-lgr.

Full consultation details and a link to submit a response is available at:
https://www.gov.uk/government/consultations/modified-proposals-for-local-government-reorganisation-in-west-sussex/modified-proposals-for-local-government-reorganisation-in-west-sussex