

RUSTINGTON PARISH COUNCIL

MINUTES: of the Monthly Meeting held on 27 March 2023

PRESENT: Councillors Mrs A Cooper (Chairman), Mrs C Broomfield, M Broomfield, J Ceiriog-Hughes, M Clayden, A Cooper, Mrs P Gregory, R Grevett, Mrs S Partridge, M Revell, D Rogers and G Tyler

In attendance: Mrs C Ward (Clerk of the Council) and Ms R Costan (Deputy Clerk of the Council)

61/23 APOLOGIES FOR ABSENCE

Apologies for absence were received from Councillors Bennett (Personal), Street (Work Commitment) and Warren (Indisposition). These apologies were accepted by the Council.

62/23 DECLARATIONS OF INTEREST

Councillor Rogers declared a prejudicial interest in Minute 70/23 (Minute 24/23 of the Finance and General Purposes Committee Meeting held on 27 March 2023 refers). He remained in the Meeting during consideration of this item, but took no part in the vote thereon.

63/23 MINUTES

The Minutes of the Monthly Meeting held on 27 February 2023 were signed by the Chairman as a correct record.

64/23 SUSSEX POLICE

(a) Inspector Neil Durkan

The Clerk reported that she had previously circulated an email received from Inspector Neil Durkan, advising that he would be leaving the Arun NPT at the end of April, as a part of the Op Unify re-shuffle, and moving to Horsham NPT. She said that he would be replaced by Inspector Damian Merrifield.

The Council NOTED this information and recorded its thanks and appreciation to Inspector Durkan for his unceasing support throughout his time in post.

(b) Matters Arising

The Clerk reported that apart from an unsuccessful attempted break in to the compound leading to the plant equipment store and side and rear of the Youth Centre building, there was nothing of any significance to report since the last Meeting in respect of the Woodlands Recreation Ground. The Police had responded swiftly to a 999 call but, unfortunately, on arrival at the site the perpetrators had fled. This was, however, still an open investigation.

She then advised that the Anti-Social Behaviour Officer at the Arun District Council had also provided information of recent issues of concern in connection with youths accessing the out-buildings within the grounds of the Rustington Convalescent Home, and a spate of 'knocking on doors and fleeing' that was taking place all across the district.

The Council NOTED this information.

The Clerk again reminded Members that the Arun District Weekly Bulletins were still being circulated via email as soon as they were received.

65/23 DISTRICT COUNCILLORS

The Clerk reported that apologies for absence had been received from Councillors Gunner and Tilbrook.

The Chairman, in her capacity as a District Councillor, advised the Council that the 2023/2024 Budget had been agreed at a Special Meeting of the Council on 9 March 2023, which would result in a 2.99% increase.

The Council NOTED this information.

66/23 COUNTY COUNCILLORS

The Chairman, in her capacity as a County Councillor for Rustington reported as follows:-

- *A259 Bognor Regis to Littlehampton Corridor Enhancement Scheme - Still some virtual events being held for anyone wishing to have their say*
- *Electric Vehicle Charging Bays Proposals - County Council taking a new approach by consulting with County and District Councillors with their initial proposals - Current closing date for response by the aforementioned Councillors - 5 April - Number of dedicated spaces being reduced so no more than two spaces at any location.*

The Council NOTED this information.

67/23 CLERK'S REPORT

(a) 2022 Community Carol Concert

The Clerk reported the receipt of an email from The Melodians, expressing its thanks and appreciation in respect of the recent donation of £100.00 awarded in recognition of their participation in the 2022 Community Carol Concert.

The Council was pleased to NOTE this information.

(b) 2022 Community Carol Concert - Retiring Collection

The Clerk reported the receipt of a letters of thanks and appreciation from Turning Tides, in respect of the donation of £381.69, representing the Retiring Collection from the 2022 Community Carol Concert.

The Council was pleased to NOTE this information.

68/23 CHAIRMAN'S REPORT

The Chairman said that she had nothing to report at the present time.

69/23 PLANNING COMMITTEE

The Council NOTED the Report of the Planning Committee Meeting held on 20 February 2023.

(Prior to consideration of the following item Councillor Rogers had declared a prejudicial interest, as Miss E Rogers was his granddaughter - Minute 24/23 refers)

70/23 FINANCE AND GENERAL PURPOSES COMMITTEE

The Council received the Report of the Finance and General Purposes Committee Meeting held on 27 March 2023. (Verbal Report from the Chairman of the Committee).

The Council RESOLVED that all of the Recommendations contained in the Report of the Finance and General Purposes Committee Meeting held on 27 February 2023 be APPROVED.

**71/23 ANNUAL REVIEW OF THE EFFECTIVENESS OF THE COUNCIL'S INTERNAL
AUDIT ARRANGEMENTS**

The Council considered a Report from the Clerk of the Council regarding the Annual Review of the Effectiveness of the Council's Internal Audit Arrangements for the preceding year.

The Clerk referred to the Recommendations made by the appointed Internal Auditor in his 2022/2023 Interim Audit Report, and said that the Finance Manager/RFO was in the process of actioning all of the recommendations. She said that a full Report would be being placed before the Finance and General Purposes Committee for information at its next Meeting.

The Council RESOLVED that the Report be APPROVED as the Annual Review of the Effectiveness of the Council's Internal Audit Arrangements for the preceding year. A copy of the Report is attached and forms a part of these Minutes.

72/23 2023/2024 BUDGET

The Council NOTED the receipt of the Council's approved Budget for 2023/2024, copies of which had been previously circulated to all Members.

73/23 ANNUAL RISK MANAGEMENT

The Council reviewed the updated Risk Assessment Procedures as presented, and subsequently RESOLVED unanimously to take no action in respect of any further amendments to the procedures. A copy of these procedures is attached and forms a part of these Minutes.

74/23 HEALTH & SAFETY POLICY

The Council reviewed the updated Council's Health and Safety Policy as presented, and RESOLVED to take no action in respect of any further amendments to this Policy at the present time. A copy of the Policy is attached and forms a part of these Minutes.

**75/23 FREEDOM OF INFORMATION ACT 2000 - MODEL PUBLICATION
SCHEME 2009**

The Council reviewed the Council's updated Freedom of Information Act 2000 - Model Publication Scheme as presented, and RESOLVED to take no further action in respect of any other amendments at the present time. A copy of the Model Publication Scheme is attached and forms a part of these Minutes.

76/23 HOMEWORKING POLICY

The Council reviewed the Homeworking Policy as presented, and RESOLVED to take no action in respect of any amendments to this Policy at the present time. A copy of the Policy is attached and forms a part of these Minutes.

77/23 EQUAL OPPORTUNITIES POLICY

The Council reviewed the Equal Opportunities Policy as presented, and RESOLVED to take no action in respect of any amendments to this Policy at the present time. A copy of the Policy is attached and forms a part of these Minutes.

78/23 NUMBER 12 BUS SERVICE

(a) Statistics - February 2023

The Council NOTED the Number 12 Bus Service Statistics for February 2023.

The Clerk then referred to Minute 48/23(b) and said that she had previously circulated an email received from Mr C Chatfield, Managing Director, in which he had, once again, conveyed his apologies regarding the appearance of the bus that had been being used recently for the No. 12 Service.

He had advised that an improvement should be seen within the next few weeks but the 'School Bus' sign had already been removed and it was anticipated that a new destination screen would be fitted very soon. He also confirmed that once the new timetable was introduced (hopefully from 15 May) the plan was to have two dedicated single deck buses on the route, and arrangements could then be made to have specific adverts on these buses encouraging passengers to visit Rustington and East Preston.

He had concluded his email by stating that as a gesture of goodwill, he would be willing to take 10% off of the next month's invoice, as he was also unhappy with the standard of service that had been being provided.

Following a further discussion, the Council RESOLVED to accept Mr Chatfield's offer of a 10% discount on the next invoice.

**79/23 CORONATION OF KING CHARLES III - CORONATION CONCERT -
SUNDAY 7 MAY 2023**

The Clerk referred to Minute 49/23 and advised that the Conductor of the Band had advised that the programme would feature music from around Britain, pieces that the King had said that he particularly enjoyed, and pieces with other connections to the King, plus some of the 'proms' style pieces and finish with the National Anthem.

She then reminded the Council that the tickets would be available from the Village Information Centre with effect from 1 April 2023. She said that cold refreshments would be supplied and it was anticipated that there would again be a Lucky Programme Draw.

The Council was pleased to NOTE this information.

80/23 PROVISION OF CHANGING PLACES TOILET - THE STREET

The Clerk referred to Minute 11/23(a) (Leisure and Amenities Committee Meeting - 20 February 2023 refers) and said that the Senior Surveyor at the Arun District Council had recently advised that the works were expected to take about 10 weeks to complete, and it was hoped that these would be completed by September 2023.

She said that the Contractors would need to have some space in the Church Car Park for welfare facilities, plus work and material space, and it was hoped that the Church would agree to this. She advised that discussions were currently ongoing in this regard.

The Council NOTED this information.

**81/23 THE WOODLANDS CENTRE - PROPOSED MAJOR REDESIGN AND
REFURBISHMENT PROJECT**

The Clerk referred to Minute 50/23 and reported that a Meeting with Scott Taylor and the Quantity Surveyor and Members of the Working Party had taken place on 16 March 2023.

She said that the main purpose of the Meeting was to receive and consider a Presentation from Scott Taylor in respect of cost saving ideas and strategies to get the Project cost down to the proposed figure put forward by the Council.

She said that the Working Party had hoped to be able to Report back to the Council with its recommendations at this Meeting, but this had not been possible. However, the Working Party would be meeting again in the very near future and a detailed Report would be placed before the Council at its next Meeting.

The Council NOTED this information.

82/23 RUSTINGTON NEIGHBOURHOOD PLAN

The Clerk said that she had previously circulated an email received from Neil Homer, O'Neill Homer.

She said that Councillor Warren had made the following observations:-

With regard to the email received from Neil Homer I would like to suggest we do not use his services at the present time. Our Neighbourhood Plan, which covers the period 2014-2029, was last reviewed some four years ago where it was decided there was no pressing need to pursue updating. I believe that to be still the case with Policy 2 on Housing Design used extensively and Policy 6 on Local Employment used occasionally. Our comments on Planning Applications continue to be accepted by the District Authority. With the Local Plan still paused, relevant bills currently being considered in Parliament, land supply figures liable to alteration and housing numbers not confirmed it would seem sensible to delay furthering the topic at present.

Following a brief discussion, the Council RESOLVED to take no further action in this regard at the present time.

83/23 ARUN DISTRICT COUNCIL - UK SHARED PROSPERITY FUNDS

The Clerk said that she had previously circulated the District Council's News Release in this regard.

She then referred particularly to the following text in the News Release in respect of Rustington:-

Rustington will benefit from a new MUGA (Multi-use Games area) and high-quality outdoor fitness equipment, as well as new cycling facilities.

The Council was pleased to NOTE the News Release and especially the good news in respect of the Council's Bid to the UK Shared Prosperity Fund via the District Council.

84/23 WEST SUSSEX COUNTY COUNCIL - WSCC DRAFT POST-16 TRANSPORT POLICY STATEMENT 2023-2024 CONSULTATION

The Council considered an email received from the Post 16 Transport Team, once again requesting views about the Post-16 Transport Policy Statement. The consultation aimed to make sure the information in the Policy Statement was up to date and complete.

The Statement set out the help that was available through the Council, Schools, Colleges and Transport Operators for young people of sixth-form age and those who were 19+ with an Education Health and Care Plan in place to get to school or college.

The Clerk said that the consultation period was up to 16 April 2023, and all responses would be considered before the Policy Statement was published at the end of May.

Following a brief discussion, the Council RESOLVED that the Clerk/Deputy Clerk should be AUTHORISED to respond to this Consultation on behalf of the Council, if they felt it was appropriate.

The Clerk said that she had previously circulated an email received from Joy Dennis, Cabinet Member for Highways and Transport, together with associated documentation in this regard.

The Council NOTED this information.

MILLFIELD OVERSTRAND ESTATE - PARKING

The Chairman advised the Council that she had recently been contacted by a member of the Board of Directors of the Millfield Overstrand Estates Management Committee as follows:-

You may remember that I contacted you regarding the above back in December and before we (Board of Directors) put in an official application, we would like to hear your comments on the attached. I have put together a short document outlining the estate and possible actions to prevent the current problem and would appreciate your comments and indeed if you think we would have a case?

Background - The estate consists of one hundred and seventeen properties with private grounds and footpaths. Both Overstrand Avenue and Millfield Close are council roads and have 58 private parking bays (maintained by the lessees). Both Overstrand Avenue and Millfield Close are cul-de-sacs (Sign posted 'No Through Road')

There are also a few Council owned footpaths (tarmac) and grass verges adjacent to the road. The grass verges are mowed at the same time as the estate lawns. All the grounds and the four (concrete) footpaths are maintained by the lessees. The estate has signs stating, "No Public Access to the Beach".

Members of the public persistently park inconsiderately (sometimes illegally) in Overstrand Avenue, partly on the road and across the grass verge and then use the private grounds/footpaths to access the beach. Residents have in the past approached people, only to be verbally abused or completely ignored! This parking is obstructing residents exiting the private parking bays and causing a nuisance.

The estate is in the process of producing more signs, hopefully to help educate the public and prevent this happening.

Therefore, Millfield Overstrand are asking for advice on what can be done regarding the inconsiderate/illegal parking problem i.e:-

- 1. Residents Only Parking Scheme - **PREFERRED SCHEME!***
- 2. Can the Council provide a parking attendant service to 'ticket' vehicles and the appropriate signage, advising that action will be taken?*
- 3. Can the Council provide 'No Waiting Signs'?*
- 4. Can the Council provide time limited parking?*
- 5. Other Council Ideas?*

She said that she would like to gauge what, if any, thoughts the Council might have regarding the suggestions made above.

Following a brief discussion, the Council RESOLVED to take no further action in this regard at the present time.

The Council, pursuant to Section 100 of the Local Government Act 1972, RESOLVED that Members of the Public and accredited representatives of the Press be excluded from the Meeting because of the confidential nature of the next item of business to be transacted.

The Clerk said that she had previously circulated a Quotation received from Event Power Engineering.

The Deputy Clerk said that a Meeting had been held with representatives from Store Property Investments Limited and the Rustington Chamber of Trade and Commerce to consider the way forward in respect of the Christmas Lighting Partnership and the Quotation received, together with all other associated costs, e.g., Bay Tree Lighting, Stand-Alone Christmas Trees, Electric Supply Costs and Column Testing Costs.

She said that due to a lack of funds and dropping membership numbers, the Chamber had indicated that it would no longer be able to contribute financially to the Scheme and, therefore, would have to withdraw from the Partnership, although the remaining Section 106 Funding could be used to meet the costs for the 2023 Christmas Lighting Scheme.

Following a detailed discussion, the Council RESOLVED that the following Quotation to extend the Christmas Lighting Contract with Event Power Engineering, which covered the majority cost of the Scheme, for a further five-year period should be ACCEPTED, with the Deputy Clerk and Clerk being AUTHORISED to agree the final Specification, which could include some changes to the 2022 Scheme:-

Full Scheme Supply and Installation Annually Based on 5 Years £16,000.00.

It was further AGREED that:-

- (a) In an effort to reduce the overall cost of the Scheme, there should be no 'stand-alone' Christmas Trees (e.g., outside of The Lamb Public House and the Georgi Finn) funded by the new Partnership, which in 2022 amounted to an additional cost of in the region of £2,000.00 over and above the Contract sum
- (b) The Council should commit to £10,000.00 per annum towards the total cost of the Christmas Lighting Scheme in the Village with effect from 1 April 2024 for a four-year period.

The Council NOTED the following Documents and Publications previously circulated for Members' information:-

- (a) Action in rural Sussex - March 2023 AirS Newsletter
- (b) Campaign to Protect Rural England - Campaigns Update - March 2023
- (c) Campaign to Protect Rural England - Use rooftops for solar panels and save our land for food and wildlife
- (d) Campaign to Protect Rural England - We needed more from the Spring Budget
- (e) Campaign to Protect Rural England - The hidden homelessness crisis
- (f) Campaign to Protect Rural England - Deposit return: a quick update
- (g) Carers Support West Sussex - Latest news from Carers Support West Sussex
- (h) DLP Planning Limited - DLP Bytes - March 2023
- (i) East Preston Parish Council News - 2 March 2023, 10 March 2023 and 16 March 2023
- (j) Hidden Disabilities Sunflower - The Invisible Issue - March 2023
- (k) National Association of Local Councils - Chief Executive's Bulletin - 3 March 2023, 12 March 2023, 17 March 2023 and 24 March 2023
- (l) National Association of Local Councils - NALC Events - 7 March 2023 and 9 March 2023

- (m) National Association of Local Councils - NALC Newsletter - 8 March 2023, 15 March 2023 and 22 March 2023
- (n) RHS - Growing confidence through art and science
- (o) St Barnabas House - Mrs Ward, make it a Night to Remember this June
- (p) Transport for the South East - Newsletter - March 2023
- (q) West Sussex County Council - A259 Major Improvement Scheme - Progress Update - 11 March 2023
- (r) West Sussex County Council - News Releases - 1 March 2023, 2 March 2023 x3, 3 March 2023, 7 March 2023 x2, 10 March 2023 x2, 13 March 2023 x2, 14 March 2023, 15 March 2023, 16 March 2023 x2, 17 March 2023 x2, 20 March 2023, 22 March 2023, 23 March 2023 and 24 March 2023 x3
- (s) West Sussex County Council - Residents' eNewsletter - 23 March 2023
- (t) West Sussex Emergency Management - West Sussex County Council: Met Office Level 3 Cold Weather Alert
- (u) West Sussex Fire & Rescue Service - News Releases - 3 March 2023 x2

90/23

DOCUMENTS AND PUBLICATIONS RECEIVED

- (a) DLP Planning Limited Briefing Note - Active Travel England

There being no further business the Meeting concluded at 8.10 pm.

Chairman:

Date:

There were no questions received either preceding, or at, the Meeting for consideration during the Public Question Time, held prior to the commencement of the formal proceedings.

RUSTINGTON PARISH COUNCIL - 27 MARCH 2023

Annual Review of the Effectiveness of the Council's Internal Audit Arrangements

1. Members are reminded that an Annual Review of the effectiveness of the Council's Internal Audit has to be undertaken as part of the external Audit. Confirmation that such a Review has taken place is required as part of the Annual Report - Annual Governance Statement.
2. The role of the Internal Auditor is to provide an independent and objective opinion on the Council's risk management, control and governance by evaluating their effectiveness.
3. The Council are reminded that, on completion of the Final Internal Audit for the year ended 31 March 2022, its Internal Auditor, R S Hall & Co, stood down and, April Skies Accounting were appointed to undertake the role of the Council's Internal Auditor for a twelve month period commencing on 1 April 2023.
4. The Council's Internal Auditors have, again, over the past twelve months, carried out the end of year Audit for the financial year 2021/2022, and also the Interim Audit for the current financial year, 2022/2023 (copies attached). A copy of April Skies Accounting Terms of Reference and Audit Plan used for the Internal Audit is also attached for Members' information.
5. The end of year Audit, for the 2022/2023 financial year, will be carried out on 30 May 2023, following the completion of the Council's final accounts. The Internal Auditor's Report in this regard will be placed before the Council for consideration as soon as practicably possible following its receipt.
5. In accordance with the above, I would suggest that the Council, once again, considers the aforementioned Reports to review the effectiveness of the Council's Internal Audit procedure over the past twelve months.
6. From these Reports, it is evident that the appointed Internal Auditor provides a most professional service, comprehensively recording and documenting all of the Council's accounting systems and internal controls. Any issues requiring review, improvement or updating, have been highlighted and, wherever possible addressed, with the aim of improving the systems currently in place.
7. The Internal Auditor's findings can also reassure the Council that its financial controls are all in order and continue to be independently monitored on a regular basis.
8. I would, therefore, recommend that the Council, once it has considered the attached documents, approves this Report as its Annual Review of the Internal Audit's effectiveness over the past twelve months.

21 March 2023

Clerk of the Council

7 May 2022

RUSTINGTON PARISH COUNCIL

FINAL INTERNAL AUDIT REPORT

FOR THE YEAR ENDED 31 MARCH 2022

INTRODUCTION

An internal audit of the Parish Council's financial records for the year 2021/2022 has recently been completed. The audit included all financial transactions for the period 1 April 2021 to 31 March 2022 inclusive.

The audit was undertaken in compliance with the requirements of the Accounts and Audit (England) Regulations 2015, and in accordance with the agreed and accepted Audit Plan.

Regulation 3 of the Accounts and Audit (England) Regulations states that the Parish Council must ensure that it has a sound system of internal control which—

- (a) facilitates the effective exercise of its functions and the achievement of its aims and objectives;
- (b) ensures that the financial and operational management of the authority is effective; and
- (c) includes effective arrangements for the management of risk

Regulation 5 of the Accounts and Audit (England) Regulations states that the Parish Council must undertake an effective internal audit to evaluate the effectiveness of its risk management, control and governance processes, and any officer or member of the Parish Council, if required to do so for the purposes of the internal audit shall -

- (a) make available such documents and records; and
- (b) supply such information and explanations;

The objective of the internal audit is to determine whether the accounting arrangements, procedural controls, records, and documentary evidence are adequate to ensure the accurate and timely recording of financial transactions, so as to comply with all relevant legislation and best practice.

SCOPE

The audit included

- 1) examination of the income and expenditure account for the year
- 2) detailed inspection of the trial balance and nominal ledger
- 3) review of bank statements
- 4) review of agendas and minutes of meetings,
- 5) review of budgets and confirmation that variances between actual and budgeted expenditure are regularly analysed and explained,
- 6) review of fixed asset register and insurance policy,
- 7) review of payroll records,
- 8) confirmation that bank reconciliations and reports are prepared regularly and reviewed at frequent meetings of the Parish Council.

The Council accounts are prepared using EXCEL spreadsheets, and the bookkeeping is done on SAGE.

FINDINGS

- 1) I carried out a detailed review of the fixed asset register and compared it with the insurance policy. The asset register had been appropriately updated in the year for all additions, disposals and replacement assets, except that the accounts included an accrual for a new trailer for £3,253, which was not included on the fixed asset register
- 2) The annual accounts accurately record the Council's position as at 31 March 2022
- 3) The annual return agrees to the accounts, and all variances in comparison to the prior year have been adequately explained. However the prior year columns had not been completed correctly (these have now been amended)
- 4) Monies paid and received during the year have been accurately recorded and reconciled to the bank and cash balances.
- 5) Council governance, internal controls and budgeting procedures were found to be excellent as a result of the direction and management of the Clerk and Finance Manager.

SUMMARY AND OPINION

One of the functions of internal audit is to give assurance to members of the council that the financial systems are operating correctly, and can be relied upon.

In connection with my examination, and having regard to the items reported herewith, no matter has come to my attention that gives me reasonable cause to believe in any *material* respect that the regulatory requirements have not been complied with. Finance Manager (inc RFO) is extremely proficient and thorough, good systems and internal controls are in place to ensure the correct documentation and recording of income and expenditure.

The accounting arrangements, procedural controls, records and documentary evidence are considered to be exemplary, and accurately record the Council's financial position.



.....
RACHEL HALL (ACA)
7 May 2022

Caroline Harris

Rustington Parish Council

16 November 2022

Dear Caroline

Rustington Parish Council

Interim Internal Audit 2022-23

Following the interim audit completed on 15 November, I attach my report for consideration by the Council. This was the first of two audits I intend to carry out to support my opinion on the 22-23 Annual Governance and Accountability Return (AGAR). I covered the following at this visit:

- Review of opening balances and reporting of 21-22 audit opinion
- Follow up previous recommendations
- Testing of expenditure first 6 months of financial year
- Testing of income – first 6 months of financial year
- Risk management and insurance
- Budget monitoring reports
- Arrangements for inspection of accounts
- Bank reconciliations.

I am pleased to report that the Council has successfully maintained a satisfactory system of financial control. I have recommendations for improvement, these are at Appendix A.

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. The internal audit reports should therefore be made available to all members to support and inform them when they are considering the Authority's approval of the annual governance statement. I am required by Section 4 of the Annual Governance and Accountability Return (AGAR) to review controls in place at the Council against predefined control assertions. These control assertions are set out below, together with the results of testing carried out at the interim audit.

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A: Books of Account

Interim Audit

The Council uses the Sage 50 system for accounting and payroll. I have tested the brought forward balances on Sage at 1.4.22 against the audited prior year annual return and can confirm these have been brought forward correctly. Box 7 on the audited accounts for 21-22 was £477,220. This agrees to the period 0 balance sheet on Sage.

Reconciliations tested were up to date at the time of the audit. The cashbook was also up to date, and referencing on Sage was sufficiently detailed to enable me to locate supporting documentation.

I have confirmed that the Council's VAT returns are up to date, with the most recent claim for the 2 months to 30 September 2022, submitted to HMRC on 4.11.22. I checked that balances in the return could be agreed to schedules produced by the accounting system. The VAT claim was submitted using Sage digital submission process. The VAT claimed was £9,872, this agreed to the VAT control account at 30.9.22.

The Council is currently working through proposals to carry out refurbishment of the Woodland Centre. Given the level of expenditure involved, it would be sensible to obtain VAT advice from a sector specialist to ensure the Council makes correct VAT decisions .

I checked access controls to the Council's accounting system. Three officers have access to Sage. I was able to confirm that all access levels were appropriate for the officers concerned.

I have no recommendations in this area.

B: Financial Regulations & Payments

Interim Audit

Financial Regulations and Standing Orders were reviewed at Governance and Audit Committee in February 2022. The Rustington documents are based on NALC templates. (Minute 40/22 for standing orders, Minute 41/22 for Financial Regulations.)

The Council has a well ordered process for making payments to suppliers. Invoices are sent into the office, these are collated with purchase orders and goods received notes by the finance team. Invoices are checked by the RFO, then loaded on to Sage and coded to an appropriate nominal ledger code. Twice a month a payment batch report is prepared on Sage. This is sent to the Chairman / Vice Chairman and Clerk for approval to pay. Once the batch is approved, the payments are loaded on to the Council's bank account by the RFO, who also approves the payments at bank. Payments are then reported to Council meetings and this is minuted.

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I selected a sample of 10 transactions from the cashbook for the period April to September 2022. I was able to confirm for all transactions that:

- Transactions could be agreed back to invoice
- Clerk and once councillor had certified the invoice as ready for payment
- Invoice included in a payment run document, authorised by Clerk plus one councillor, in line with financial regulation requirements
- VAT accounting correct
- Expenditure appropriate for the Council
- Payment set up a and authorised at bank by RFO.

Whilst this is a robust system for making payments and demonstrates that the Council is following financial regulations, I have 2 recommendations to raise:

- The Council is overdependent on the RFO for the payment process, and there is insufficient separation of duties for some transactions (RFO raises PO, checks transaction and authorises payment at bank.) I recommend that the Council sets up a system of dual authorisation for payments on the Council's bank accounts. This should require 2 signatories on all transactions, one to set up the payment, one to authorise.
- There are insufficient numbers of bank signatories with working online authorisation access to the bank accounts. The Council could have issues paying staff and suppliers if RFO and Clerk were not available. Additional signatories should be set up with access to authorise payments.

However, I am satisfied that the Council is meeting this control objective.

C: Risk Management & Insurance

Interim Audit

I will review the risk assessment at my year end audit. I remind the Council to ensure that the risk assessment is discussed at a meeting of Full Council before 31 March and that this review is minuted.

The Council is in year three of a 3-year deal insured with Hiscox, arranged by Gallgahers on a standard local government policy. I have seen the insurance policy; insurance was in date "continuous cover from 1.10.22 until the policy is cancelled". Fidelity insurance is set at £250K. Whilst this may appear too low, given the cash and investment holdings at the Council, the Council has obtained guidance from the brokers confirming that this level of insurance is sufficient. This is because much of the Council's cash is held in difficult to access deposit accounts. Asset cover appeared consistent with the asset register. 6 buildings are insured, at an insurance value of £3.7m

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I confirmed that back up of data on the Sage system is taken around twice a week . This is stored in the Y drive on the Council network. The IT provider has confirmed that this drive is included in the Council's data back-up routines.

I confirmed that the most recent internal audit report was properly considered by Councillors at the May meeting of Finance and General Purposes Committee and an appropriate minute recorded (minute 37/22).

D. Budget, Precept & Reserves

Interim Audit

The Council is the process of preparing the budgets for 23-24. The RFO has shared the budget timetable with me. The draft budgets are being reviewed by committees at present. Precept and Budget is due to be approved at Full Council on 19 December. There is a back up meeting at the end of January 2023. All precepting authority deadlines should therefore be met.

I have confirmed that regular budget monitoring reports are to monthly Full Council. I have reviewed files and confirmed that reports were issued for October / May and August 2022, so I am satisfied budget monitoring is occurring regularly. I reviewed the report for the year to 17 October 2022. The report is comprehensive, giving analysis by nominal centre on a departmental basis. I reviewed the budget, there were no material overspends at this point. I have one recommendation. There is scope for a short narrative report to be added to the budget monitoring booklet to set out key messages and explain any significant variances.

I will review Council reserves at my year end audit.

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6 Uplands Road. Farnham GU9 8BP

E: Income

Interim Audit

The Council obtains income from a number of sources beyond the annual precept:

- Room Hire and Functions - Woodland Centre / Youth Centre / Samuel Wickens Centre
- Sponsored flower beds
- Allotments
- Sports pitches

I confirmed fees and charges for 22-23 had been properly approved at meetings of the Council

- Sports Pitches – Leisure and Amenities November 2021
- Woodlands Centre - Leisure and Amenities November 2021

Invoices for hall bookings are generated from the Council's diary system. I tested a sample of bookings in the diary, through to invoicing, for the month of September. For all diary bookings tested, I confirmed the event occurred, and checked that the customer had been invoiced

- At the correct rate, as approved by Council
- For the correct amount of time , per the booking

I was able to confirm correct invoicing for all transactions audited.

The room booking process is manual, and there is no link to the Council's accounting system. The Council may wish to consider investing in a room booking system which interfaces into Sage Accounts.

I reviewed the Council's debtors ledger. At the time of my audit debts outstanding were £4.5K. There were no debts older than September 2022.

The Council still offers the option of payment by cheque or cash. This should be removed from standard terms and conditions, and only offered in exceptional circumstances. Management of cash and cheques is time consuming and will become more difficult as bank closures continue. Payments from customers should be made by card or bank transfer wherever possible. The Council should also consider moving allotment rental collection to an annual direct debit.

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April Skies

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The Council has received a number of payments relating to a Halloween event held in the village, it is understood these were for stalls at the event. However, no fees were agreed by the Council in advance of the event, and the RFO was not consulted to ensure VAT was included in charges. Going forward, fees for all one off events must be agreed in advance, following consultation with the RFO.

F. Petty Cash

Petty cash held at the office , museum and information centre. Books and receipts are brought into the office every month. I will review a petty cash count at my final audit.

G. Payroll

Payroll will be tested at the final audit

H. Assets and Investments

Year end audit

I: Bank Reconciliations

Interim Audit

Reconciliations for all bank accounts are carried out regularly and in accordance with regulations. This is clearly evidenced in the Council's bank reconciliation file. The October 2022 bank reconciliation was tested in detail. I confirmed the following.

- The face of the bank statements had been signed off by the reviewing councillor, Councillor Warren
- All balances on the bank reconciliation were agreed back to bank statements / cashbooks
- Arithmetic checked for accuracy
- I confirmed that the bank reconciliations are reported to councillors in the monthly accounts for payment report.

J. Year-end accounts

Year-end test

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L: Exercise of Public Rights - Inspection of Accounts

Inspection periods for 2021-22 accounts were set as follows

Inspection - Key date	2021-22 Actual
Accounts approved at Full Council	23 May
Date Inspection Notice Issued and how published	5 June - website
Inspection period begins	6 June
Inspection period ends	15 July
Correct length	Yes 30 working days

All regulatory requirements were met.

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 any relevant transparency code requirements

As a larger Council, with income / expenditure in excess of £200K, RPC is required to follow the 2015 Transparency Code. I was able to confirm that data required by the Code could be located at various pages on the Council website, and specifically confirmed that the following information was up to date

- Grants awarded – Details of grants awarded are not currently listed on the website. These should be added, setting out detail of grant, beneficiary and purpose of grant.
- Payments over £500 - The Council publishes monthly payments on the financial transparency page on the website. This had been updated to October 2022 at the time of my interim audit.
- CIL statement for 21-22 published on a separate web page

I am satisfied the Council has met obligations in this regard.

N: Publication requirements 21-22 AGAR

The Council has published the Accounts, Annual Governance Statement and the external audit certificate on the Council website. The Conclusion of Audit Certificate was published 22 September 2022 before the statutory deadline of 30 September. The external auditors issued a clear audit certificate on 9 September. The Council has met its obligations in this area. The Council was informed of the outcome of the audit at the meeting on 26 September 2022 (minute 228/22)

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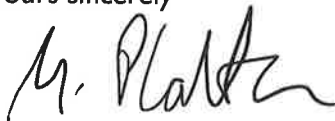
Company Registration Number 14174016
6 Uplands Road. Farnham GU9 8BP

0. Trusteeship

The Council disclosed that it was not a sole trustee for a trust fund in the 2021-22 AGAR.
The RFO confirms this is still the case.

I attach my invoice for your consideration. I will be in touch in February to make plans for the year end audit. Thanks for your help with the audit and please do not hesitate to contact me if I can be of any assistance.

Yours sincerely



Mike Platten CPFA

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Company Registration Number 14174016
6 Uplands Road. Farnham GU9 8BP

Appendix A

Matters Arising 22-23 Interim Audit

Matter Arising	Recommendation	Council Response
The Council is currently working through proposals to carry out refurbishment of the Woodland Centre.	Given the level of expenditure involved, it would be sensible to obtain VAT advice from a sector specialist to ensure the Council makes correct VAT decisions .	
The Council is overdependent on the RFO for the payment process, and there is insufficient separation of duties for some transactions (RFO raises PO, checks transaction and authorises payment at bank.)	I recommend that the Council sets up a system of dual authorisation for payments on the Council's bank accounts. This should require 2 signatories must sign in for all transactions, one to set up the payment, one to authorise.	
There are insufficient numbers of bank signatories with working online authorisation access to the bank accounts.	The Council could have issues paying staff and suppliers if RFO and Clerk were not available. Additional signatories should be set up with access to authorise payments.	
The budget monitoring report is comprehensive, giving analysis by nominal	There is scope for a short narrative report to be added to the budget monitoring report to set out key messages	

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centre on a departmental basis.	and explain any significant variances.	
The room booking process is manual, and there is no link to the Council's accounting system.	The Council may wish to consider investing in a room booking system which interfaces into Sage Accounts.	
The Council still offers the option of payment by cheque or cash. This should be removed from standard terms and conditions, and only offered in exceptional circumstances. Management of cash and cheques is time consuming and will become more difficult as bank closures continue.	Payments from customers should be made by card or bank transfer wherever possible. The Council should also consider moving allotment rental collection to an annual direct debit.	
Grants awarded – Details of grants awarded are not currently listed on the website.	These should be added, setting out detail of grant, beneficiary and purpose of grant.	
The Council has received a number of payments relating to a Halloween event held in the village, it is understood these were for stalls at the event. However, no fees were agreed by the Council in advance of the event, and the RFO was not	Going forward, fees for all one off events must be agreed in advance, following consultation with the RFO	

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consulted to ensure VAT was included in charges. .		
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6 Uplands Road. Farnham GU9 8BP

Caroline Harris

Rustington Parish Council

28 September 2022

Dear Caroline

Internal Audit 2022-23 - Terms of Engagement

April Skies Accounting Ltd is happy to supply Mike Platten to act as internal auditor to Rustington Parish Council. April Skies Accounting is able to carry out the internal audit for the Council for 2022-23 financial year at a cost of £575 plus travel from Farnham in Surrey.

We are writing to confirm the terms of our appointment. This engagement letter sets out the basis on which we are engaged to act as internal auditors and our respective areas of responsibility.

I. Responsibilities of the Council

- I.1 The Council is responsible for ensuring that it maintains an adequate system of internal control, including measures designed to prevent and detect fraud and corruption. For clarity, responsibility for safeguarding the assets of the Council and for the prevention and detection of fraud, error and non-compliance with law or regulations rests with the Council.
- I.2 The Council is also responsible for ensuring that accounting statements are prepared in accordance with the requirements of accounting regulations applicable to parish councils.
- I.3 The Council should make available to internal audit, as and when required, all accounting records and all other relevant records and related information, including minutes of all meetings. We are entitled to obtain from the Council's members and employees any information or documentation we think necessary for the performance of our duties as internal auditors.
- I.4 We, as your internal auditors cannot absolve management of responsibility for internal controls and must ensure that we are not involved in the operation of controls or making management decisions as such activities may compromise our objectivity.

2. Responsibility of Internal Audit

- 2.1 It is our duty to complete and sign off section 4 of the Annual Return for Local Councils in England. We must report on the following assertions:

Table I – Internal Control Objectives

Source: *Annual Return for Local Councils in England*

A	Appropriate books of account have been kept properly throughout the year
B	The Council's financial regulations have been met, payments were supported by invoices, all expenditure was approved and VAT was appropriately accounted for.
C	The Council assessed the significant risks to achieving its objectives and reviewed the adequacy of arrangements to manage these
D	The annual precept 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	Petty cash payments were properly supported by receipts, all petty cash expenditure was approved and VAT appropriately accounted for.
G	Salaries to employees and allowances to members were paid in accordance with council approvals, and PAYE and NI requirements were properly applied.
H	Asset and investments registers were complete and accurate and properly maintained.
I	Periodic and year-end bank account reconciliations were properly carried out.
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, were supported by an adequate audit trail from underlying records, and where appropriate debtors and creditors were properly recorded.
K	Exemption from limited assurance review (smaller councils only)
L	Transparency Code (smaller councils compliance)
M	Inspection - Council met responsibilities to allow public inspection of the accounts
N	Publication requirements AGAR
O	Trust funds (including charitable) The council met its responsibilities as a trustee.

- 2.2 We will carry out any audit testing we deem necessary to complete section 4 of the Annual Return for Local Councils in England. Internal Audit has a responsibility to report any evidence of what we judge to be material non-compliance with any of the assertions set out in table I above via the annual report.
- 2.3 We will also report to you in writing any areas where we judge your systems of internal control may need to be strengthened, on completion of our audit work.

3. Scope of Audit

- 3.1 Our internal audit will be conducted in accordance with current practices and guidelines, specifically those set out in section 4 of "Government and Accountability for Local Councils - A Practitioners Guide."
- 3.2 The scope of our work is limited to completing the audit testing and enquiries we deem necessary to complete Section 4 of the Annual Report for Local Councils in England. We will not provide assurance over or accept responsibility for areas of work not included in this scope, unless specifically agreed with the Council in the course of the financial year.
- 3.3 In providing internal audit services we are not conducting a financial statement audit in accordance with standards and guidelines issued by the Audit Practices Board and our procedures are not designed to provide assurance over the reliability and quality of your financial statements and management information.

4. Communication

- 4.1 We will contact you by email in order to confirm arrangements for the audit.
- 4.2 We will set out any matters arising from the audit in the following formats:
- by email, on conclusion of the audit, to enable discussion of recommendations
 - a report will be issued by email, in time to enable you to complete the Annual Return
- 4.3 We will of course contact you regularly in the course of the financial year with regard to audit and other matters.
- 4.4 Our fees do not include attendance at meetings of the Council. If this is required, an additional charge will be incurred.

5. Electronic Publication

- 5.1 Where audited financial information is published digitally by the Council, it is the responsibility of the Council to ensure that any such publication properly presents the financial information and auditor's report.
- 5.2 It is your responsibility to ensure there are controls in place to prevent or detect quickly any changes to electronically published information. The maintenance and integrity of electronically published information is the Council's responsibility and we accept no responsibility for changes made to audited information after it is first posted.

6. Limitation of liability

- 6.1 The work carried out under the terms of this engagement letter is solely for the use of Rustington Parish Council. We neither owe nor accept any duty of care to any other third party.

7. Competence

- 7.1 April Skies Accounting Ltd provides the services of Mike Platten to Rustington Parish Council in respect of the above assignment. Mike Platten is a member of the Chartered Institute of Public Finance and Accountancy (CIPFA). CIPFA maintains a professional disciplinary scheme under which complaints of misconduct by CIPFA members will be investigated. The client has a right to refer to CIPFA any matters affecting professional conduct or competence.

8. Continuity and Substitution

- 8.1 April Skies Accounting Ltd may, with the prior written approval of the Client, appoint a suitably qualified and skilled substitute to perform the services instead of the individual, provided that the substitute shall be required to enter into direct undertakings with the Client, including with regard to confidentiality. If the Client accepts the substitute, the Consultant Company shall continue to invoice the Client and shall be responsible for the remuneration of the substitute.

9. Insurance

- 9.1 April Skies Accounting Limited holds professional indemnity insurance cover to a limit of £250K. The professional indemnity insurer is Xbridge Limited, 6th Floor, 99 Gresham Street London EC2V 7NG

10. Independence

- 10.1 April Skies Accounting Ltd has no relationship with staff or Councillors of Rustington Parish Council, beyond that required to carry out a professional internal audit. Furthermore, in line with NALC guidance, April Skies Accounting Ltd will not take on any form of consultancy work with the Council.

11. Period of engagement

- 11.1 This letter is effective for accounting periods ending on or after 31-03-2023. Any matters arising in respect of prior periods will be dealt with in accordance with best practice.

12. Fees

- 12.1 We calculate our fees using a standard hourly rate plus expenses. Mileage will be charged at 45p mile. All other expenses will be charged at cost.
- 12.2 Invoices should be settled within 30 days of submission to the Council.
- 12.3 Our fee assumes a robust level of internal controls at the Council and documented procedures of a high standard. If additional work is required, this is charged at £60 per hour.

13. Agreement of terms

- 13.1 If, having considered the terms of this engagement letter, you conclude they are reasonable, and you wish to engage us on these terms, please let us have your written agreement to these arrangements by returning to us a signed copy of this engagement letter.

Yours faithfully



Mike Platten

April Skies Accounting Ltd

Rustington Parish Council agrees the appointment of April Skies Accounting Limited subject to the terms of this engagement letter

Signed: _____

Printed Name: _____

Position: _____

Date: _____

April Skies Accounting

Control Objective	Category of Work	documents required
General	Minutes	Please ensure minutes are up to date on website before my audit, I read them in order to gain an understanding of what is happening at the Council
	Update	Please let me have a brief outline of any major issues at the Council I should be aware of (short paragraph by email). I am interested in major projects,PWLB applications, issues around finances etc
A Appropriate books of account have been kept properly throughout the year	check opening balance sheet	Opening balance sheet from accounting system or opening cashbook and bank statement (period 0 balance sheet if you use RBS Omega or Alpha)
	Proper report of audit reports to members	Minutes showing internal and external audit reports have been reported to members
	mid year balance sheet	Please let me have a copy of balance sheet at 30.9.22 if you are able to do this
	VAT	Most recent vat return and supporting financial reports
	Access to Finance System	If running an accounting package, report from system showing who has access to the package
B The Council's financial regulations have been met, payments were supported by invoices, all expenditure was approved and VAT was appropriately accounted for.	Expenditure testing	Cashbook for full financial year to date I will select a sample of transactions - I will then need to see invoices / payment approval at council meeting / screen print of approval at bank / purchase order
	Tenders and quotes	For any expenditure items over £5k - detail of quotes obtained and approval to spend by Council
	Governance Documents	Details of meeting at which financial regs and standing orders were last updated
	Insurance	Current insurance policy and details of review of assets to ensure proper insurance level
C The Council assessed the significant risks to achieving its objectives and reviewed the adequacy of arrangements to manage these	IT back up	Confirm computer back up has been tested and documented
	Risk assessment process	Risk assessment for 22-23 - I need to check arrangements are in place to get this approved at Full Council before 31 March. I am looking for active review of the risk assessment by the Council
	23-24 Budget	Outline plans for budget and precept setting and key dates for approval of final budgets in Jan / feb
D The annual precept requirement resulted from an adequate budgetary process; progress against the budget was regularly monitored; and reserves were appropriate		How is the Council managing inflationary issues in budget setting ?

	Budget v Actuals reporting in year	Q2 budget report for members plus budget v actual reports from finance system
E Expected income was fully received, based on correct prices, properly recorded and promptly banked; and VAT was appropriately accounted for.	fees and charges Income transactions	Evidence of reserves being considered in budget setting and monitoring Minutes of council meeting showing approval of fees and charges for 22-23 Cashbook for year to date - I will select a sample from this for verification Details of any debts outstanding at date of audit - debtors ledger or similar supporting documentation for any grants / receipts above £500
F Petty cash payments were properly supported by receipts, all petty cash expenditure was approved and VAT appropriately accounted for.		Any petty cash - if so details of last count
G Salaries to employees and allowances to members were paid in accordance with council approvals, and PAYE and NI requirements were properly applied.	test staff paid correct rate of pay	August payroll - I want to see payroll summary for month so I can agree to ledger. I also want to see payslips for all staff. I will want to test gross pay per payslip back to approved rate of pay for the officer (usually annual pay award letter or part 2 minute of Council meeting) . I will also check staff sampled have a written contract August payroll - agree payments to HMRC and pension bodies back to payroll summary Log into HRMC portal and confirm council is up to date with payments to HMRC Confirmation the Council is up to date with RTI submission to HMRC,
H Asset and investments registers were complete and accurate and properly maintained.	year end	Discuss process for asset register update in course of 22-23
I Periodic and year-end bank account reconciliations were properly carried out.	Bank reconciliation	Month 6 (Sept) bank reconciliation with evidence of review by Councillors . I want to see reconciliation, bank statements and evidence of review for all bank accounts Does the Council have an investment policy (deposits over £100K) ? When was this last reviewed by Council and how is compliance with the policy monitored
J Accounting statements prepared during the year were prepared on the correct accounting basis	year end	Receipts and payments only possible if income / expenditure below £200K
L - compliance with transparency code for Councils under £25K and over £200K	website	Small councils (under £25K) website reporting of AGAR and inspection rights . Large Councils (over £200K) Full Transparency Code compliance.
M Inspection - Council met responsibilities to allow public inspection of the accounts	Inspection regulations followed	Please send me the inspection of accounts notice for 21-22 accounts
N - publication 2022 Agar	website reporting of audited 21-22 AGAR	Conclusion of audit and accounts / governance statement and external audit certificate on website
O Trust funds (including charitable) The council met its responsibilities as a trustee.	check statutory documents completed	Confirm charity commission submissions up to date . Confirm separate charity accounting and meetings - only if applicable.

RUSTINGTON PARISH COUNCIL RISK ASSESSMENT

Risk Assessment is a systematic general examination of working conditions, workplace activities and environmental factors that will enable the employer to identify any and all potential risks inherent in the workplace or its practices. Based on a recorded assessment the employer should then take all practical and necessary steps to reduce or eliminate the risks, insofar as is practicably possible. Making sure that all employees are made aware of the results of the risk assessment.

This document has been produced to enable the Parish Council to assess the risks that it faces and satisfy itself that it has taken adequate steps to minimise them. In conducting this exercise, the following plan was followed:-

- Identify the areas to be reviewed
- Identify what the risk may be
- Evaluate the management and control of the risk and record all findings
- Review, assess and revise if required.

FINANCIAL MANAGEMENT

Subject	Risk(s) Identified	H/M/L	Management/Control of Risk Overview	Review/Assess/Revise
Precept	<p>Adequacy of Precept in order for the Council to carry out its Statutory Duties</p> <p>Requirements not submitted to the District Council</p> <p>Amount not received by the District Council</p>	L	<p>The Finance and General Purposes Committee reviews the Precept requirement annually and makes recommendations to the Council at the January Meeting. The Council reviews the presented Budget update information, including actual position and projected position to year end and estimated figures for the next financial year. With this information the Council then agrees the amounts set for the specific Budget headings for the following year, the total of which is resolved to be the Precept amount to be requested from Arun District Council (ADC). This figure is submitted by the Clerk in a letter of request to ADC. The Clerk informs the Council when the monies are received (at the end of April and September). The money is recorded in the Monthly Report to Council, detailing all Income and Expenditure.</p>	<p>Existing procedures adequate.</p> <p>Review when necessary.</p>
Financial Records	<p>Inadequate Records</p> <p>Financial Irregularities</p>	L	<p>The Council has Financial Regulations that set out the requirements. These Regulations are provided by the National Association of Local Councils and were most recently revised and adopted by the Council on 28 February 2022.</p>	<p>Existing procedures adequate. The Finance and General Purposes Committee reviews the Financial Regulations when necessary and make recommendations to Full Council.</p>

Bank and Banking	<p>Inadequate checks</p> <p>Bank Mistakes</p> <p>Loss</p> <p>Charges</p>	L	<p>The Council has Financial Regulations that set out the requirements for banking, cheques and reconciliation of accounts. The RFO reconciles the bank accounts once a month. The RFO reviews the Councils banking arrangements regularly. Accounts are annually reviewed by internal and external audit.</p>	<p>Existing procedures adequate. Review the Financial Regulations and bank signatory list when necessary, especially after an Annual Meeting and an Election.</p> <p>Monitor the bank statements monthly.</p>
Cash	<p>Loss through theft or dishonesty</p>	L	<p>The Council has Financial Regulations that set out the requirements. Cash received is banked on a regular basis. The Council's Insurance Policy has a Fidelity Guarantee.</p>	<p>Existing procedures adequate.</p> <p>Review the Financial Regulations when necessary.</p> <p>Ensure Fidelity Insurance is adequate.</p>
Reporting and Auditing	<p>Information Communication</p> <p>Compliance</p>	L M	<p>Monthly reconciliation prepared by RFO. A Budget monitoring statement is prepared monthly by the RFO and presented to Full Council. A full list of payments and receipts are provided at the Finance and General Purposes Meeting and the financial records (including a breakdown of the receipts and payments). The bank balances are presented each month and checked against the bank statement, by a Member of the Committee, on a quarterly basis. Council should regularly audit internally to comply with the Fidelity Guarantee. The Council undertakes an Annual Review of the Effectiveness of its Internal Audit Arrangements. There is a Bi-Annual Internal Audit the outcome of which is reported to Full Council.</p>	<p>Existing communication and auditing procedures adequate.</p>

Direct Costs Overhead Expenses Debts	<p>Goods not supplied but billed</p> <p>Incorrect invoicing</p> <p>Cheque payable incorrect</p> <p>Unpaid invoices</p>	L	The Council has Financial Regulations that set out the requirements. The RFO prepares a schedule of payments requiring authorisation and presents the schedule together with the relevant invoices to the Clerk, Chairman and Vice-Chairman of the Finance and General Purposes Committee, or two other Authorised Signatories, to review the schedule for compliance and, having satisfied themselves shall authorise payment. The schedule forms part of the Agenda for the Finance and General Purposes Committee Meeting and the Committee retrospectively approves the payments.	<p>Existing procedures adequate.</p> <p>Review the Financial Regulations when necessary.</p>
Grants and support - payable	<p>Power to pay</p> <p>Authorisation of Council to pay</p>	L	All such expenditure goes through the required Council process for approval, minuted and listed accordingly if a payment is made using S137 Powers of Expenditure.	Existing procedures adequate.
Grants - receivable	Receipt of Grants/Precept	L	The Parish Council receives the Precept from the District Council annually paid in two instalments. Receipt is reported to the Council at the next Full Council Meeting within the Financial Monthly Report. Any one off grants would come with their own terms and conditions to adhere to.	Existing procedures adequate.
Charges - Rentals payable	Payments of leases/rentals	L	Samuel Wickens Centre - rent paid to Store Property on an annual basis. Woodland Park Sportsfield - rent paid quarterly to West Sussex County Council.	Existing procedures adequate.
Charges - Rentals receivable	<p>Receipt of rent</p> <p>Insurance implication</p>	<p>L</p> <p>M</p>	<p>Room hire - Hirers pay in advance of date of booking. Sport's pitches - the RFO invoices Clubs for use of pitches as and when the pitches are used.</p> <p>Clubs/Organisations are covered by their own insurance.</p>	<p>Existing procedures adequate.</p> <p>Review agreement and fees annually.</p> <p>Ensure payments received.</p>

Best Value Accountability	Work awarded incorrectly	L	As per Financial Regulations normal Parish Council practice would be to seek, if possible, more than one quotation for any substantial work required to be undertaken or goods. For major contract services, formal competitive tenders would be sought. If a problem is encountered with a contract the Clerk would investigate the situation, check the quotation/tender, research the problem and report to Council.	Existing procedures adequate.
	Overspend on services	M		Review Financial Regulations regularly.
Salaries and associated costs	Salary paid incorrectly	L	The Parish Council authorises the recruitment of all employees at Council Meetings. The Clerk is also authorised to recruit employees and report back to Full Council asap. Salary rates are assessed annually by the Council and applied on 1st April each year. Salary is paid by BACS each month (in 12 equal instalments) for a set number of hours and reported to the Council. Income tax is calculated using SAGE Payroll and paid monthly. All Personnel keep a record of hours worked which are checked by the Deputy Clerk and the RFO. All Personnel have a Contract of Employment and Job Description.	Existing appointment and payment system is adequate.
	Wrong hours paid			
	Wrong rate paid			
	False employee			
	Wrong deductions of Tax			
	Unpaid contributions to the Inland Revenue			
Employees	Fraud by staff	L	Requirements of Fidelity Guarantee Insurance adhered to with regards to fraud. All Employees to be given adequate training and safety equipment to be able to perform their roles. Health & Safety Policy reviewed annually.	Existing procedures adequate.
	Health & Safety	L		Monitor Health & Safety requirements and insurance requirements annually.
Clerk	Loss of Clerk	L	The Clerk has a notice period in their Contract of Employment enabling time for recruitment.	Existing procedures adequate.
	Health & Safety	L	The Clerk should be provided with relevant training, reference books, access to assistance and legal advice required to undertake the role.	Purchase reference books where necessary. Membership of CALC (County Association of Local Councils). Monitor working conditions, safety requirements and insurance annually.
	Fraud	L	The requirements of the Fidelity Guarantee Insurance to be adhered to with regards to Fraud.	Existing procedures adequate.

Councillor Allowances	Councillors over-paid Income Tax deduction	L	The Chairman has a budgeted annual allowance that is used as necessary for sundry items. Expenses are monitored to ensure the Budget is not exceeded and expenditure reported monthly to the Council. Allowances are paid to all elected Parish Councillors on a quarterly basis.	Existing procedures adequate.
Election Costs	Risk of Election Cost	L/M	Risk is higher in an election year. When an election is due the Clerk will obtain an estimate of costs from the District Council for a full election and an uncontested election. There are no measures which can be adopted to minimise the risk of having a contested election as this is a democratic process and should not be stifled.	Existing procedures adequate.
VAT	Re-claiming/charging	L	The Council has Financial Regulations that set out the requirements.	Existing procedures adequate.
Annual Return	Submit within time limits	L	The Council's Annual Return is completed and submitted online to HMRC within the prescribed time frame by the RFO. The Annual Return is completed and signed by the Council, submitted to the Internal Auditor for completion and signing then checked and sent on to the External Auditor within time limit.	Existing procedures adequate.

ORGANISATIONAL MANAGEMENT

Subject	Risk(s) Identified	H/M/L	Management/Control of Risk	Review/Assess/Revise
Business Continuity	Risk of Council not being able to continue its business due to an unexpected or tragic circumstance	L	<p>All files and recent records are kept on site at the Parish Council Offices, 34 Woodlands Avenue. All electronic files are backed up to the Council's Server on a daily basis. Paper copies of Meeting Minutes are kept in a fire proof safe on site. In the event of the Clerk being indisposed, the Deputy Clerk and Chairman to contact the CALC for advice.</p> <p>The Senior Management Team are able to work from home to facilitate the continuation of Council Services should the Offices be closed for an unexpected reason.</p>	<p>Existing procedures adequate.</p> <p>Review when necessary.</p>
Legal Powers	Illegal activity or payments	L	All activity and payments within the Powers of the Parish Council to be resolved and minuted at Full Council. Clerk to hold or complete training and achieve CiLCA qualification. Clerk clarifies position on any new proposal. Legal advice is sought via CALC where necessary.	Existing procedures adequate.
Minutes Agendas Notices Statutory Documents	<p>Accuracy and Legality - Non-compliance with statutory requirements</p> <p>Business Conduct</p> <p>Proper and timely reporting via the Minutes</p>	<p>L</p> <p>L</p> <p>L</p>	<p>Minutes and Agendas are produced in the prescribed method by the Clerk and adhere to the Legal Requirements.</p> <p>Business conducted at all Council Meetings should be managed by the Chairman.</p> <p>Minutes are approved and signed at the next Committee or Council Meeting. Minutes and Agendas are displayed according to the legal requirements. Both are available to the public via the Parish Council website or from the Clerk.</p>	<p>Existing procedures adequate.</p> <p>Members to adhere to the Code of Conduct.</p>

Council Records - Paper	Loss through:- Theft Fire Damage	L M L	The Parish Council records are stored at the Woodlands Centre site. Records include current correspondence, minute books, bank statements, insurance etc. Recent materials are kept in metal filing cabinets (not fire proof) and older more historical records are stored in the loft of The Woodlands Centre building. Minute books and Leases/Deeds are kept within a fire proof safe on site as well as at the County Records Office.	Damage (apart from fire) and theft is unlikely and so provision is deemed adequate.
Council Records - Electronic	Loss through:- Theft Fire Damage Corruption of Computer Unauthorised Use	L	The Parish Council's electronic records are stored on a Council Server. Back-ups of the files are made at regular intervals. All PC's are protected by anti-virus software. Access is restricted through use of controlled passwords. Updates to computers advised by IT Provider. Only approved software is used. The Parish Council ensures that only a reputable Broadband provider is used.	Damage (apart from fire) and theft is unlikely and so provision is deemed adequate.
Insurance	Adequacy Cost Compliance Fidelity Guarantee	L	An annual review is undertaken (before the time of policy renewal) of all insurance arrangements in place. Employers and Employee Liability Insurance are a necessity and must be paid for. Ensure compliance measures are in place. Ensure Fidelity checks are in place. Price comparisons are undertaken for Best Value.	Existing procedures adequate. Review of insurance provision annually.
Data Protection	Policy Provision Breach of Confidentiality Breach of Data Protection Principles	L	The Council is registered with the Information Commissioner's Office (ICO). There is a formal procedure for dealing with Confidential Data. The Council has a published Privacy Notice. The Data Protection Policy was adopted on 23 July 2018. Staff have received training in Data Protection. Training to be provided for new Council formed in May 2023.	Ensure annual renewal of Registration and compliance with GDPR.
Freedom of Information Act	Failure to comply with the Act	L	The Council has a Model Publication Scheme for Local Councils in place. The Council is able, if it chooses, to request a fee for any information supplied to cover the cost of consumables and Officer time.	Monitor and report any impacts of requests made under the Act.

Meeting Location	<p>Adequacy</p> <p>Health & Safety including Lone Working</p>	L	<p>The Parish Council Meetings are held at the Council Offices in Woodlands Avenue. The premises and facilities are considered to be adequate for the Clerk, Councillors and Public who attend from Health & Safety and comfort aspects. The Health & Safety Policy is reviewed on an annual basis.</p>	Existing location adequate.
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ASSETS				
Subject	Risk(s) Identified	H/M/L	Management/Control of Risk	Review/Assess/Revise
Community Buildings:- Woodlands Centre Samuel Wickens Centre Youth Centre	Loss or Damage/Vandalism Risk/Damage to third party(ies)/property including injury, trips, slips and falls Failure to obtain necessary Licences e.g. PRS Inadequate Budget Provision	L	An Asset Register is kept up to date and insurance is held at the appropriate level for all items. Regular checks are made of all equipment and buildings by Parish Council Personnel. Inspections/Testing include: -Annual PAT Testing -Annual Heating Installation Check -Fire Alarm and Emergency Lighting System checked quarterly -First Aid Boxes checked and re-stocked weekly as required -Annual Fire Risk Assessment -Regular buildings check e.g. lighting, fire doors, emergency phone etc. -Weekly Fire Alarm testing. PRS Licence renewed Annually for all sites. Responsibility of Hirers is clearly defined in the Hall Hire Agreement. Anticipated costs are adequately provided for within the Budgetary process. All hire charges are reviewed annually.	Existing procedures adequate. Review insurance requirements annually.
Play Area and MUGA (Basketball Court) and Outdoor Fitness Equipment	Loss or Damage/Vandalism Risk/Damage to third party(ies) - personal injury Inadequate insurance cover Inadequate Maintenance Records	L/M L L L	An Asset Register is kept up to date and insurance is held at the appropriate level for all items. Daily Checks are made by Parish Council personnel. Any vandalism is recorded and reported to Sussex Police. Play Area is locked overnight. Monthly Play Area inspection completed by Local Authority. Annual Play Area Inspection completed by The Play Inspection Company. All reports are filed and any actions form part of a Works programme.	Existing procedure adequate. Maintain liaison with Police and ASB Team. Review insurance requirements annually.

Allotments	Inadequate insurance cover	L	Insurance requirements are reviewed annually.	Existing procedures adequate. The Allotments Committee meets on a quarterly basis.
	Vandalism	L/M	Sites are visited regularly and Parish Council personnel respond promptly to any complaints of vandalism.	
	Vermin	L	Tenancy Agreement outlines standards of cleanliness for the sites. Contract held with the District Council's preferred Contractor to carry out monthly vermin inspections of all sites. Complaints from plot holders dealt with promptly.	
	Inaccurate/out of date Allotment Register	L	Allotment Register maintained electronically and all amendments are promptly recorded. Agreements are completed and signed prior to occupation.	
	Untidy Plots	L	Plots are inspected on a monthly basis.	
	Failure to collect Rents	L	Proper records of income received and maintained are kept. Renewal procedure is established and in place.	
	Failure to review Rents	L	Rents are reviewed on an annual basis with costs confirmed one year in advance.	
	Unoccupied plots/loss of income	L	Waiting List is maintained. How to apply for an Allotment detailed on the Parish Council website as well as articles in the Parish Newsletter and on Facebook.	

Museum	Temperature, Humidity Controls and Museum Pests	L	Data Loggers in store room and main gallery - these are monitored regularly for humidity and temperature readings.	Review insurance requirements annually. Existing procedures adequate.
	Inadequate insurance cover	L	Insurance requirements are reviewed annually.	Review required for storage of Collection at The Woodlands Centre.
	Museum ineligible for external funding	L	Museum to maintain Accreditation status to improve eligibility for external funding.	
	Inadequately trained staff	L	Museum staff training reviewed annually via the Appraisal process. Specialist training sought through the Museum's Association and the Sussex Museum's Group.	
	Accidental damage to the Collection	L	Team trained in handling objects. Items on display are monitored by CCTV and checked regularly. Items stored safely within storage areas with adequate protection.	
	Natural Disasters - flooding, fire	L	Emergency Plan is in place and salvage kit kept on site.	
	Data Protection issues	L	All consent/loan forms are retained on file only for as long as is needed.	
	Security of Collection	L	CCTV in galleries and a locking up procedure is in place. Adequate insurance in place.	
Noticeboards	Risk/Damage/Injury to third parties	L	The Parish Council has a variety of noticeboards placed across the Village which are listed on the Asset Register. All locations have approval by relevant parties and insurance cover. They are inspected regularly and any repairs/maintenance brought to the attention of the Clerk.	Existing procedures adequate.
	Roadside safety			Two noticeboards are currently not in situ and are awaiting refurbishment or replacement.

Public Seats	<p>Risk/Damage/Injury to third parties</p> <p>Roadside safety</p>	L	The Parish Council has a variety of public seats placed across the Village. All locations have approval by relevant parties and insurance cover. They are inspected regularly and any repairs/maintenance brought to the attention of the Clerk. Arrangements are in place to remove any dangerous street furniture.	<p>Existing procedures adequate.</p> <p>Full audit of all public seats to be undertaken Summer 2023.</p>
Woodlands Recreation Ground and Woodland Park Sportsfield	<p>Loss or Damage/Vandalism</p> <p>Risk/Damage to third party(ies) - personal injury</p> <p>Inadequate insurance cover</p> <p>Loss of Grounds Maintenance Contractor</p> <p>Inadequate maintenance of Parish Council owned machinery</p> <p>Lone Working</p>	<p>L</p> <p>L</p> <p>L</p> <p>L</p> <p>L</p> <p>L</p>	<p>An Asset Register is kept up to date and insurance is held at the appropriate level for all items.</p> <p>Daily Checks are made by Parish Council personnel. Any vandalism is recorded and reported to Sussex Police.</p> <p>Grounds Maintenance is undertaken by an external contractor.</p> <p>Should the contractor be unable to fulfill their duties the Parish Council Leisure and Amenities Officer would undertake works in the interim.</p> <p>Parish Council machinery is routinely maintained.</p> <p>There is a named point of contact for any individual working alone. The individual must carry a mobile phone. The Clerk is responsible for ensuring that all those working alone are properly instructed, especially with First Aid training. Personal Protective Equipment supplied.</p>	<p>Existing procedures adequate.</p>

Shelters	<p>Loss or Damage/Vandalism</p> <p>Risk/Damage to third party(ies) - personal injury</p> <p>Inadequate insurance cover</p> <p>Lone Working</p>	L	<p>The Parish Council has 15 Bus Shelters and one Beach Shelter within the Parish which are listed on the Asset Register. All locations have approval by relevant parties and insurance cover. They are inspected regularly and any repairs/maintenance brought to the attention of the Clerk. There is a named point of contact for any individual working alone. The individual must carry a mobile phone. The Clerk is responsible for ensuring that all those working alone are properly instructed, especially with First Aid training. Personal Protective Equipment supplied.</p>	Existing procedures adequate.
Public Toilets	<p>Loss or Damage/Vandalism</p> <p>Risk/Damage to third party(ies) - personal injury</p> <p>Inadequate insurance cover</p> <p>Lone Working</p>	L/M	<p>The Parish Council holds responsibility for 4 Public Toilet facilities within the Parish which are all listed on the Asset Register. All have sufficient insurance cover. They are inspected regularly and any repairs/maintenance brought to the attention of the Clerk by the external contractor Biffa as part of the District Council's Cleansing Services Contract. They are locked overnight. There is a named point of contact for any individual working alone. The individual must carry a mobile phone. The Contractor, Biffa, is responsible for ensuring that all those working alone are properly instructed. Personal Protective Equipment supplied.</p>	<p>Existing procedures adequate.</p> <p>New Toilet Cleansing Contract commenced from 1 April 2023.</p> <p>The Public Toilet Facility located at The Street will have been closed to the public as of 1 April 2021. Regular building inspections continue to be undertaken. A Changing Places Unit will be opened in 2023/24.</p>
Civic Regalia	Theft/Loss or Damage	L	Insurance is in place and reviewed annually.	Existing procedures adequate.

COUNCILLORS' PROPRIETY				
Subject	Risk(s) Identified	H/M/L	Management/Control of Risk	Review/Assess/Revise
Members Interests	Conflict of Interest	L	Declarations of Interest recorded at all Council Meetings.	Existing procedures adequate.
	Register of Members Interests	L	Register of Members' Interests forms reviewed annually. Councillors notify the Clerk of any changes throughout the year. Can be viewed on the Parish Council Website.	

RUSTINGTON PARISH COUNCIL

HEALTH AND SAFETY POLICY STATEMENT IN ACCORDANCE WITH SECTION 2 (3) OF THE HEALTH AND SAFETY AT WORK ETC. ACT 1974

PART I - INTRODUCTION

This document has been compiled to provide information and guidance to all employees on this Council's Health and Safety Policy and organisational arrangements for implementation of that Policy. In addition, there may be Codes of Practice for certain working areas within the Council's control.

PART II - STATEMENT OF HEALTH AND SAFETY POLICY

- 1.1 It is the policy of this Council to provide and maintain safe and healthy working conditions, plant, equipment and systems of work for all our employees, volunteers and visitors, and to provide such information, training and supervision as they need for this purpose. The Council accepts its responsibility for the health and safety of other people who may be affected by its activities. Safety is of paramount importance to the Council and is taken seriously.
- 1.2 The allocation of duties for safety matters and the particular arrangements which the Council will make to implement the Policy are set out below.
- 1.3 The Policy will be kept up to date and reviewed on an annual basis.

PART III - THE ORGANISATION AND RESPONSIBILITIES

1. Overall Responsibility

The Clerk of the Council, has overall and final responsibility for ensuring:-

- (a) the provision and implementation of the Health and Safety Policy
- (b) advising the Council on all matters relating to Health and Safety and Welfare
- (c) reporting areas which are unsatisfactory and/or require remedial action; and
- (d) its annual review.

2. Delegated Responsibilities within the Council

- 2.1 The Caretaker, Managers and Administrative Assistants, to whom the second line health and safety supervision within The Woodlands Centre, Youth Centre, Samuel Wickens Centre and Museum has been delegated, will be responsible to the Clerk of the Council for the day to day supervision within their defined area of responsibility and, in particular, for:-
 - (a) establishing, in consultation with the Clerk of the Council, safe systems of work and procedures for carrying out the Council's Safety Policy incorporating any Regulations, approved Codes of Practice and other relevant Legislation

- (b) to ensure that safe working procedures and safe systems of work are implemented by staff in all of the Council's properties, and that a safe working environment is provided for them
 - (c) ensuring that any such staff under their control, receive adequate training, information and supervision to maintain safe standards
- 2.2 In addition, the Leisure and Amenities Officer will, as far as the Council's external facilities are concerned, be responsible for:-
- (a) maintaining safe working practices in order to achieve maximum safety
 - (b) ensuring adequate safety supervision and training where required, in particular, where young and inexperienced workers are concerned
 - (c) ensuring that all safety rules are observed and that protective clothing and equipment is worn or used where required
 - (d) ensuring that all machinery and equipment is properly maintained and safe to use and that guards are in position
 - (e) ensuring that all machinery and equipment is properly secured when not in use

All employees have the responsibility to co-operate with the object of achieving a healthy and safe workplace and to take reasonable care of themselves and others.

2.4 All Council employees are required to:-

- (a) make themselves familiar with and conform to the Council's Health and Safety Policy
- (b) observe safety rules at all times
- (c) where required, wear protective clothing and use appropriate safety devices provided
- (d) report to their immediate Line Manager all accidents, injuries to persons and damage to vehicles, plant and equipment
- (e) know the location of first aid facilities. Grounds/External Personnel are expected to carry a First Aid box in their vehicles at all times
- (f) report all safety hazards as a matter of urgency to their immediate Line Manager
- (g) know what to do in the case of fire or other emergency and the location of fire fighting equipment
- (h) maintain good housekeeping at all times
- (i) observe safe standards of behaviour and dress. Grounds/External Personnel are expected to wear fluorescent jackets provided
- (j) not enter into any kind of horseplay or practical joking

- 2.5 It is the policy of this Council that all employees shall receive training in all safety aspects of their occupation, and courses shall be held for this purpose.
- 2.6 It shall be the duty of staff to carry out a visual safety inspection of plant and equipment prior to using such machinery.
- 2.7 It shall be the responsibility of all Parish Council Personnel to ensure that all accidents are comprehensively reported in writing to the Clerk of the Council who, in turn, will issue instructions to ensure that these do not continue and, where appropriate, make recommendations to the Finance and General Purposes Committee or the Leisure and Amenities Committee on accident prevention.
- 2.8 It shall be the responsibility of the Youth Centre, Museum and Samuel Wickens Centre Caretaker, the Leisure and Amenities Officer, the Council Office's Administrative Assistants (The Woodlands Centre) and the Samuel Wickens Centre Administrative Assistants to monitor the maintenance of all plant and equipment.

PART IV - GENERAL ARRANGEMENTS

1. First Aid

- 1.1 First Aid boxes are located at various locations in each of the Council's properties. The Council Office's Administrative Assistants are responsible for carrying out periodical checks to ensure the contents are adequately maintained in The Woodlands Centre and the Council Offices.
- 1.2 First Aid boxes are also located at the Leisure and Amenities Officer's Accommodation, Woodlands Centre Recreation Ground. A First Aid box is also provided on the Council's vehicles. The Leisure and Amenities Officer is responsible for carrying out periodic checks to ensure the contents are adequately maintained.
- 1.3 First Aid boxes are also located in the kitchen and in the Norfolk Lounge at the Youth Centre. The Caretaker is responsible for carrying out periodical checks to ensure the contents are adequately maintained.
- 1.4 First Aid boxes are also located in the Reception Area and in the Community Hall Kitchen at the Samuel Wickens Centre. The Centre's Administrative Assistants, in conjunction with the Caretaker, are responsible for carrying out periodical checks to ensure the contents are adequately maintained.
- 1.5 A First Aid box is also located in the Museum Office. The Caretaker is responsible for carrying out periodical checks to ensure the contents are adequately maintained.

2. Defibrillators

- 2.1 Defibrillators, affixed to external walls, are located as follows:-

- The Woodlands Centre
- The Samuel Wickens Centre
- Churchill Car Park Public Toilets (behind Iceland and The Factory Shop)
- The Georgi Fin (Woodlands Avenue)
- Southern end of Sea Avenue (affixed to a resident's garden wall)
- Beach Shelter (Junction of Sea Road/Sea Lane)

- Pavilion Terrace building (facing the sea) (Princess Marina House, Broadmark Lane/Beach)

Volunteer Community First Responders (Mrs Sally Holmes) carry out periodic checks to ensure the Defibrillators are in correct working order.

3. Accidents, Injuries and Dangerous Occurrences

- 3.1 It shall be the responsibility of the Clerk of the Council to ensure that all incidents are recorded in the Accident Book and to report those Injuries, Diseases and other Dangerous Occurrences to the Health and Safety Executive on the appropriate form.
- 3.2 Accident Books are located in the Council Offices, at the Samuel Wickens Centre and the Museum. Accident Books for Hirers' use are located in all Halls/Rooms at The Woodlands Centre, Youth Centre and in the Community Hall at the Samuel Wickens Centre. Any such instances should always be reported to the Clerk of the Council as soon as practicably possible.

FIRE SAFETY

4. Escape Route

- 4.1 It shall be the responsibility of the Council Office's Administrative Assistants to ensure to the best of his/her ability, that the escape routes and passage ways are kept clear in The Woodlands Centre.
- 4.2 It shall be the responsibility of the Caretaker to ensure to the best of his/her ability, that the escape routes and passage ways are kept clear in the Youth Centre.
- 4.3 It shall be the responsibility of the Museum Manager and Administrative Assistant to ensure to the best of his/her ability, that the escape routes and passage ways are kept clear in the Museum.
- 4.4 It shall be the responsibility of the Caretaker and the Samuel Wickens Centre Administrative Assistants to assure to the best of his/her ability, that the escape routes and passage ways are kept clear in the Samuel Wickens Centre.

5. Fire Extinguishers, Fire Alarm System and Emergency Lighting

- 5.1 It shall be the responsibility of the Clerk of the Council to organise annual inspections of all fire extinguishers on the Council's premises.
- 5.2 The maintenance Companies responsible for carrying out these inspections are:-

Fire Extinguishers	-	D-Tect Fire & Security
Fire Alarm System	-	D-Tect Fire & Security
Emergency Lighting	-	D-Tect Fire & Security

6. Advice and Consultancy

The local Inspector's Office is located at:-
 Health and Safety Executive
 The Council Offices, Station Road East
 Oxted, Surrey RH8 0BT

The Incident Contact Centre's telephone number is:-
0345 300 9923 (Monday to Friday 8.30 am to 5.00 pm)

The HSE may need to respond out of hours:-

- following a work-related death;
- following a serious incident where there have been multiple casualties;
- following an incident which has caused major disruption such as evacuation of people, closure of roads, large numbers of people going to hospital etc.

For any such incidents, the Duty Officer's contact number is:-
0151 922 9235 (5.00 pm to 8.30 am)

The Health & Safety Executive's Website is - www.hse.gov.uk

7. Training

- 7.1 It shall be the duty of the Clerk of the Council to issue all newly appointed staff with a personal copy of the Rustington Parish Council's Health and Safety Policy and such supplements as are applicable to his/her duties and responsibilities.
- 7.2 It shall be the responsibility of the Clerk of the Council to ensure that all new manual staff receive adequate training in all safety aspects of their occupation and, in particular, the use of strimmers, mowers, hedge cutters and other dangerous machinery.

8. Contractors and Visitors

- 8.1 Where contractors and sub-contractors are engaged by the Parish Council, they must maintain effective control of themselves and those working under them so as to ensure that they comply with their responsibilities and duties under the Health and Safety at Work Etc., Act 1974.
- 8.2 The Parish Council shall ensure that those not in employment of the Council, including the general public, are not exposed to risk to their safety or health when on the Council's premises.

C A WARD
Clerk of the Council
(Reviewed March 2023)



RUSTINGTON PARISH COUNCIL

RUSTINGTON PARISH COUNCIL

Freedom of Information Act

Publication Scheme

(Adopted 24 November 2008)

Reviewed 27 March 2023



RUSTINGTON PARISH COUNCIL

INTRODUCTION

The Freedom of Information Act

The Freedom of Information Act 2000 grants to members of the public rights of access to all kinds of recorded information held by a wide range of public authorities. Information about the Act is available from the Information Commissioner's Office at www.ico.gov.uk.

Publication Scheme

Under the Act every Public Authority is required to adopt and maintain a Publication Scheme. This Scheme provides the public with a structured listing of any information released and a commitment to make it available to all. The Scheme sets out how the Council intends to publish the different Classes of information it makes available and whether it needs to charge for providing the information.

Freedom of Information Requests and the Publication Scheme

It is important to note that a publication Scheme simply sets out the information that is routinely available. Information that is not listed in the Information Available Guide of this document can still be requested and it will be made available unless it can be legitimately withheld. This can be done by making a written request to the Parish Clerk who will reply within 20 working days after receipt of the request.

The Council's Commitment to the Act

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



RUSTINGTON PARISH COUNCIL

MODEL PUBLICATION SCHEME

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

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

The Scheme commits an authority:

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

Classes of information

Who we are and what we do

Organisational information, locations and contacts, constitutional and legal governance.

What we spend and how we spend it

Financial information relating to projected and actual income and expenditure, tendering, procurement and contracts.

What our priorities are and how we are doing

Strategy and performance information, plans, assessments, inspections and reviews.



RUSTINGTON PARISH COUNCIL

How we make decisions

Policy proposals and decisions. Decision making processes, internal criteria and procedures, consultations.

Our policies and procedures

Current written protocols for delivering our functions and responsibilities.

Lists and registers

Information held in registers required by law and other lists and registers relating to the functions of the authority.

The services we offer

Advice and guidance, booklets and leaflets, transactions and media releases. A description of the services offered.

The classes of information will not generally include:

- Information the disclosure of which is prevented by law, or exempt under the Freedom of Information Act, or is otherwise properly considered to be protected from disclosure
- Information in draft form
- Information that is no longer readily available as it is contained in files that have been placed in archive storage, or is difficult to access for similar reasons.

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

The authority will indicate clearly to the public what information is covered by this Scheme and how it can be obtained.

Where it is within the capability of a public authority, information will be provided on a website. Where it is impracticable to make information available on a website or when an individual does not wish to access the information by the website, a public authority will indicate how information can be obtained by other means and provide it by those means.

In exceptional circumstances some information may be available only by viewing in person. Where this manner is specified, contact details will be provided. An appointment to view the information will be arranged within a reasonable timescale.

Information will be provided in the language in which it is held or in such other language that is legally required. Where an authority is legally required to translate any information, it will do so.

Obligations under disability and discrimination legislation and any other legislation to provide information in other forms and formats will be adhered to when providing information in accordance with this Scheme.



RUSTINGTON PARISH COUNCIL

Charges which may be made for information published under this Scheme

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

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

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

Charges may be made for actual disbursements incurred such as:

- photocopying
- postage and packaging
- the costs directly incurred as a result of viewing information.

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

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

Written requests

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

Please note that should information requested and the cost of complying with a request that exceeds £450 (this is calculated on the basis of 18 hours work at £25 per hour) the Council is entitled to make a charge known as 'prescribed costs' which include the costs of locating the information, retrieving the information, extracting the information from a document containing it, informing you whether we hold the information and communicating the information to you prior to complying with your request. Alternatively the Council may refuse the request.

You will be informed as early on in the process in writing if the request is likely to exceed £450 so that you have the option to adjust your request to bring it under the £450 limit. Where the cost of complying with the request does not exceed £450 the Council may only charge for disbursements which include photo-copying, printing, postage etc. You will be informed as early on in the process as possible if a charge is payable. Any charges must be paid prior to the information being sent. The requestor will have 60 days to pay the fees, failing which the request will be closed.



RUSTINGTON PARISH COUNCIL

Information available from Rustington Parish Council under the Model Publication Scheme

Information to be published	How the information can be obtained	Cost
Class1 – Who we are and what we do <i>(Organisational information, structures, locations and contacts)</i> <i>(Current information only)</i>		
About Rustington and The Parish Council	Website Hard Copy - Parish Clerk	Free £0.05 A4 copy
Membership List of Councillors	Website Hard Copy - Parish Clerk Notice Boards Community Buildings Notice Boards	Free £0.05 A4 copy Free Free
List of Committees	Website Community Buildings Notice Boards	Free Free
Contact Details for Parish Clerk and Council Members	Website Hard Copy - Parish Clerk	Free £0.05 A4 copy
Location of main Council Office, Village Information Centre, Buildings and Land in ownership of the Parish Council and accessibility details	Website Hard Copy - Parish Clerk	Free £0.05 A4 copy
Staffing Structure	Website Hard Copy - Parish Clerk	Free £0.05 A4 copy
Staff Vacancies and Employment Opportunities	Website Hard Copy - Parish Clerk Notice Boards Community Buildings Notice Boards	Free £0.05 A4 copy Free Free
Parish Newsletter (issued quarterly)	Website Hard Copy (distributed to parishioners homes)	Free Free
Class 2 – What we spend and how we spend it <i>(Financial information relating to projected and actual income and expenditure, procurement, contracts and financial audit)</i> <i>(Current and previous financial year as a minimum)</i>		
Annual Return Form and Report by Auditor	Website Hard Copy - Parish Clerk Notice Boards Community Buildings Notice Boards	Free £0.05 A4 copy Free Free



RUSTINGTON PARISH COUNCIL

Internal Auditor Reports to Council (twice yearly)	Hard Copy - Parish Clerk	£0.05 A4 copy
Finalised Budget	Website Hard Copy - Parish Clerk	Free £0.05 A4 copy
Precept	Website Hard Copy - Parish Clerk	Free £0.05 A4 copy
Financial Standing Orders and Regulations	Website Hard Copy - Parish Clerk	Free £0.05 A4 copy
Grants given and received	Website Hard Copy - Parish Clerk	£0.05 A4 copy
List of current Contracts awarded and value of Contract	Hard Copy - Parish Clerk	£0.05 A4 copy
Members' Allowances and Expenses	Website Hard Copy - Parish Clerk	Free £0.05 A4 copy
Community Hall Hire Charges	Website Hard Copy - Parish Clerk	Free £0.05 A4 copy
Class 3 – What our priorities are and how we are doing <i>(Strategies and plans, performance indicators, audits, inspections and reviews)</i>		
Community Action Plan	Hard Copy - Parish Clerk	£0.05 A4 copy
Annual Report to Parish Meeting <i>(Current and previous year as a minimum)</i>	Website Hard Copy - Parish Clerk	Free £0.05 A4 copy
Class 4 – How we make decisions <i>(Decision making processes and records of decisions)</i> <i>(Current and previous Council year as a minimum)</i>		
Timetable of Meetings (Council, any Committee/Sub-Committee Meetings and Parish Meetings)	Website Hard Copy - Parish Clerk Notice Boards Community Buildings Notice Board	Free £0.05 A4 copy Free Free
Agendas of Meetings (as above)	Website Hard Copy - Parish Clerk Notice Boards	Free £0.05 A4 copy Free
Minutes of Meetings (as above) <i>(This will exclude information that is properly regarded as private to the Meeting)</i>	Website Hard Copy - Parish Clerk	Free £0.05 A4 copy
Reports presented to Council Meetings – <i>(This will exclude information that is properly regarded as private to the Meeting)</i>	Hard Copy - Parish Clerk	£0.05 A4 copy
Responses to Consultation Papers	Hard Copy - Parish Clerk	£0.05 A4 copy
Responses to Planning Applications	Hard Copy - Parish Clerk	£0.05 A4 copy

RUSTINGTON PARISH COUNCIL

Class 5 – Our policies and procedures

(Current written protocols, policies and procedures for delivering our services and responsibilities) (Current information only)

Policies and procedures for the conduct of Council business, the provision of services and the employment of staff:		
• Code of Members' Conduct	Website	Free
	Hard Copy - Parish Clerk	£0.05 A4 copy
• Council's Standing Orders	Website	Free
	Hard Copy - Parish Clerk	£0.05 A4 copy
• Financial Regulations	Website	Free
	Hard Copy - Parish Clerk	£0.05 A4 copy
• Staff Grievance Procedures	Hard Copy - Parish Clerk	£0.05 A4 copy
• Freedom of Information Act Policy & Publication Scheme	Hard Copy - Parish Clerk	£0.05 A4 copy
• Equal Opportunities Policy	Website	Free
• Recruitment of Ex-Offenders Policy	Hard Copy - Parish Clerk	£0.05 A4 copy
• Child Protection Policy	Hard Copy - Parish Clerk	£0.05 A4 copy
• Health & Safety Policy	Hard Copy - Parish Clerk	£0.05 A4 copy
• Staff Application Form	Hard Copy - Parish Clerk	£0.05 A4 copy
• Hall Hire Agreement	Hard Copy - Parish Clerk	£0.05 A4 copy
• Schedule of Charges (for the publication of information)	Hard Copy - Parish Clerk	£0.05 A4 copy
• Risk Assessment - Land, Buildings etc.	Website	Free
• Playgrounds Inspection Reports	Hard Copy - Parish Clerk	£0.05 A4 copy
• Complaints Procedure Policy	Hard Copy - Parish Clerk	£0.05 A4 copy
• Homeworking Policy	Website	£0.05 A4 copy
• Investment Policy	Hard Copy - Parish Clerk	£0.05 A4 copy
• Sickness & Absence Management Policy	Hard Copy - Parish Clerk	£0.05 A4 copy
• LGPS Employer Discretions Policy	Hard Copy - Parish Clerk	£0.05 A4 copy
• Redeployment and Redundancy Policy	Hard Copy - Parish Clerk	£0.05 A4 copy
• Safeguarding Policy	Hard Copy - Parish Clerk	£0.05 A4 copy
• Social Media Policy	Hard Copy - Parish Clerk	£0.05 A4 copy
• Statement of Intent as to Community Engagement	Hard Copy - Parish Clerk	£0.05 A4 copy
• Statement of Intent on Training	Hard Copy - Parish Clerk	£0.05 A4 copy
• Security Policy for the Correct Handling, Safekeeping and Disposal of Disclosure Information	Hard Copy - Parish Clerk	£0.05 A4 copy
• Use of CCTV Policy	Hard Copy - Parish Clerk	£0.05 A4 copy
• Website Policy & Guidance	Hard Copy - Parish Clerk	£0.05 A4 copy
• IT Communications & Monitoring Policy	Hard Copy - Parish Clerk	£0.05 A4 copy
• Data Protection Policy	Hard Copy - Parish Clerk	£0.05 A4 copy
• Information Security Policy	Hard Copy - Parish Clerk	£0.05 A4 copy



RUSTINGTON PARISH COUNCIL

Class 6 – Lists and Registers

(Currently maintained lists and registers)

Asset Register	Hard Copy - Parish Clerk	£0.05 A4 copy
Register of Members' Interests	Hard Copy - Parish Clerk Website	£0.05 A4 copy Free
Register of gifts and hospitality	Hard Copy - Parish Clerk	£0.05 A4 copy
Allotments Register	Hard Copy - Parish Clerk	£0.05 A4 copy
Contractors Listings	Hard Copy - Parish Clerk	£0.05 A4 copy
Suppliers Listings	Hard Copy - Parish Clerk	£0.05 A4 copy

Class 7 – The services we offer

(Information about the services we offer, including leaflets, guidance and newsletters produced for the public and businesses)

(Current information only)

Allotments	Website Hard Copy - Parish Clerk	Free £0.05 A4 copy
Community Centres	Website	Free
Parks, Playing Fields and Recreational Facilities	Website Hard Copy - Parish Clerk	Free £0.05 A4 copy
Seating, Litter Bins, Clocks, Memorials and Lighting	Website Hard Copy - Parish Clerk	Free £0.05 A4 copy
Bus Shelters	Website Hard Copy - Parish Clerk	Free £0.05 A4 copy

Contact details:-

Mrs Carole Ward

Clerk of the Council, Council Offices,

34 Woodlands Avenue, Rustington, West Sussex BN16 3HB

Tel: 01903 786420 Fax: 01903 788736

Email: caroleward@rustingtonpc.org

Website: www.rustingtonpc.org

SCHEDULE OF CHARGES

TYPE OF CHARGE	DESCRIPTION	BASIS OF CHARGE
Disbursement cost	Photocopying A4 Black and White £0.05 per sheet	Actual cost * £0.0038
	Postage £0.75	Actual cost of Royal Mail standard 2 nd class = 01/04/23 £0.75 2 nd class
Publications	£1.50 per copy per pre published document	£1.00 per copy

* Actual Cost incurred by Rustington Parish Council



Rustington Parish Council

HOMEWORKING POLICY

1. Policy
2. Scope of this policy
3. Safe working environment
4. Facilities and equipment
5. Hours of work
6. Potential conflicts of interest
7. Data protection
8. Insurance, mortgage or rental agreements

1. Policy

The Council recognises the advantages of home-based working although it doesn't suit everyone, and some job roles may not be appropriate to undertake at home. There may also be times, such as a Pandemic, when home-based working is the only option available in order to keep the Council functioning.

This policy describes the working arrangements and expectations that will apply if you work from home.

2. Scope of this policy

It applies to all staff who are home-based on occasion whether full time, part time or fixed term.

3. Safe working environment

Health and safety for home-based staff applies in the same way as office-based staff, insofar as is reasonably practicable, that you work in a safe manner and that you follow all health and safety instructions issued by the Council.

You must complete and submit a workstation risk assessment and ensure that this remains up-to-date. If you have any questions about the risk assessment, or if you identify any potential risks when carrying out the assessment, you should refer these to the Clerk in the first instance.

Some of the most important considerations include:-

- If possible, an area should be set aside from the rest of your living space to ensure that you are able to work from home without distractions
- Your home office should have adequate space for you to work safely and comfortably
- Your desk should be large enough to accommodate your equipment and paperwork
- You should have sufficient storage and your workspace should be organised so equipment is close to hand
- Your work area should be well lit, with natural lighting if possible
- Equipment and sockets should be situated to avoid potential trip hazards, and,
- You must also ensure that you visually check the cables of any electronic equipment supplied to you regularly and report any defects.

We reserve the right to visit you at home at agreed times for work-related purposes, including health and safety matters and to inspect, service or repair equipment (e.g. for PAT testing).

4. Facilities and equipment

The Council will provide you with the following equipment for you to work from home and we will maintain and replace these items when necessary.

- Laptop computer

It is your duty to ensure that proper care is taken of the equipment provided to you and to let the Clerk know of any need to maintain or replace the equipment. Should a risk assessment identify any further equipment that is necessary, please discuss this with the Clerk.

All equipment provided by the Council is for you to work safely and effectively at home and cannot be used for personal use by you or your family.

All equipment will belong to the Council and you will be required to return it promptly should you leave the Council's employment. If the Council is unable to make suitable arrangements, it may collect the equipment and any documents before your last day.

5. Hours of work

As a home-based worker, your Contract of Employment will specify the hours when we expect you to be at work and contactable by telephone or email. There may be times during the working day when you are not available in which case these should be flagged to the Clerk (or the Chair of the Council) with prior authorisation.

You must be mindful to take adequate rest breaks which should be, as a minimum:

- A break of at least 20 minutes during each working day over 6 hours,
- A daily rest break of at least 11 continuous hours, i.e. the time between stopping work one day and beginning work the next day, and,
- At least one complete day each week when no work is done.

6. Potential conflicts of interest

During your hours of work, the Council expects that your work environment enables you to work effectively and that you are not distracted by domestic matters. It is not appropriate to combine homeworking with caring for a dependant.

If there is an emergency and you need to attend to a non-work matter, then you should notify the Clerk.

7. Data protection

As a home-based worker you are responsible for keeping all documents and information associated with the council secure at all times. Specifically, homeworkers are under a duty to:

- Keep all documentation belonging to the Council in a secure place at all times except when in use,
- Set up and use a unique password for the laptop computer, and,
- Ensure that documents are saved to the server rather than the laptop computer's hard drive.

Furthermore, the laptop computer and other equipment provided by us must be used only for work-related purposes and must not be used by any other member of the family at any time or for any purpose.

If you have a telephone conversation where you are discussing confidential work matters, you should ensure that such calls take place in privacy to avoid inadvertent breach of confidentiality.

8. Insurance, mortgage or rental agreements

Whilst our Employer's Liability Insurance extends to home based staff, and any Council equipment installed in your home will also be covered, you should ensure that any agreement with your landlord or mortgage lender allows you to work from home, and that your Home Buildings and Contents Insurance will not be invalidated by you working from home.

This is a non-contractual procedure which will be reviewed from time to time.

Date of Policy: 16 March 2020

Approved by Full Council: 23 March 2020

Policy effective from: 24 March 2020

Reviewed: 22 March 2021

28 March 2022

27 March 2023

Date for next review: March 2024



Rustington Parish Council

EQUAL OPPORTUNITIES AND DIGNITY AT WORK POLICY

1. Introduction - The General Equality Duty

- 1.1 The Council is an equal opportunity employer and is fully committed to a Policy of treating all of its employees and job applicants equally. The Council will have due regard to the need to: eliminate unlawful discrimination, harassment and victimisation in all aspects of employment including recruitment and selection, promotion, transfer, opportunities for training, pay and benefits, other terms of employment, discipline, selection for redundancy and dismissal.
- 1.2 The Council is committed to advance equality of opportunity between people who share a protected characteristic and those who do not, and to foster good relations between people who share a protected characteristic and those who do not.
- 1.3 The Council extends this positive attitude in respect of equality and diversity to its contractors, service users, and the community at large. The Council is aware that in order to retain the confidence of the community it is important to reflect the makeup of its community within its workforce.

2. Operation

- 2.1 The Council will take all reasonable steps to employ, train and promote employees on the basis of their experience, abilities and qualifications without regard to age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race (including colour, nationality and ethnic or national origins), religion or belief, sex or sexual orientation. In this Policy, these are known as the "protected characteristics".
- 2.2 The Council is committed to creating a working environment free of bullying, harassment, victimisation and unlawful discrimination, promoting dignity and respect for all, and where individual differences and the contributions of all staff are recognised and valued.
- 2.3 All employees are responsible for conducting themselves in accordance with this Policy. The Council will not condone or tolerate any form of harassment, whether engaged in by employees or by outside third parties who do business with the Council, such as clients, customers, contractors and suppliers.
- 2.4 This Policy should be read in conjunction with the Council's Statement of Intent as to Community Engagement.
- 2.5 Employees have a duty to co-operate with the Council to make sure that this Policy is effective. Action will be taken under the Council's Disciplinary Procedure against any employee who is found to have committed an act of improper or unlawful discrimination, harassment, bullying or intimidation. Serious breaches of this Policy

will be treated as potential gross misconduct and could render the employee liable to a Summary Dismissal. Employees should also bear in mind that they can be held personally liable for any act of unlawful discrimination or harassment. Employees who commit serious acts of harassment may also be guilty of a criminal offence.

- 2.6 Employees should draw the attention of their Line Manager to suspected discriminatory acts or practices or suspected cases of harassment or bullying. Employees must not victimise or retaliate against any employee who has made allegations or complaints of discrimination or harassment or who has provided information about such discrimination or harassment. Such behaviour will be treated as potential gross misconduct in accordance with the Council's Disciplinary Procedure. All employees should support colleagues who suffer such treatment and make a complaint.
- 2.7 The Council will also take appropriate action against any third parties who are found to have committed an act of improper or unlawful harassment against its employees.
- 2.8 This Policy and the associated arrangements shall operate in accordance with statutory requirements. In addition, full account will be taken of any guidance or Codes of Practice issues by the Equality and Human Rights Commission, any Government Departments, and any other statutory bodies.

3. Direct Discrimination

- 3.1 Direct discrimination occurs when, because of one of the protected characteristics, a job applicant or an employee is treated less favourably than other job applicants or employees.
- 3.2 The treatment will still amount to direct discrimination even if it is based on the protected characteristic of a third party with whom the job applicant or employee is associated and not on their own protected characteristic.
- 3.3 It can include cases where it is perceived that a job applicant or an employee has a particular protected characteristic when in fact they do not.
- 3.4 The Council will take all reasonable steps to eliminate direct discrimination in all aspects of employment.

4. Indirect Discrimination

- 4.1 Indirect discrimination is treatment that may be equal in the sense that it applies to all job applicants or employees but which is discriminatory in its effect on, for example, one particular sex or racial group.
- 4.2 Indirect discrimination occurs when there is applied to the job applicant or employee a Provision, Criterion or Practice (PCP) which is discriminatory in relation to a protected characteristic of the job applicant's or employee's.

A PCP is discriminatory in relation to a protected characteristic of the job applicant's or employees if:

- i) It is applied, or would be applied, to persons with whom the job applicant or employee does not share the protected characteristic;
- ii) The PCP puts, or would put, persons with whom the job applicant or employee shares the protected characteristic at a particular disadvantage when compared with persons with whom the job applicant or employee does not share it;
- iii) It puts, or would put, the job applicant or employee at that disadvantage, and;
- iv) It cannot be shown by the Council to be a proportionate means of achieving a legitimate aim.

4.3 The Council will take all reasonable steps to eliminate indirect discrimination in all aspects of employment.

5. Recruitment, Advertising and Selection

5.1 The recruitment process will be conducted so that the most suitable person for the job (in terms of relevant experience, abilities and qualifications) is selected. The Council is committed to providing equal opportunities at all stages of recruitment and selection.

5.2 Advertisements will aim to encourage applications from all suitably qualified and experienced people. When advertising job vacancies, the Council will, as far as reasonably practicable:

- i) Ensure advertisements are not confined to those areas or publications which would exclude the numbers of applicants with a particular protected characteristic.
- ii) Avoid setting any unnecessary provisions or criteria which would exclude a higher proportion of applicants with a particular protected characteristic.

5.3 Where vacancies may be filled by promotion or transfer, they will be published to all eligible employees in such a way that they do not restrict applications from employees with a particular protected characteristic.

5.4 However, where, having regard to the nature and context of the work, having a particular protected characteristic is an occupational requirement and that occupational requirement is a proportionate means of achieving a legitimate aim, the Council will apply that requirement to the job role and this may therefore be specified in the advertisement.

5.5 The selection process will be carried out consistently for all jobs at all levels. All applications will be processed in the same way. The staff responsible for shortlisting, interviewing and selecting candidates will be clearly informed of the selection criteria and of the need for their consistent application. Person Specifications and Job

Descriptions will be limited to those requirements that are necessary for the effective performance of the job. Wherever possible, all applicants will be interviewed by at least two interviewers and all questions asked of the applicants will relate to the requirements of the job. The selection of new staff will be based on the job requirements and the individual's suitability and ability to do, or to train for, the job in question.

- 5.6 With disabled job applicants, the Council will have regard to its duty to make reasonable adjustments to work provisions, criteria and practices or to physical features of work premises or to provide auxiliary aids or services in order to ensure that the disabled person is not placed at a substantial disadvantage in comparison with persons who are not disabled.
- 5.7 If it is necessary to assess whether personal circumstances will affect the performance of the job (for example, if the job involves unsociable hours or extensive travel), this will be discussed objectively, without detailed questions based on assumptions about any of the protected characteristics.

6. Training and Promotion

- 6.1 The Council will train all Line Managers in the Council's Policy on Equal Opportunities and in helping them identify and deal effectively with discriminatory acts or practices or acts of harassment or bullying. Line Managers will be responsible for ensuring they actively promote equal opportunity within the departments for which they are responsible.
- 6.2 The Council will also, as far as practicable, provide training to all employees to help them understand their rights and responsibilities in relation to equal opportunities and dignity at work and what they can do to create a work environment that is free from discrimination, bullying and harassment.

7. Terms of Employment, Benefits, Facilities and Services

- 7.1 All terms of employment, benefits, facilities and service will be reviewed from time to time, in order to ensure that there is no unlawful direct or indirect discrimination because of one or more of the protected characteristics.

8. Equal Pay

- 8.1 The Council is committed to equal pay in employment. It believes that all employees should receive equal pay for like work, work rated as equivalent or work of equal value. In order to achieve this, the Council will endeavour to maintain a pay system that is transparent, free from bias and based on objective criteria.

9. Bullying and Harassment

- 9.1 This Policy covers bullying and harassment relating to protected characteristics in the workplace and in any work-related setting outside the workplace, for example, during

business trips and at work-related social events. This should also be considered in line with other relevant Council policies.

- 9.2 Bullying is offensive or intimidating behaviour or an abuse or misuse of power which undermines or humiliates an employee.
- 9.3 An employee harasses another employee if they engage in unwanted conduct related to a protected characteristic or to a perceived protected characteristic, and the conduct has the purpose or effect of violating the other employee's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment for that other employee.
- 9.4 An employee also harasses another employee if they engage in unwanted conduct of a sexual nature, and the conduct has the purpose or effect of violating the other employee's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment for that other employee.
- 9.5 Finally, an employee harasses another employee if they or a third party engage in unwanted conduct of a sexual nature or that is related to gender reassignment or sex, the conduct has the purpose or effect of violating the other employee's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment for that other employee, and because of that other employee's rejection of or submission to the conduct, they treat that other employee less favourably than they would treat them if they had not rejected, or submitted to, the conduct.
- 9.6 The unwanted conduct will still amount to harassment if it is based on the protected characteristic of a third party with whom the employee is associated and not on the employee's own protected characteristic, or if it was directed at someone other than the employee, or even at nobody in particular, but they witnessed it. In addition, harassment can include cases where the unwanted conduct occurs because it is perceived that an employee has a particular protected characteristic, when in fact they do not.
- 9.7 Conduct may be harassment whether or not the person intended to offend. Something intended as a "joke" or as "office banter" may offend another person. This is because different employees find different levels of behaviour acceptable and everyone has the right to decide for themselves what behaviour they find acceptable to them.
- 9.8 Behaviour which a reasonable person would realise would be likely to offend an employee will always constitute harassment without the need for the employee having to make it clear that such behaviour is unacceptable, for example, touching someone in a sexual way. With other forms of behaviour, it may not always be clear in advance that it will offend a particular employee, for example, office banter and jokes. In these cases, the behaviour will constitute harassment if the conduct continues after the employee has made it clear, by words or conduct, that such behaviour is unacceptable to him or her. A single incident can amount to harassment if it is sufficiently serious.
- 9.9 This Policy also covers people who are perceived to have an anti-harassment protected characteristic, e.g. a person being bullied because they are perceived to be gay even though in fact they are not.

10. Examples

- 10.1 Bullying and harassment may be verbal, non-verbal, written or physical.
- 10.2 Examples of unacceptable behaviour include, but are not limited to, the following: unwelcome sexual advances, requests for sexual favours, other conduct of a sexual nature, subjection to obscene or other sexually suggestive or racist comments or gestures, or other derogatory comments or gestures related to an anti-harassment protected characteristic.
- 10.3 The offer of rewards for going along with sexual advances or threats for rejecting sexual advances.
- 10.4 Jokes or pictures of a sexual, sexist or racial nature or which are otherwise derogatory in relation to a protected characteristic.
- 10.5 Demeaning comments about an employee's appearance.
- 10.6 Questions about an employee's sex life.
- 10.7 The use of nick names related to a protected characteristic, picking on or ridiculing an employee because of an anti-harassment protected characteristic.
- 10.8 Isolating an employee or excluding him or her from social activities or relevant work-related matters because of a protected characteristic.

11. Reporting Complaints

- 11.1 All allegations of discrimination or harassment will be dealt with seriously, confidentially and speedily. The Council will not ignore or treat lightly grievances or complaints of discrimination or harassment from employees.
- 11.2 If an employee wishes to make a complaint of discrimination, they should use the Council's Grievance Procedure.
- 11.3 With cases of harassment, while the Council encourages employees who believe they are being harassed or bullied to notify the offender (by words or by conduct) that his or her behaviour is unwelcome, the Council also recognises that actual or perceived power and status disparities may make such confrontation impractical. In the event that such informal direct communication is either ineffective or impractical, or the situation is too serious to be dealt with informally, employees should follow the procedure as set out in the Council's Grievance Procedure.
- 11.4 Any employee who is found to have discriminated against or harassed another employee in violation of this Policy will be subject to disciplinary action under the Council's Disciplinary Procedure. Such behaviour may be treated as gross misconduct and could render the employee liable to summary dismissal. In addition, Line Managers who had knowledge that such discrimination or harassment had occurred in the Team for which they hold line management responsibility but who had taken no action to eliminate it will also be subject to disciplinary action under the Council's Disciplinary Procedure.

12. Related Policies and Arrangements

- 12.1 All employment policies and arrangements have a bearing on equality of opportunity. The Council undertakes to review these policies regularly and to remove any discriminatory elements.

13. Monitoring Equal Opportunity and Dignity at Work

- 13.1 The Council will regularly monitor the effects of selection decisions and personnel and pay practices and procedures in order to assess whether equal opportunity and dignity at work are being achieved. This will also involve considering any possible indirectly discriminatory effects of its working practices.
- 13.2 If changes are required, the Council will implement them. The Council will also make reasonable adjustments to its standard working practices to overcome substantial disadvantages caused by disability.

(Adopted 26/04/2021)
(Reviewed March 2023)