



Seaford Town Council

**Seaford Town Council Extraordinary Full Council Agenda – 18 March 2026**

**To the Members of the Full Council**

Councillors S Adeniji, S Ali, L Boorman, C Bristow, R Buchanan, S Dubas, S Dunn, F Hoareau, O Honeyman, R Honeyman, J Lord, S Markwell, O Matthews, J Meek, G Rutland, L Stirton, R Stirton, I Taylor, L Wallraven and M Wearmouth

An **Extraordinary meeting** of the **Full Council** will be held in the **Council Chambers, 37 Church Street, Seaford, BN25 1HG** on **Wednesday, 18 March 2026** at **7.00pm**, which you are summoned to attend.

Steve Quayle  
Town Clerk  
9 March 2026

**PLEASE NOTE:**

- **PUBLIC ARRIVAL TIME IS BETWEEN 6.45PM – 6.55PM, AFTER WHICH THE FRONT DOOR WILL BE LOCKED AND PUBLIC WILL NOT BE ABLE TO GAIN ACCESS TO THE MEETING**
- The meeting will be recorded and uploaded to the Town Council's YouTube channel shortly after the meeting
- See the end of the agenda for further details of public access and participation
- Ahead of the meeting, the Mayor will invite those in attendance to join her in a one minute reflection
- Councillor queries on agenda items should be reserved for the meeting so the answer and any subsequent points are shared with all councillors. If however a councillor has a question that officers may need to know in advance to prepare a response, please send this through the contact officer of the report so an answer can be prepared to be shared verbally at the meeting, rather than in advance of the meeting via email

## AGENDA

### 1. Apologies

To consider other apologies for absence for this meeting.

### 2. Disclosure of Interests

To deal with any disclosure by Members of any disclosable pecuniary interests and interests other than pecuniary interests, as defined under the Seaford Town Council Code of Conduct and the Localism Act 2011, in relation to matters on the agenda.

### 3. Public Participation

To deal with any questions, or brief representations, from members of the public physically in the meeting room, in accordance with relevant legislation and Seaford Town Council Policy.

### 4. Petitions

In accordance with the Town Council Petitions Policy, this is a standard agenda item to facilitate any public petitions being presented to, and noted by, Full Council. Please note, that this would not prompt a discussion on the petition at this meeting.

### 5. [Adoption of Updated Purchase Ordering and Payment for Goods and Services Policy](#) \*deferred from 29 January Full Council meeting\*

To consider report 146/25 presenting the recommendation from the Finance & General Purposes Committee to adopt the revised Purchase Ordering and Payment for Goods and Services Policy (pages 6 to 21).

### 6. [Adoption of a Sexual Harassment Policy](#) \*deferred from 29 January Full Council meeting\*

To consider report 147/25 presenting the recommendation from the Personnel Committee to adopt the new Sexual Harassment Policy (pages 22 to 36).

### 7. [Adoption of an Absence Management Policy](#) \*deferred from 29 January Full Council meeting\*

To consider report 148/25 presenting the recommendation from the Personnel Committee to adopt the new Absence Management Policy (pages 37 to 50).

### 8. [Adoption of a Menopause Policy](#) \*deferred from 29 January Full Council meeting\*

To consider report 149/25 presenting the recommendation from the Personnel Committee to adopt the new Menopause Policy (pages 51 to 63).

**9. Review and Classification of the Staff Handbook \*deferred from 29 January Full Council meeting\***

To consider report 162/25 presenting the recommendation from the Personnel Committee to adopt the revised Staff Handbook and to henceforth disapply the Staff Handbook from being considered as a 'Policy' (pages 64 to 79).

**10. Revisions to the 2026 – 2027 Meeting Timetable**

To consider report 182/25 seeking approval of revisions to the 2026 – 2027 Meeting Timetable (pages 80 to 81).

**11. Annual Review of the Corporate Risk Register 2025 – 2026**

To consider report 185/25 review and approve the Town Council's Corporate Risk Register and subsequent action plans (pages 82 to 99).

**12. Annual Review of Internal Controls 2025 – 2026**

To consider report 186/25 seeking Full Council's review and approval of the Town Council's Internal Controls (pages 100 to 107).

**13. Adoption of the Annual Investment Strategy 2026 – 2027**

To consider report 187/25 presenting the Annual Investment Strategy 2026 – 2027 for adoption (pages 108 to 114).

**14. Review of the Financial Regulations Policy**

To consider report 188/25 presenting the review of the Financial Regulations Policy to Full Council for adoption (pages 115 to 148).

**15. Exclusion of the Press & Public**

The Chair will move that in accordance with the Public Bodies (Admission to Meetings) Act 1960, the press and public be excluded from the meeting during the discussion on the next items of business for the reasons as set out below.

The resolutions of the items will be recorded publicly in the minutes of this meeting.

*The Proper Officer considers that discussion of the following items is likely to disclose exempt information as defined in the Local Government Act 1972 and Data Protection legislation and may therefore need to take place in private session. The exempt information reasons are shown alongside each item below.*

*Furthermore, in relation to paragraph 10 of Schedule 12A, it is considered that the public interest in maintaining exemption outweighs the public interest in disclosing the information.*

## **16. Update on Land EXEMPT**

To consider exempt report 199/25 updating Full Council on a land situation, and seeking Full Council's resolution for the proposals contained within the report (exempt pages).

## **17. Update on Staffing Situation EXEMPT**

To consider exempt report 200/25 updating Full Council on a staffing situation, and seeking Full Council's resolution for one of the positions contained within the report (exempt pages).

## **AGENDA NOTES**

### **For further information about items on this Agenda please contact:**

Steve Quayle, Town Clerk, 37 Church Street, Seaford, East Sussex, BN25 1HG

Email: [meetings@seafordtowncouncil.gov.uk](mailto:meetings@seafordtowncouncil.gov.uk)

Telephone: 01323 894 870

### **Circulation:**

All Town Councillors and registered email recipients.

### **Public Access:**

Members of the public looking to access this meeting will be able to do so by:

1. Attending the meeting in person.

Due to health and safety restrictions, the number of public in attendance will be limited. The Town Council therefore asks that you contact

[meetings@seafordtowncouncil.gov.uk](mailto:meetings@seafordtowncouncil.gov.uk) or 01323 894 870 to register your interest in attending at least 24 hours before the meeting.

Spaces will be assigned on a first come, first served basis.

Please note that if you don't register and just attempt to turn up at the meeting, this could result in you not being able to attend if there is no space.

OR

2. Watching the recording of the meeting on the [Town Council's YouTube channel](#) , which will be uploaded after the meeting has taken place.

### **Public Access to the Venue:**

If you are attending the meeting in person, please arrive between 6.45 – 6.55pm where you will be shown into the meeting for a 7.00pm start.

Please note that the front door of the building will be locked at 6.55pm and remain locked during the meeting for security reasons. As such, if you arrive after this time, you will not be able to access the meeting.

When members of the public are looking to leave, they must be escorted out of the building by a Town Council officer. There is also a signposted back door which can be exited through if required.

Entrance through the rear fire escape of the building will not be allowed.

There is a lift for those requiring it to access the first floor. Please note that motorised scooters cannot be brought into the lift. Electric and other wheelchairs can be accommodated but there is a maximum weight limit of 400kg.

### **Public Participation:**

Members of the public looking to participate in the public participation section of the meeting must do so in person, by making a verbal statement during the public participation section of the meeting.

Below are some key points for public participation in the meeting:

1. Your statement should be relevant to the activities of the Town Council.
2. You will only be able to speak at a certain point of the meeting; the Chair of the meeting will indicate when this is.
3. You do not have to state your name if you don't want to.
4. If you are unsure of when best to speak, either query this with an officer/councillor ahead of the meeting or raise your hand during the public participation item of the meeting and ask the Chair – they will always be happy to advise.
5. When the Chair has indicated that it is the part of the meeting that allows public participation, raise your hand and the Chair will invite you to speak in order.
6. Statements by members of the public are limited to four minutes and you don't automatically have the right to reply. The Chair may have to cut you short if you overrun on time or try to speak out of turn – this is just to ensure the meeting stays on track.
7. Where required, the Town Council will try to provide a response to your statement but if it is unable to do so at the meeting, may respond in writing following the meeting.
8. Members of the public should not speak at other points of the meeting.
9. A summarised version of your statement, but no personal details, will be recorded in the minutes of the meeting.

## **Public Comments**

Members of the public looking to submit comments on any item of business on the agenda can do so in writing ahead of the meeting and this will be circulated to all councillors.

Comments can be submitted by email to [meetings@seafordtowncouncil.gov.uk](mailto:meetings@seafordtowncouncil.gov.uk) or by post to the Town Council offices.



## Seaford Town Council

<b>Report No:</b>	146/25 – deferred from 29 January 2026
<b>Agenda Item No:</b>	5
<b>Committee:</b>	Full Council - Extraordinary
<b>Date:</b>	18 March 2026
<b>Title:</b>	Adoption of Updated Purchase Ordering and Payment for Goods and Services Policy
<b>By:</b>	Darryl Keech, Deputy Town Clerk & Responsible Financial Officer (RFO)
<b>Purpose of Report:</b>	To present the recommendation from the Finance & General Purposes Committee to adopt the revised Purchase Ordering and Payment for Goods and Services Policy

**N.B. This is the report that was presented to 29 January Full Council but was adjourned due to time constraints without being considered – Councillors should note there has been an addition to this report and the appendix since it was presented to the Finance & General Purposes Committee in December and to Full Council in January (see Section 2.4 of this report).**

<b>Actions</b>
<b>Full Council is advised:</b>
<ol style="list-style-type: none"><li>1. To consider the revised Purchase Ordering and Payment for Goods and Services Policy, noting the recommendation for adoption by the Committee.</li><li>2. To consider the additional change to the policy being recommended by officers.</li><li>3. To move to a vote on the motions below</li></ol>

<b>Recommendations</b>
<b>Full Council is recommended:</b>
1. To note the contents of the report. 2. To adopt the revised Purchase Ordering and Payment for Goods and Services Policy, as presented within the report.



## 1. Introduction

- 1.1 The existing Purchase Ordering and Payment for Goods and Services Policy was adopted in May 2022 and is due for review.
- 1.2 The policy sets out the procedures in place to ensure that the Town Council's ordering and payment processes are carried out in a compliant, transparent and consistent manner.
- 1.3 This report is now presenting the revised Purchase Ordering and Payment for Goods and Services Policy that has been recommended to Full Council for adoption by the Finance & General Purposes (F&GP) Committee.

## 2. Information

- 2.1 The proposed policy document is presented at **Appendix A**. The current version of the policy is available to view on the [Town Council's website](#) (see the Finance policy section).
- 2.2 Following this policy being identified as out of date in a recent internal audit, officers updated the policy document to reflect the revised 2025 Financial Regulations, the revised Town Council staff structure and the most effective working practices under this structure, and ultimately ensure that the policy complies within the requirements of the Annual Governance and Accountability Return (AGAR).
- 2.3 The revised policy was considered by the F&GP Committee in December 2025, which has recommended that Full Council adopt the policy as presented.
- 2.4 Elsewhere on this agenda is a review of the Town Council's Financial Regulations Policy (agenda item 14). This policy has had extensive work carried out to the procurement table at Appendix 1, ensuring greater clarification of the Town Council's procurement thresholds and the associated process. As it stands, the Purchase Ordering and Payment for Goods and Services Policy makes reference to procurement thresholds

and processes but not to the extent that the Financial Regulations do. It is officers' opinion that this information should remain within the Financial Regulations but be removed from the Purchase Ordering and Payment for Goods and Services Policy to avoid duplication and the associated risk of contradictory statements between policies or any confusion over process. New Section 5.9 of the revised Purchase Ordering and Payment for Goods and Services Policy therefore signposts the reader to the Financial Regulations for the required information.

**2.5** Should members wish to revisit the report presented to the F&GP Committee, this can be viewed on the [Town Council's website](#) (page 186).

**2.6** Upon adoption, the revised policy will be circulated to all staff and councillors and published on the Town Council's website. The implementation of this revised policy will be fairly straightforward, as this largely reflects the new working practices resulting from the revised staff structure that has been implemented during 2025. Relevant managers will work with teams to ensure any changes in the policy are embedded.

### **3. Financial Appraisal**

**3.1** There are no direct financial implications as a result of this report.

### **4. Contact Officer**

**4.1** The Contact Officer for this report is Darryl Keech, Deputy Town Clerk & RFO.



SEAFORD  
TOWN  
COUNCIL



# PURCHASE ORDERING AND PAYMENT FOR GOODS & SERVICES POLICY

*This policy sets out the procedures in place to ensure that the Town Council's ordering and payment processes are carried out in a compliant, transparent and consistent manner*

*"Working with our community to secure Seaford's best future"*

## Policy Status

<b>Version</b>	0.2	<b>Last Review Date</b>	May 2022
<b>Adopted Date</b>	TBC	<b>Next Review Date</b>	TBC
<b>Review Period</b>	Three yearly	<b>Approving Body</b>	Full Council

## Version History

<b>Date</b>	<b>Version</b>	<b>Approval</b>	<b>Status</b>
May 2022	0.1	Full Council	Adopted Policy

## Related Policies and Other References

<b>Policy Reference Code</b>	<b>Policy Name</b>
[insert code]	Scheme of Delegation to Officers Policy
[insert code]	Financial Regulations
[insert code]	Standing Orders

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11.0	Direct Debit Invoices and Payments
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13.0	Accounting for Petty Cash

## **1. Introduction**

- 1.1. This policy sets out the Council's arrangements for ordering, receiving, authorising and subsequently paying for the supply of goods, materials, services and works to the Council. The policy sets out the detailed rules and procedures around the Council's purchase ordering system and payments.
- 1.2. The Policy encompasses the following areas:
  - Raising of purchase orders for goods, services or works
  - Receiving and checking of goods, services or works upon delivery
  - Certification of orders and authorisation of expenditure
  - Accounting for payments for goods, services or works
  - Direct debit payments
  - Use of the Council debit cards
  - Petty cash arrangements
- 1.3. This policy provides the detail behind the overall financial framework as set out in relevant sections of the Council's approved Financial Regulations, and in the Financial Control and Procurement section of the Standing Orders which set out the framework for the procurement of all works, goods, materials and services and the Council's tendering and contract procedures.
- 1.4. The Responsible Financial Officer (RFO) is ultimately responsible for all systems and procedures in relation to the ordering and payment for goods, services and works provided to the Council with the Finance Manager responsible for all day-to-day management.

## **2. Links to Strategy Programme 2025-2027 Objectives**

- 2.1. This policy contributes to the strategy of 'Financial Management'

## **3. Aims of the Policy**

- 3.1. The aim of the policy is to supplement the Financial Regulations and Standing Orders for Financial Controls and Procurements by setting out detailed procedures and controls for the ordering and the authorisation of expenditure on the supply of goods, services and works to the Council.
- 3.2. In particular, the policy aims to ensure that:
  - Purchase orders are raised only by authorised officers
  - Orders are placed only when sufficient budget provision exists
  - Appropriate checks are made upon delivery of goods, services or works to enable the effective authorisation of the expenditure

- Invoices received from creditors are properly checked for cost, arithmetic, VAT, etc. prior to release for payment
  - Invoices are certified for payment only by an authorised officer
  - Systems are in place for the effective checking and authorisation of regular payments and direct debits
  - Robust procedures are in place for the use of petty cash
  - Robust systems are in place for the use of the Council's debit cards
  - Creditors are paid on time, within the relevant payment terms
  - All expenditure is properly and accurately accounted for
- 3.3. The policy applies to all Council officers with responsibility for ordering goods, services and works, and for verifying and authorising associated expenditure. It also applies to officers in the Finance team who manage the purchase ordering system and who are responsible for checking, processing, paying and accounting for all expenditure.

#### **4. Purchase Order Responsibilities**

- 4.1. The key principle of separation of duties must be observed, as far as is practicable within the staffing resources available, in connection with the following areas of ordering and purchasing:
- (a) The duty of ordering the goods, services and works
  - (b) The duty of receiving the goods, services and works
    - The duty of checking invoices received for payment and authorising expenditure
    - The duty of payment of invoices
    - The duty of recording and reconciling expenditure in the Council's financial management system
- 4.2. Responsibility for raising orders for goods, services and works, receiving those goods, services and works and checking invoices received from suppliers for payment in respect of those goods, services and works, lies with the Operational and/or Strategic Management Teams.
- 4.3. It is important to note that in the application of the following procedures for purchase ordering, and in particular the requirement for separation of duties as set out above, there is an acceptance that due to, operational demands and service delivery requirements, full adherence to this procedure may not always be possible.
- 4.4. This will be taken into account during the audit of procedures in each team by the Council's Internal Auditor. However, all managers must ensure as far as possible that one officer does not take part in all aspects of ordering, receiving and certifying purchases.

- 4.5. Responsibility for the payment of all invoices for goods, services and works supplied to the Council and for recording and reconciling expenditure in the Council's financial management system lies with the Finance team. All invoices received from suppliers will in the first instance be received and checked by the Finance team.
- 4.6. The Finance team is responsible for the following procedures:
- Setting up new suppliers on the computerised RBS Omega Accounts Package
  - Entering all purchase invoices onto the purchase ledger
  - Checking the calculation and arithmetic of amounts due
  - Ensuring the correct VAT treatment and calculation
  - Ensuring the correct coding of the expenditure
  - Ensuring payment of creditors within the payment terms
  - Reconciliation of expenditure through the purchase ledger, cash books and bank statements

## **5. Ordering Goods, Services and Works**

- 5.1. An official purchase order must be raised by an authorised officer for every supply of all goods, services and works to the Council with the exception of the following:
- Regular payments such as utilities costs, telephones etc.
  - Payments made by direct debit or standing order
  - Goods, services or works of an emergency nature
  - One off purchases made using a debit card
  - Services for which a formal contract has been entered into
  - Petty cash purchases
- 5.2. The approved authorised officers with responsibility for raising and certifying purchase orders are as follows:
- Town Clerk
  - Deputy Town Clerk & RFO
  - Head of Place
  - Operations & Facilities Manager
  - HR & OD Manager
  - Community Engagement & Democratic Services Manager
  - Golf Course Manager
  - Deputy Course Manager (up to £500)
  - Finance Manager (only in the absence of no other duly authorised officer; to maintain segregation of duties as they are responsible for approving payments and accounting for expenditure)

- 5.3. The above officers only have the authority to sign a Purchase Order if the expenditure is within the approved budget or has been approved by the relevant committee.
- 5.4. In cases of serious risk to the delivery of Town Council services or to public safety on Town Council premises, the Town Clerk may authorise expenditure of up to £10,000 excluding VAT on repair, replacement or other work that in their judgement is necessary, whether or not there is any budget for such expenditure. The Town Clerk shall report such action to the Mayor of the Town Council as soon as practicable thereafter. (Financial Regulation 5.15).
- 5.5. All Purchase Orders over £2,000 must be countersigned by the Town Clerk or RFO.
- 5.6. Completed Purchase Orders must include enough detail i.e. not just what is being ordered but what it is being used for, using the description field on the order to enable proper checking of the subsequent invoice. If multiple orders are being placed, each individual item or set of items must be shown on a separate line on the order.
- 5.7. Purchase Orders must be coded to the correct account code and cost centre using the Council's budget book approved coding list. These codes determine which budget the expenditure is to be charged against, and authorised officers should ensure that only codes relating to their own responsible budget area are used, unless with the knowledge and acceptance from other budget managers. Officers must check that there are sufficient funds remaining within the appropriate budget. If there are not sufficient funds within the appropriate budget, the officer should speak to the RFO or Finance Manager in the first instance.
- 5.8. Suppliers must be supplied with the relevant purchase order number and a copy of the order forwarded if required. The supplier should be requested to quote the Council's official order number on the invoice relating to the order placed. The purchase order should then be forwarded to the Finance team and placed in the Live File.
- ~~5.9. In accordance with the Financial Regulations (Regulation 5) Procurement, when the Council enters into a contract of more than £3,599 (including VAT) in value and no greater than £29,999 (including VAT) for the supply of goods or materials or for the execution of works or specialist services, the Town Clerk or RFO should check that three quotations have been obtained, where possible. Contracts over £30,000 (including VAT) are subject to the Procurement Act 2023. The contract should be listed on Find a Tender.~~
- ~~5.10. Where an Authorised Officer proposes to enter into a contract of more than £30,000 (including VAT), a project plan and financial plan will be~~

~~brought to the Town Clerk or RFO for consideration before seeking tenders.~~

~~5.11.5.9.~~ Please refer to Appendix 1 of the Financial Regulations Tender Process and Procurement Table for ~~more~~ detailed information on the financial procurement thresholds and the associated process and approval requirements.

## 6. Receiving Goods, Services and Works

- 6.1. In order to maintain an appropriate level of internal control and ensure value for money, the duties of ordering, receiving and certifying goods and services should, wherever practicable, be shared between more than one officer. It is recognised, however, that operational requirements may mean that full separation cannot always be achieved.
- 6.2. A straightforward way to achieve separation is to ensure that, where practicable, the officer certifying the invoice for payment is not the same officer who raised the purchase order. In many cases, the officer who raises the order will also be the most appropriate person to receive and check the goods, services or works, given their knowledge of what was ordered.
- 6.3. Where the goods are to be delivered to the Council premises, the receiving officer should examine the goods at the point of delivery, check all items against the delivery notes or original order and then sign, whether this is manually or electronically, only for those items present. The officer must then ensure that the goods are stored in a secure area.
- 6.4. Signed delivery notes or goods received notes should be forwarded to the appropriate authorising officer to enable the proper certification of purchase orders when the invoice is subsequently received.

## 7. Certification of Purchase Orders

- 7.1. The duty of certifying purchase orders, and therefore authorising expenditure, should, wherever practicable, be undertaken by an authorised officer who has not been solely responsible for both ordering and receiving/checking the goods or services. It is recognised, however, that this may not always be achievable, particularly for specialist or lower-value purchases. In all cases, managers must ensure that appropriate scrutiny is applied before expenditure is authorised.
- 7.2. Wherever possible, certification of purchase orders should be made by reference to the signed delivery note, or other proof that the goods,

services or works have been received, delivered in the correct quantity and to an acceptable quality and standard. It is acknowledged that in a minority of cases, this assurance may be based on the knowledge and professional judgement of the certifying officer, rather than physical verification.

- 7.3. Purchase orders should be part certified where only part of the goods, services or works have been received or where the Council has only been part invoiced for the goods, services or works.
- 7.4. Certification of a purchase order by an authorised officer, confirms that the goods, services or works have been received as per the original order and to an acceptable standard and quality, and that the officer accepts responsibility for the subsequent expenditure.
- 7.5. There should normally be no instances where a single officer is solely responsible for all three stages of the process set out in Sections 5, 6 and 7 (ordering, receiving/checking and certifying). Where circumstances mean this cannot reasonably be avoided, the RFO or Finance Manager should provide an additional level of review by acting as the final certifying officer when the invoice is authorised for payment.

## **8. Invoice Processing and Authorisation**

- 8.1. The process for receiving, checking and processing for payment of all invoices received from suppliers, service providers and contractors, and accounting for the subsequent expenditure is split between the Finance team and the authorised officer within the relevant team.
- 8.2. All invoices to the Town Council are passed to the Finance team upon receipt.
- 8.3. The Finance Officer will first separate invoices between those for which a purchase order has been raised, and those which relate to direct debit payments. The procedures in respect of direct debits are set out in Section 11 of this Policy.
- 8.4. Invoices are then matched with the corresponding purchase order. These matched invoices are scanned on a weekly basis and emailed in one batch to all the relevant operational manager for approval.
- 8.5. Each operational manager will reply to the email to confirm approval of all invoices relating to their area. This confirmation is saved separately on the Council's server as part of the audit trail.
- 8.6. Where there is a variation between the purchase order and the invoice, the authorising officer should arrange for the purchase order to be amended and countersigned, once the variation has been verified as correct, in liaison with the Finance team.

- 8.7. The batch is then reviewed by either the Finance Manager or the RFO for final approval prior to processing.
- 8.8. Any invoices in dispute should be notified to the Finance team and held back by the relevant authorising officer until the issue is resolved.

## **9. Payment of Invoices and Accounting for Expenditure**

- 9.1. The process of paying invoices and accounting for expenditure for all creditors is the responsibility of the Finance team and is therefore kept completely separate from the purchase order process.
- 9.2. Once the invoices have been received back from the authorising officers, the Finance Officer will undertake a number of final checks on the invoices including checking arithmetical accuracy, coding of the expenditure and the calculation of any VAT.
- 9.3. The Finance Officer will then input the invoices on the RBS Omega Accounts System.
- 9.4. The invoices will then be scheduled for inclusion in the next weekly payment run, in accordance with the agreed payment terms for each supplier.
- 9.5. Payments to creditors are made primarily by BACS transfer, which the Finance team actively encourages as it is quicker and more cost-effective than payment by cheque. Cheque payments will only be made where specifically requested or required by the supplier.
- 9.6. All payments run, and supplier accounts are reconciled on a monthly basis, and all expenditure is checked and verified against supplier statements, the cash book and bank reconciliations. Internal Audit checks are also undertaken on the purchase order system and creditors payments.

## **10. BACs and Cheque Payment Authorisation**

- 10.1. Each week, prior to the creditors payment run, the Finance Officer will provide the Finance Manager with a copy of the 'Proposed Payment of Invoices' list produced from the RBS Omega Accounts System. Copies of all source documents such as supplier invoices and other similar requests making up the payment run will be attached.
- 10.2. The Finance Manager is responsible for undertaking a final check of the invoices due for payment, including querying any invoices or payments which look unusual.
- 10.3. The 'Proposed Payment of Invoices' list including all source documents will be presented to the RFO or Finance Manager and two Councillors for approval. Each will check and sign the Authorisation Sheet attached to the report.

- 10.4. The Finance Officer will process the approved payments from the Council's Co-operative Bank Account by using the Co-Operative Bank's Financial Director (FD) Online banking system and entering them as payment requests.
- 10.5. The Finance Manager (or in their absence the RFO) will then make a final check that the payment requests have been entered correctly and continue to approve. Following this approval, the suppliers will be paid by immediate payment (or by 'future dated payment' if necessary).
- 10.6. The Approved Authorised Users with access to the online bank account, Financial Director (FD) Online are as follows:
  - RFO
  - Finance Manager
  - Finance Officer
- 10.7. In the interest of security, it should be noted that whilst the Finance Officer has access to the Council's online banking system, their function only allows the creation of payments, and they are physically unable to authorise any payments. Whilst the RFO and Finance Manager both have the capability and access to create or authorise payments, their function only allows the authorisation of a payment created by a separate user. No single user can create and authorise any payment and there will always be the need for at least two users to complete a payment transaction.
- 10.8. A token is required each time the online banking system is accessed. Each user has their own token with their own unique log on and passcode. These are held by each individual in a secure place.
- 10.9. Any changes to the operators must be approved by the RFO or the Finance Manager.
- 10.10. Where payments are required by cheque, an Authorisation Sheet is attached to the source documentation such as an invoice or similar, along with a handwritten cheque from the current cheque book.
- 10.11. This is presented to the RFO or Finance Manager and two Councillors who are current signatories in accordance with the Council's bank mandate for signature. The cheque will be signed by the two councillors who will also initial the cheque stub.
- 10.12. In the interest of security, the cheque books are kept securely by the Finance Manager.
- 10.13. All payments made by the Council will be made available to the Internal Auditor for validation during internal audits.

## **11. Direct Debit Invoices and Payments**

- 11.1. Direct debits are used for certain regular or recurring payments where this is the most efficient method (e.g., utilities, rates, service

- agreements, leases and loan agreements, banking charges, subscriptions etc.). All direct debits must be supported by an underlying contract, agreement or tariff notification from the supplier.
- 11.2. Before any new direct debit is set up, the relevant budget-holding manager must confirm in writing (email is acceptable) that the arrangement is required, represents value for money, and can be contained within the approved budget. The direct debit mandate or online instruction must then be reviewed and authorised by the RFO or Finance Manager in accordance with the Council's bank mandate. The Finance team will record the new mandate on a Direct Debit Register, including the supplier's name, bank reference, expected frequency, typical amount or range, and the relevant cost centre and nominal code. No direct debit should be set up directly by teams without Finance team's involvement.
  - 11.3. For each direct debit arrangement, the supplier should, wherever possible, provide an invoice, bill or statement in advance of the payment date, either electronically or in hard copy. Invoices or notifications received directly by teams must be forwarded promptly to the Finance team. The Finance Officer will log and scan these and forward them to the relevant authorised officer or operational manager for review. The authorised officer should check the amount against the contract, tariff, usage data, where applicable, and previous bills, and confirm that the charge is reasonable and properly payable.
  - 11.4. Where a direct debit amount is in line with the agreed contract or reasonably consistent with previous bills, the authorised officer will confirm approval to the Finance team. Any significant variation or unexpected charge should be queried with the supplier and placed on hold, with the Finance team informed immediately so that, where possible, the direct debit can be suspended or reclaimed.
  - 11.5. The Finance Officer will ensure that all approved direct debit invoices are entered on the RBS Omega accounts system with the posting date reflecting the expected collection date where this is known.
  - 11.6. The Finance Officer will match all direct debit payments shown on the bank statement to the entries on RBS Omega and to the relevant invoices or statements. Any discrepancies, such as unexpected amounts, new references or unrecognised payees, will be investigated and reported to the Finance Manager and RFO. The Direct Debit Register will be updated for any changes in frequency, amount or status, including cancelled mandates.
  - 11.7. Any request to cancel or amend a direct debit must be initiated by the relevant budget-holding manager and confirmed in writing. The Finance team will then action the change on the bank's online system and record it in the Direct Debit Register. Where a service or contract

has ended, the operational manager must notify the Finance team promptly so that the direct debit can be cancelled and overpayments avoided.

- 11.8. A monthly list of direct debits with the relevant source documents attached will be presented to the RFO or Finance Manager and two councillors for verification.
- 11.9. A list of regular payments and direct debits shall be submitted to the Finance & General Purposes Committee every two years.

## **12. Use of Council Debit Cards**

- 12.1. On occasions, operational managers may need to purchase goods or services of an urgent nature, or for which a purchase order followed by an invoice will not be accepted, or for which there will be a significant saving with an online purchase.
- 12.2. In view of the above, Seaford Town Council may authorise the issue of debit cards for business use.
- 12.3. The issue of a Council debit card must be authorised by the Finance & General Purposes Committee and be issued to a named officer for their use only; no other individual may use the debit card.
- 12.4. The financial limit of each issued debit card shall not exceed £1,000. Upon being issued a debit card, the manager shall be advised of their individual limit.
- 12.5. Each officer issued with a debit card is solely responsible for its safe keeping and usage and for ensuring that the card is not used by others. PIN numbers will only be issued to the cardholder and must be kept confidential, as must the (CSC/CVN) number.
- 12.6. Lost or stolen cards must be reported to the issuing bank immediately upon discovery that the card is missing via the Finance Manager, or in their absence directly by the named cardholder themselves. The RFO must also be informed.
- 12.7. In the event of the named cardholder's termination of employment, the debit card must be returned to the Finance Manager for the card to be destroyed. The issuing bank will be advised to cancel the debit card to prevent any unauthorised usage.
- 12.8. Cash withdrawals are only permitted when being made to top-up petty cash and shall not be used for any other purpose. Cash withdrawals cannot exceed the financial limit of the petty cash float itself and must be authorised by the Finance Manager or RFO. When making a cash withdrawal to top-up the Petty Cash accounts, the cash withdrawal must be reconciled with the monthly Petty Cash statement.

- 12.9. A debit card issued to an officer shall be used for business purposes only and in conjunction with the officer's job role. It shall not be used for any non-business transactions, nor for any personal purchases.
- 12.10. Every debit card transaction must be entered by the cardholder on to their Debit Card Monthly Transaction spreadsheet. Receipts for all purchases must be submitted with the spreadsheet to the Finance team on the first working day of each month. The spreadsheet and accompanying receipts are checked by the Finance Manager and are subsequently reviewed by the RFO and two councillors.
- 12.11. The transaction receipts shall be reconciled monthly with the bank statements. In the event of any discrepancy, the RFO, Town Clerk and Chair of the Finance & General Purposes Committee must be notified, and an investigation initiated.
- 12.12. The cardholder is responsible for obtaining and submitting receipts for all transactions. The cardholder may become liable for any payments that cannot be supported by a valid receipt.
- 12.13. If the cardholder misuses the debit card or fraudulently uses the card, this will result in disciplinary action being taken against them.
- 12.14. Where a debit card is used to top up petty cash this should be done at the Post Office, where the exact amount required can be withdrawn, not at ATM machine.

### **13. Accounting for Petty Cash**

- 13.1. Petty Cash Floats allow authorised officers to purchase small sundry or one-off items that may be required immediately to meet operational needs, without the need to raise a purchase order.
- 13.2. The following general rules apply to the use of Petty Cash Floats:
  - (a) There is a Petty Cash Float limit of £250
  - (b) Receipts must be retained for payments made from petty cash to substantiate the payment. VAT receipts should be requested for all purchases to which VAT applies.
  - (c) Any income (cash) received by the teams must not be paid into the Petty Cash Float, but must be separately banked.
  - (d) A Petty Cash Voucher should be completed and authorised by a manager in order to make a claim for reimbursement of payments made from Petty Cash Floats.
  - (e) Petty Cash Vouchers and accompanying receipts are passed to the Finance Manager for approval and entered onto the relevant Cash Book on the RBS Omega Accounts System.
  - (f) Payments to reimburse Petty Cash Floats will be made by the Finance Manager by making a debit card cash withdrawal via the Post Office only.



## Seaford Town Council

<b>Report No:</b>	<b>147/25 – deferred from 29 January 2026</b>
<b>Agenda Item No:</b>	<b>6</b>
<b>Committee:</b>	<b>Full Council - Extraordinary</b>
<b>Date:</b>	<b>18 March 2026</b>
<b>Title:</b>	<b>Adoption of a Sexual Harassment Policy</b>
<b>By:</b>	<b>Darryl Keech, Deputy Town Clerk &amp; Responsible Financial Officer (RFO)</b>
<b>Purpose of Report:</b>	<b>To present the recommendation from the Personnel Committee to adopt the new Sexual Harassment Policy.</b>

**N.B. This is the report that was presented to 29 January Full Council but adjourned due to time constraints – there have been no changes to this report i.e. it is exactly the same as presented to 29 January Extraordinary Full Council**

<b>Actions</b>
<b>Full Council is advised:</b>
1. To consider the Sexual Harassment Policy, noting the recommendation for adoption by the Committee. 2. To move to a vote on the motions below.

<b>Recommendations</b>
<b>Full Council is recommended:</b>
1. To note the contents of the report. 2. To adopt the Sexual Harassment Policy, as recommended by the Personnel Committee.

### **1. Introduction**

- 1.1 In October 2024 a new duty under the Equality Act 2010 required employers to take “reasonable steps” to prevent sexual harassment of their

employees and other relevant parties, (such as councillors, contractors, consultants, and third parties) whose staff carry out duties for the Council. The creation of the Sexual Harassment Policy is the first step towards satisfying this requirement.

- 1.2 Officers have drafted the proposed policy, which was considered and recommended for adoption by the Personnel Committee at its meeting on 6 January 2026.
- 1.3 This report is now presenting the proposed Sexual Harassment Policy for consideration and adoption by Full Council, as recommended by the Personnel Committee.

## 2. Information

- 2.1 The proposed Sexual Harassment Policy is included at **Appendix A**.
- 2.2 Report 135/25 to the Personnel Committee provided:
  - (a) An introduction to the new requirements under the Equality Act 2010 and steps employers are advised to take to meet these,
  - (b) An overview of the training being provided internally within the Town Council to complement the introduction of the policy, and
  - (c) An overview of the policy content and policy recommendations by officers
- 2.3 Should members wish to revisit the report presented to the Personnel Committee, this can be viewed on the [Town Council's website](#) (page 18 onwards).
- 2.4 The Committee recognised the need for this policy to be introduced following the new duty under the Equality Act taking effect from October 2024.
- 2.5 Full Council is asked to consider the proposed Sexual Harassment Policy as recommended by the Personnel Committee and adopt this.
- 2.6 Upon adoption of the policy, guidance will be issued to all officers, councillors, and relevant third parties, about the implications of the policy and reminding officers of the opportunity to discuss this with their line manager or HR & OD Manager should they need any further clarification or guidance.

## 3. Financial Appraisal

- 3.1 There are no direct financial implications as a result of this report.

#### **4. Contact Officer**

**4.1** The Contact Officer for this report is Darryl Keech, Deputy Town Clerk & RFO.



SEAFORD  
TOWN  
COUNCIL



## SEXUAL HARASSMENT POLICY

*This policy sets out the Town Council's commitment to providing a supportive, inclusive, and respectful working environment, where unacceptable behaviour is immediately identified, challenged, and addressed, and offers guidance on how to raise and handle a complaint about sexual harassment that occurs within, or is associated with the Council*

*"Working with our community to secure Seaford's best future"*

### Policy Status

<b>Version</b>	0.1	<b>Last Review Date</b>	TBC
<b>Adopted Date</b>	TBC	<b>Next Review Date</b>	One year after adoption
<b>Review Period</b>	TBC	<b>Approving Body</b>	Full Council

### Version History

<b>Date</b>	<b>Version</b>	<b>Approval</b>	<b>Status</b>
n/a – new policy			

### Related Policies and Other References

<b>Policy Reference Code</b>	<b>Policy Name</b>
HRP6	Dignity at Work Policy
HRP7	Disciplinary Policy

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## **1. Introduction**

- 1.1. Seaford Town Council recognises that all officers and other parties carrying out work or duties on behalf of the Council (see section 3 for who this policy applies to) have the right to work in an environment where the dignity of individuals is respected and is free from harassment. Thus, the Council is committed to providing a workplace without any forms of harassment and discrimination, including sexual harassment.
- 1.2. The Council expects all of its officers and other parties carrying out work or duties on behalf of the Council to maintain high standards, ensuring safety across all areas of the Council, and to act at all times in accordance with the Council's Sexual Harassment Policy.
- 1.3. The Council is committed to preventing sexual harassment and any victimisation associated with it, to ensure that all officers feel a sense of belonging and protection.
- 1.4. Apart from this understanding, all officers and other parties carrying out work or duties on behalf of the Council are entitled to:
  - Be treated with dignity, respect and courtesy
  - Experience no form of unlawful discrimination
  - Be valued and regarded for their skills and abilities

## **2. Aim and Scope**

- 2.1. The purpose of this policy is to maintain a supportive, inclusive, and respectful working environment within the Council, where unacceptable behaviour is immediately identified, challenged, and addressed.
- 2.2. The policy includes guidance on how to raise a complaint about harassment that has occurred and is associated with the Council.
- 2.3. It is intended that the Policy will enhance staff safety, boost morale, and reduce stress to support officers' commitment to the Council and its standard operating procedures.
- 2.4. The Policy applies to sexual harassment on any grounds related to age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, sexual orientation.
- 2.5. This policy also ensures that any allegation of harassment at work is taken seriously and investigated.

### **3. Who This Applies To**

- 3.1. This Policy shall apply to all officers of the Council, irrespective of their employment status i.e., whether they are engaged on a full-time, part-time, temporary or permanent basis.
- 3.2. The provisions of this Policy shall also extend to all individuals associated with the Council, including, but not limited to, elected members and contractors acting on behalf of the Council. These groups are hereafter referred to within this policy as 'other parties carrying out work or duties on behalf of the Council'.
- 3.3. This policy shall also apply to any third parties engaged in work on behalf of the Council, including, but not limited to, agency personnel, consultants, and providers of services or supplies whose staff carry out duties for, or in association with, the Council. Also, referred to within this policy as 'other parties carrying out work or duties on behalf of the Council'.

### **4. Legal Framework**

- 4.1. On 26 October 2024, the Worker Protection Act 2023 (Amendment to the Equality Act 2010) came into effect, making a significant change to the law regarding an employer's obligations to protect its employees from sexual harassment. The Equality Act 2010 now places a legal duty on employers to take reasonable steps to prevent sexual harassment in the workplace.
- 4.2. In accordance with the Act, the Council commits to taking necessary actions to prevent sexual harassment in the workplace. These steps include:
  - Developing a culture of respect and inclusion through practices such as the Council's Staff Skills Training program for Bullying and Harassment.
  - Providing a clear understanding and communication between the Council and officers through the Council's Sexual Harassment Policy
  - Taking proactive steps to identify and mitigate risks of sexual harassment under the guidance of the HR & OD Manager.
  - Ensuring that other parties carrying out work or duties on behalf of the Council are aware, and have a clear understanding, of the Council's Sexual Harassment Policy and how this applies to them.

## **5. Defining Sexual Harassment**

- 5.1. Sexual harassment is any unwanted physical, verbal, or non-verbal conduct of a sexual nature that has the purpose or effect of violating a person's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment for them.
- 5.2. Sexual harassment can happen to men, women, and people of any gender identity or sexual orientation. Anyone who sexually harasses someone at work is responsible for their own actions, regardless of their sex or gender.
- 5.3. A single incident can be considered sexual harassment without systematic repetition. It also includes treating someone unfairly because they have previously accepted or rejected unwanted sexual conduct.
- 5.4. Types of behaviours which constitute sexual harassment include, but are not limited to:
  - 5.4.1. Physical conduct:
    - Unwelcome physical contact including patting, pinching, stroking, kissing and hugging
    - The use of job-related threats or rewards to solicit sexual favours
    - Physical violence, including sexual assault and rape
    - Fondling and inappropriate touching
  - 5.4.2. Verbal conduct:
    - Coercion
    - Sexual banter
    - Sexual advances, flirting
    - Making sexual jokes or comments
    - Sexual comments about someone's sexual orientation or gender identity
    - Spreading sexual rumours about a person or their sexual conduct outside of work
    - Addressing colleagues by using inappropriate nicknames
    - Unwelcome comments on someone's appearance, body shape, age or private life
    - Gossiping and speculating about someone's sexual orientation, including spreading malicious rumours.
    - Intrusive questioning or suggestions about someone's personal life
    - Repeated and unwanted social invitations for dates, meetings or physical intimacy
  - 5.4.3. Non-verbal conduct:
    - Sexually suggestive gestures that act as a sexual intent

- Sending, sharing, or displaying sexually explicit materials such as improper messages, images, and videos by any medium, or posters and calendars that expose nudity
  - Sending inappropriate emojis while emailing or messaging
  - Inappropriate facial expressions such as whistling, winking, licking lips, or raising eyebrows in a suggestive manner
- 5.5. The complainant(s) refers to any officer(s) or other parties carrying out work or duties on behalf of the Council who raise a concern about sexual harassment. Equally, a respondent refers to any officer(s) or other parties carrying out work or duties on behalf of the Council who are the subject of the complaint.
- 5.6. Sexual harassment is usually directed at an individual, but it might not always be the case. Sexual harassment in the workplace can sometimes occur as generalised behaviour that is not directed at a specific individual but may be witnessed or overheard. In such cases, any officer or other parties carrying out work or duties on behalf of the Council who observes or is affected by this behaviour is entitled to raise a concern or make a formal complaint.
- 5.7. Intent is not required for behaviour to be considered sexual harassment. Any unwelcome conduct may still be deemed harassment regardless of the respondent's intention. For instance, an officer may experience harassment, even if they were not the intended target e.g., when pornographic images are displayed on a colleague's computer in the workplace.
- 5.8. Sexual harassment can take place at any time and any location, including the workplace or at any workplace events (e.g., while travelling with colleagues to an event or online work events). Incidents occurring within these environments remain subject to the provisions of this policy.

## **6. Statement of the Council**

- 6.1. Seaford Town Council is committed to providing a safe and trustworthy environment for all officers and other parties carrying out work or duties on behalf of the Council by adhering to the Policy, while fostering a culture of mutual respect.
- 6.2. In order to foster a culture of respect and dignity in the workplace, the Council shall:
- Maintain a zero-tolerance approach for sexual harassment of any kind.
  - Ensure that all complaints are considered promptly and that appropriate proactive action shall be taken where necessary.

- Confirm that this Policy applies to all officers of the Council and other parties carrying out work or duties on behalf of the Council, irrespective of their role or status.
  - Investigate cases fairly, sensitively and confidentially.
  - Ensures that all officers and other parties carrying out work or duties on behalf of the Council are informed of, and will follow, the procedures for raising concerns and the complaint process as set out in this Policy
- 6.3. All officers and other parties carrying out work or duties on behalf of the Council are responsible for ensuring that they behave in an appropriate manner, showing respect for colleagues and individuals engaged with the Council's standard operations. Therefore, where possible, the Council expects its officers and other parties carrying out work or duties on behalf of the Council to challenge inappropriate behaviour that they witness or that is directed towards them.
- 6.4. The Council emphasises that complainant(s) are not required to negotiate with respondent(s) to resolve the issue informally and personally. Instead, respondent(s) are solely obligated to report the matter (see section 8 below).
- 6.4.1. The Council confirms that the complainant(s) will not be discriminated against or victimised for raising a complaint. Furthermore, any information relating to a raised concern shall remain confidential and will only be disclosed where necessary to address a safeguarding risk.

## **7. Roles & Responsibilities**

- 7.1. The Council acknowledges that achieving the purpose of this Policy (see Section 2) requires collaborative effort between managers and officers. Accordingly, the roles and responsibilities are defined to reflect the Council's commitment to this Policy and the principles outlined herein:
- **Line managers** are responsible for ensuring that they:
    - Monitor the workplace to ensure that zero-tolerance boundaries regarding any sexual harassment are in effect.
    - Be proactive in implementing any reasonable adjustments as necessary.
    - Support the creation of a culture where officers feel confident to work, raise concerns, and feel listened to.
    - Be a role model for promoting appropriate and professional behaviours in the workplace.

- Support the implementation of the Policy in a fair, consistent and transparent manner.
- **The HR & OD Manager** is responsible for ensuring that they:
  - Ensure that appropriate immediate actions are identified and implemented upon receipt of a complaint
  - Provide guidance and advice throughout the complaint and investigation process
  - Ensure that a person is not targeted or mistreated for making, or being involved in, a complaint of sexual harassment.
- **Officers and other parties carrying out work or duties on behalf of the Council** will:
  - Take accountability for raising any concern about sexual harassment in the workplace.
  - Co-operate with the Council and the overall harassment investigation process, whether a complaint has been filed against them or they have submitted a complaint.

## **8. Reporting Process**

- 8.1. The Council recognises that complainants may feel uncertain about how to proceed when faced with a distressing issue. In this case, an informal discussion with their line manager or HR & OD Manager may help them to understand the situation clearly.
- 8.2. Any complaint may be formally reported by either:
  - Officers or other parties carrying out work or duties on behalf of the Council who have been sexually harassed, in the workplace or relating to their work or duties for the Council.
  - Officers or other parties carrying out work or duties on behalf of the Council who have witnessed sexual harassment, in the workplace or in relation to their work or duties for the Council.
- 8.3. Any concern regarding sexual harassment needs to be reported immediately.
- 8.4. For officers, ideally the report should be submitted to the Council's HR & OD Manager, who is responsible for and trained in managing the process properly and accurately. Alternatively, complainant(s) can raise the issue with their line managers.
- 8.5. If the complaint relates to the conduct of the complainant's manager, the complainant may choose to discuss the matter with the HR & OD Manager or senior management.

- 8.6. Reporting can be made verbally or in writing. The complainant(s) should keep a record of any incidents, detailing when, where, what occurred and who witnessed.
- 8.7. The Council encourages its officers and other parties carrying out work or duties on behalf of the Council to raise their concerns in a transparent manner. If a person does not feel comfortable or safe raising a complaint, they can do so anonymously. However, reporting sexual harassment anonymously may cause a delay in conducting a thorough investigation and gaining a clear understanding of the situation.
- 8.8. Any concern raised shall be managed in accordance with the Council's Sexual Harassment Policy and, where appropriate, the Council's Disciplinary Policy.
- 8.9. Upon receiving a concern of sexual harassment, the Council will promptly and impartially investigate the allegations. The related investigation will be conducted by the HR & OD Manager with the support of the Town Clerk or a member of the strategic management team. Where not appropriate, the HR & OD Manager can be substituted by the Deputy Town Clerk or other suitably experienced individual e.g. an external HR professional.
- 8.10. Both the complainant(s) and respondent(s) shall be offered appropriate support under the guidance of the HR & OD Manager. Following meetings with the complainant(s) and respondent(s), additional interviews or investigations may be conducted if further information is required to assess the allegations.
- 8.11. Following the investigation, the Council will provide a report outlining its decision on the outcome of the complaint(s).
- 8.12. The Council prioritises confidentiality throughout the investigation process. Thus, any information received during the investigation meetings will be kept securely to ensure the safeguarding of individuals. However, the Council reserves the right to seek advice from, or share information with, appropriate external authorities (e.g., police) if it believes it is under an obligation to do so.
- 8.13. While the Council encourages the reporting of genuine concerns, making a false accusation of sexual harassment may be investigated as a potential disciplinary offence in line with the Council's disciplinary policy.
  - 8.13.1. In the case of other parties carrying out work or duties on behalf of the Council, this may result in the termination of a works contract held with the Council.
  - 8.13.2. In the case of councillors, this may result in a complaint being submitted to the Monitoring Officer.

## **9. Outcomes**

- 9.1. The Council may reach one of the following conclusions to complete the investigation process:
- There is insufficient evidence to support the complaint; accordingly, no action will be taken, and the complaint is not upheld.
  - A sexual harassment incident has occurred thus, appropriate action will be taken in accordance with the Council's formal disciplinary process depending on the severity of the offence.
  - The complaint is upheld. The outcome and recommendations are communicated, including referral for disciplinary action depending on the severity of the offence and additional support to complainant(s).
- 9.2. A complainant(s) who is not satisfied that their complaint against an officer has been taken seriously must raise a formal Grievance outlining their concerns and this will be investigated following the formal processes in the Council's Grievance Policy.
- 9.2.1 In the case of other parties carrying out work or duties on behalf of the Council, this may result in the termination of a works contract held with the Council.
- 9.2.2 In the case of councillors, this may result in a complaint being submitted to the Monitoring Officer.

## **10. Dealing with Third-Party Sexual Harassment**

- 10.1. The Council acknowledges that it carries the responsibility to protect its officers other parties carrying out work or duties on behalf of the Council from any third-party harassment.
- 10.2. Third-party sexual harassment can result in legal liability and will not be tolerated by the Council. Therefore, all officers and other parties carrying out work or duties on behalf of the Council are encouraged to report any third-party (e.g., contractors, consultants, service suppliers, customers or clients) harassment they are victim of, or witness, in accordance with this policy.
- 10.3. If any third-party harassment of officers or other parties carrying out work or duties on behalf of the Council occurs, the Council will take necessary steps to receive any complaints and to prevent it. The steps including, but not limited to, warnings to respondent(s) about their behaviour, banning them from the Council premises, reporting any criminal acts to the police, and sharing further information with other teams, units and services of the Council.

- 10.4. Any sexual harassment concern from a third party towards an officer or other parties carrying out work or duties on behalf of the Council must be reported immediately as per section 8 of this policy. The HR & OD Manager should assist the respondent officer or other parties carrying out work or duties on behalf of the Council as a part of the support mechanism within the Council.
- 10.5. The Council prioritises preventing third-party sexual harassment to maintain a safe workplace. To ensure this, the Council has:
  - A clear Sexual Harassment Policy that outlines third-party sexual harassment in addition to verbal, non-verbal and physical harassment
  - A training mechanism for recognising and responding to third-party harassment and outlining the responsibilities of line managers and the HR & OD Manager to assist officers in case of any concern.
  - Confidential reporting channels
  - A working culture where officers and other parties carrying out work or duties on behalf of the Council feel supported in reporting any misconduct

## **11. Handling Time-Off**

- 11.1. The Council adheres to its policies and legal requirements regarding any time off connected to sexual harassment issues or concerns.
- 11.2. If an officer requests time off after experiencing harassment, the Council will respond promptly and with empathy towards the request.
- 11.3. If needed, the Council will consider legal requirements regarding paid leave (e.g., sick leave for experiencing emotional distress or mental health issues or paid leave to allow the investigation to proceed while protecting the complainant(s) from harassment-related situations.
- 11.4. The Council ensures that taking leave for reasons related to harassment will not negatively affect the position or standing of the complainant within the Council.
- 11.5. The Council also commits to helping the complainant(s) feel secure and safe upon their return, including possible changes to working schedules or working environment arrangements.

## **12. Assessing and Managing Risks of Sexual Harassment**

- 12.1. The Council acknowledges that sexual harassment is a risk that can occur in the workplace.

- 12.2. Therefore, the Council undertakes a Sexual Harassment Risk Assessment to assess and eliminate the possible risks.
- 12.3. In addition to this assessment, the Council employs the following measures to prevent and address sexual harassment:
  - Having a process for reviewing policies and training
  - Having managerial level oversight (e.g., Town Clerk or Deputy Town Clerk) to make sure the Council is taking necessary actions to eliminate sexual harassment
  - Implementing preventive controls such as proper supervision and a clear code of conduct.

### **13. Further Support**

- 13.1. The Council is open to providing additional information and guidance to its officers on how to address concerns and complaints of sexual harassment in the workplace, upon request.
- 13.2. The Council understands that concerns regarding sexual harassment may cause stress, anxiety, and mental health problems. The Council will consider reasonable adjustments to encourage its officers to seek help and be supported.
- 13.3. Under these circumstances, the Council also attaches importance to its officers having access to free counselling and advice. All council officers can contact Care First on 01179342121 who provide a 24-hour counselling helpline for additional mental health support.
- 13.4. For further support and contact, the following channels are also suggested by the Council:
  - Sussex NHS Partnership for accessing resources and signposts for local mental health support by [www.sussexpartnership.nhs.uk/your-mental-health/getting-help](http://www.sussexpartnership.nhs.uk/your-mental-health/getting-help) website.
  - The Samaritans to access free listening services by calling 116 123 or by messaging [jo@samaritans.org](mailto:jo@samaritans.org) email address.



Seaford Town Council

<b>Report No:</b>	148/25 – deferred from 29 January 2026
<b>Agenda Item No:</b>	7
<b>Committee:</b>	Full Council - Extraordinary
<b>Date:</b>	18 March 2026
<b>Title:</b>	Adoption of an Absence Management Policy
<b>By:</b>	Darryl Keech, Deputy Town Clerk & Responsible Financial Officer (RFO)
<b>Purpose of Report:</b>	To present the recommendation from the Personnel Committee to adopt the new Absence Management Policy

**N.B. This is the report that was presented to 29 January Full Council but adjourned due to time constraints – there have been no changes to this report i.e. it is exactly the same as presented to 29 January Extraordinary Full Council**

<b>Actions</b>
<b>Full Council is advised:</b>
1. To consider the Absence Management Policy, noting the recommendation for adoption by the Committee. 2. To move to a vote on the motions below.

<b>Recommendations</b>
<b>Full Council is recommended:</b>
1. To note the contents of the report. 2. To adopt the Absence Management Policy, as recommended by the Personnel Committee.

## 1. Introduction

- 1.1 The creation of an Absence Management Policy ensures that officers are given clear guidance on the parameters of reporting and management of absence whilst adhering to employment legislation and guidance.
- 1.2 The policy deals with all absences and reporting, aside from sickness absence, which is covered by the Sickness Absence Policy.
- 1.3 Officers have drafted a proposed policy, which was considered by the Personnel Committee at its meeting on 6 January 2026.
- 1.4 This report is now presenting the proposed Absence Management Policy for consideration and adoption by Full Council, as recommended by the Personnel Committee.

## 2. Information

- 2.1 The proposed Absence Management Policy is included at **Appendix A**.
- 2.2 Report 131/25 to the Personal Committee provided:
  - (a) An introduction to the policy document that is the Absence Management Policy,
  - (b) Details of the review process, and
  - (c) An overview of the policy content and policy recommendations by officers
- 2.3 Should members wish to revisit the report presented to the Personnel Committee, this can be viewed on the [Town Council's website](#) (page 5 onwards).
- 2.4 The Committee identified that neither this policy nor the Sickness Absence Policy indicates how the Town Council handles long term absences. Officers have therefore committed to carrying out further work during 2026 to combine these two policies into one document that will also cover long term absences. In the meantime, it was agreed that the policy as proposed should be adopted. The Committee asked for this policy to be amended so as to have a review date of "when the Sickness Absence Policy is reviewed". As such this change has been made to the proposed policy at Appendix A.
- 2.5 Full Council is asked to consider the proposed Absence Management Policy as recommended by the Personnel Committee and adopt this.

**2.6** Upon adoption of the policy, guidance will be issued to all officers about the requirements within and implications of the policy and reminding them of the opportunity to discuss this with their line manager or HR & OD Manager should they need any further clarification or guidance.

### **3. Financial Appraisal**

**3.1** There are no direct financial implications as a result of this report.

### **4. Contact Officer**

**4.1** The Contact Officer for this report is Darryl Keech, Deputy Town Clerk & RFO.



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## ABSENCE MANAGEMENT POLICY

*This policy outlines the Council's approach to managing absences (not sickness absence) and, in doing so, prioritising the wellbeing of its staff*

*"Working with our community to secure Seaford's best future"*

## Policy Status

<b>Version</b>	0.1	<b>Last Review Date</b>	N/A
<b>Adopted Date</b>	TBC	<b>Next Review Date</b>	When the Sickness Absence Policy is reviewed
<b>Review Period</b>	TBC	<b>Approving Body</b>	Full Council

## Version History

<b>Date</b>	<b>Version</b>	<b>Approval</b>	<b>Status</b>
n/a – new policy			

## Related Policies and Other References

<b>Policy Reference Code</b>	<b>Policy Name</b>
HRP7	Disciplinary Policy
C7	Health and Safety Policy
HRP21	Sickness Absence Policy
PE9	Family Friendly Policy <i>(yet to be created – due to supersede the Maternity, Paternity &amp; Adoption Leave Policy)</i>

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11.0	Monitoring and Absence Recording

## **1. Introduction**

- 1.1. Seaford Town Council prioritises the wellbeing of its staff and seeks to protect their health and wellbeing by creating a safe working environment. In return, the Council expects all officers to take reasonable steps to attend work on a regular basis.
- 1.2. The Council acknowledges that unforeseen circumstances or other reasons may result in absence.
- 1.3. The Council recognises that absence impacts not only the individual officer, but also their colleagues who must cover for them.
- 1.4. Thus, the Council attaches great importance to managing absences while maintaining accountability for fair allocation of staffing.
- 1.5. This Absence Management Policy outlines the Council's approach to managing absences arising from specific reasons (not sickness absence).
- 1.6. The Council employs appropriate measures and actions to address prolonged periods of absence as necessary.

## **2. Aim and Scope**

- 2.1. This policy aims to promote best practice in absence management, ensuring all Council officers adhere to the appropriate procedures during their absence, and supporting a safe and effective return to work for all.
- 2.2. Thus, this policy is designed to provide guidance to the Council's officers and managers to ensure the efficiency and effectiveness of the Council's standard operations and business practices.
- 2.3. By managing absence, the Council seeks to minimise the amount of staff work time lost through health or other conditions, whilst also providing support to those absent for legitimate reasons.
- 2.4. To comply with its aim, the Council will:
  - Provide a supportive working environment for officers who are absent
  - Ensure that all managers and officers adhere to this policy and procedures
  - Acknowledge that absence levels are routinely monitored in line with this policy
  - Investigate unreasonable, persistent and unjustified absences or patterns of absence and take necessary actions to prevent their continuity.

## **3. Who This Applies To**

- 3.1. This policy shall apply to all officers of the Council, irrespective of their employment status, i.e., whether they are engaged on a full-time, part-time, temporary or permanent basis.
- 3.2. It does not apply to councillors or third parties, such as contractors or service providers.
- 3.3. The only exception to 3.2 is with those councillors that take on the role of line manager representatives for the Town Clerk – those councillors will undertake the duties within this policy that are assigned to line managers. Should those councillors require any support with interpretation or delivery of this policy, they should in the first instance speak with the Deputy Town Clerk.

#### **4. Legal Framework**

- 4.1. The Council is committed to promoting equality and combating unfair treatment.
- 4.2. Therefore, the Council will endeavour to ensure equal access to its policies and procedures and will eliminate discrimination or less favourable treatment on the grounds of any irrelevant consideration by embracing the principles of the Equality Act 2010.

#### **5. Roles and Responsibilities**

- 5.1. It is the responsibility of all officers to attend work regularly and to report any absences in line with the Council's established procedures.
- 5.2. Line managers are responsible for recording daily absences within their teams, while the HR & OD Manager holds responsibility for monitoring and overseeing the implementation of this policy.
- 5.3. Officers should seek guidance from their line manager whenever they need further explanation or clarification on any aspect of this policy.
- 5.4. The Council acknowledges that achieving the aims of this policy (see Section 2) requires collaborative effort between managers and their staff. Accordingly, roles and responsibilities are clearly defined below to reflect the Council's commitment to this policy.
  - **Line managers** will:
    - Ensure that officers are aware of the Council's Absence Management Policy and what is expected of them regarding regular attendance at work.

- Identify unacceptable levels of absence, including but not limited to sickness absence, paid sick leave, and holiday or parental leave in a prompt and sensitive manner.
- Ensure that all of their staff understand the procedures to be followed if they are unable to attend work.
- Ensure that all health, safety, and wellbeing matters are addressed wherever possible, providing support as needed, including maintaining regular contact with officers during extended periods of absence.
- Be responsible for recording daily absences of their direct reports, ensuring an up-to-date record is kept.
- Be responsible for conducting return-to-work meetings with their direct reports at the earliest opportunity, ideally on the officer's first day back.
  
- **HR & OD Manager will:**
  - Monitor officer absences and report them through the appropriate channels, in accordance with the Equality Act 2010.
  - Support line managers to investigate claims where individuals believe that they are being treated unfairly or unreasonably under this policy.
  - Manage the absence process in an efficient and timely manner ensuring that all return-to-work processes are conducted by line managers.
  - Support line managers in investigating absence-related claims.
  - Advise both line managers and staff members in the application of this policy.
  
- **Officers will:**
  - Take full responsibility for their own wellbeing to maintain good attendance at work and seek timely advice from relevant professional bodies, when required.
  - Comply with the requirement to report sickness absence by informing their line manager when they are unable to attend work.
  - Attend return-to-work meetings regarding their absence.
  - Seek clarification from their line manager if they are unsure of the absence reporting procedures.
  - Consider what help and support they may need to facilitate a return to work.
  - Be aware of the standard of attendance expected of them such as sickness leave and the consequences if they reach or exceed the maximum limit of absence.
  - Return to work as soon as they are able.

## **6. Absence Reporting Procedure**

### **6.1. Unplanned Absences**

6.1.1. Officers must inform their line managers as soon as possible if they are unable to attend work for any reason. In the absence of their line manager, the officer must inform the HD & OD Manager or another manager available at the time. If the officer is unable to contact either, they should leave a message for the Town Clerk or Deputy Town Clerk by calling or sending an email.

6.1.2. When reporting absence, officers should provide the following information:

- The reason for absence
- The start date of the absence
- The expected return-to-work date
- Whether there are any immediate work commitments that need completing or reassigning during their absence

6.1.3. Absences should be reported by a phone call or email on the first day of the absence. During the initial contact, officers must provide the details above. In this case, it is not acceptable for officers to leave messages on voicemail only i.e. if the phone call is not answered, an email must be sent.

6.1.4. Absence notifications should be made by the officers themselves, except in exceptional circumstances such as hospitalisation or incapacitation due to injury or accident (see Sickness Absence Policy).

6.1.5. If an officer is unable to report their own absence, they must ensure that another person notifies the Council on their behalf.

6.1.6. Officers are expected to maintain contact with their line manager until their return e.g. with any significant changes to their expected return to work date.

### **6.2. Unplanned Absences**

#### **6.2.1. Time Off for Dependants**

6.2.1.1. The Council acknowledges that all officers have a right to time off to address unforeseen circumstances and emergencies affecting a dependant (e.g., a child's severe illness, a parent's medical emergency, a dependant's accident or injury).

6.2.1.2. The Council will grant a reasonable amount of time to allow for alternative arrangements in the event of unexpected issues or emergencies. This leave is normally granted for one (1) or two (2) days and will be treated on a case-by-case basis, depending on the severity of the situation. All such leave will be unpaid.

6.2.1.3. Officers are required to notify their line manager at the earliest convenience by providing the reason for the leave, the steps they will take to address the issue, and the anticipated duration of the absence.

### **6.2.2. Carer's Leave**

6.2.2.1. All officers who provide care for a dependant with a long-term care requirement are entitled to a period of unpaid Carer's Leave.

6.2.2.2. This Policy acknowledges a dependant as any individual who reasonably relies on the officer for care, including a spouse, civil partner, child, parent, or any person residing in the same household as the officer, excluding tenants, lodgers, and boarders.

6.2.2.3. The leave may be taken in full-day or half-day periods, with a maximum duration of one week within any twelve (12) month period.

6.2.2.4. The request for leave should be submitted to the officer's line manager as far in advance as possible. Ideally, the notice period should be at least twice the requested leave duration. The line manager will review the request and confirm approval in writing, taking into account operational requirements.

### **6.2.3. Holiday Leave**

6.2.3.1. The Council acknowledges that officers are entitled to annual leave, which may be taken as holiday leave in accordance with their entitlement.

6.2.3.2. Officers will receive the same pay during their holiday leaves as they do on their regular working days.

6.2.3.3. It is the responsibility of officers to manage their annual leave and to notify their line manager promptly and properly. Ideally, the notice period should be at least twice the requested leave duration.

6.2.3.4. Officers are required to request their exact days off to their line managers via email or phone.

6.2.3.5. The Council encourages officers to submit their holiday leave requests as soon as possible to allow line managers sufficient time to make any necessary adjustments to the team.

6.2.3.6. The Council reserves the right to decline all or part of a holiday leave request where there are clear business reasons for doing so. Line managers will not unreasonably reject requests for holiday leave.

#### **6.2.4. Bereavement Leave**

6.2.4.1. Most people will experience the death of a person close to them during their working lives. Grief is a natural response people have when they experience a death (a bereavement). It can affect someone in several ways and can impact on their ability to undertake their work.

6.2.4.2. The Council acknowledges the sensitive nature of bereavement and grief. Thus, the Council prioritises supporting its officers in practical and reasonable ways.

6.2.4.6. In the event of the loss of a close relative or family member, an officer may be granted up to five (5) working days of paid bereavement leave, if required. Close relatives or family members include the following:

- Spouse or civil partner
- Parent or parent-in-law
- Sibling, including half-, step-, adoptive and foster siblings
- Grandparent or grandchildren

6.2.4.3. Bereavement leave allows an officer time off to deal with their personal grief and related practical arrangements, primarily but not limited to the funeral of a family member.

6.2.4.4. However, the Council understands that some officers will need additional time away from work, depending on their relationship with the individual(s) who has passed.

6.2.4.5. In these circumstances, additional time off may be taken as annual leave or unpaid leave.

6.2.4.7. An officer who suffers a stillbirth or the loss of a child will be entitled to two (2) weeks paid parental bereavement leave. Officers are entitled to take this leave over a two-week period or may choose to take it over two separate occasions, in one-week blocks.

6.2.4.8. In the event that a distant relative or a non-family member passes away, officers may be granted one (1) day of paid leave to attend the funeral. If additional time is required, for example, due to funeral arrangements or travel abroad to attend the funeral, the officer should request annual leave or unpaid leave.

6.2.4.9. In the event of multiple deaths of dependants, such as in a single incident or accident, any request for leave should be handled with the utmost sensitivity. In this situation, the officer will be entitled to bereavement leave for each individual loss.

6.2.4.10. In these unfortunate circumstances, officer should inform their line manager and/or the HR & OD Manager of their need to take leave as soon as possible, and at the latest, on the first day of the absence. Otherwise, the officer's next of kin or family member can notify the Council on the officer's behalf.

6.2.4.11. Officers may use their annual leave in the usual manner if they have used all their bereavement leave or are not eligible for any other leave under this policy.

## **7. Failure to Comply with Any Absence Reporting Procedures**

- 7.1. If any officer fails to follow the Council's procedures for reporting or confirming their absence, and/or misuses the Absence Management Policy in any way (including false declaration), they may be subject to a thorough investigation, which may lead to formal processes being undertaken, with possible disciplinary action being taken against them.
- 7.2. In this case, the absence will be treated as unauthorised and will not be paid.

## **8. Regular Communication throughout the Absence**

- 8.1. The Council expects that officers will remain in regular contact with their line manager and/or HR & OD Manager throughout any unplanned or planned absence, when possible.
- 8.2. The means and frequency of this contact should be agreed with the line manager when the officer notifies them of their initial absence, taking into account the seriousness of the reason for the absence.
- 8.3. This approach enables the Council to manage officers' workloads during their absence while providing appropriate support and adjustments as needed.
- 8.4. In exchange, the line manager will ensure that the officer is kept suitably up to date with any significant updates from the Town Council e.g. the departure or welcome of any members of staff, significant changes in policy that directly affect staff or any situations that officers are to be consulted on. The HR & OD Manager can offer guidance to the line

manager as to what is considered a suitable update for officers who are absent.

## **9. Return-to-Work Meetings**

- 9.1. Effective absence management depends on the availability of relevant information; thus, the Council acknowledges a return-to-work meeting following each period of absence.
- 9.2. Therefore, when the officer returns to work after any period of absence, the line manager will be responsible for arranging a return-to-work meeting with their staff member.
- 9.3. Return-to-work meetings provide an informal opportunity to establish the cause of the absence, indicate to the officer that the Council is interested in their welfare, and determine whether the officer requires any further help or support. With these meetings, the Council also aims to:
  - Provide line managers with an opportunity to assess whether officers are fit to return to work.
  - Alert the Council to any concerns regarding situations where an unsatisfactory absence recording is developing.
  - Ensure that the officer is updated about work-related matters, duties and tasks that have occurred during their absence.
  - Provide appropriate support and encouragement for officer's reintegration into their working routine upon their return.
- 9.4. This meeting will occur on the first day back or as soon as possible thereafter.
- 9.5. Line managers will arrange the return-to-work meeting at a reasonable time for the officer to attend, and this will be held in a private, face-to-face setting where possible.
- 9.6. For short-term absences, the meeting may be an informal verbal conversation. However, for medium- to long-term absences, an in-depth formal conversation/meeting will be initiated to ascertain if any support is needed for the officer to return to the workplace and their normal work pattern and/or duties, and maintain good attendance at work.
- 9.7. In exceptional circumstances, the meeting may be held by telephone if a face-to-face or online meeting is not possible.
- 9.8. The Council recognises that this meeting is intended to support the officer's return to work and to discuss any assistance they may require. It is not intended to imply any mistrust regarding the absence. However, if there is any reasonable doubt, the Council will objectively investigate the reason and circumstances of the absence.

## **10. Monitoring and Absence Recording**

- 10.1. The HR & OD Manager will ensure that all absence records are maintained for all officers. These records will provide the base data for the compilation, as required, of statistics showing the level of sickness absence across the Council.
- 10.2. The absence monitoring system will also enable the HR & OD Manager to identify individual cases where frequent absences occurred, or where patterns of absence have been identified.
- 10.3. Line managers should ensure that records of contact during and after absence are completed thoroughly and accurately and stored on the officer's personnel files or records.

These records should be treated as confidential at all times. Officers will be entitled to access these records on request

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## Seaford Town Council

<b>Report No:</b>	<b>149/25 – deferred from 29 January 2026</b>
<b>Agenda Item No:</b>	<b>8</b>
<b>Committee:</b>	<b>Full Council - Extraordinary</b>
<b>Date:</b>	<b>18 March 2026</b>
<b>Title:</b>	<b>Adoption of a Menopause Policy</b>
<b>By:</b>	<b>Darryl Keech, Deputy Town Clerk &amp; Responsible Financial Officer (RFO)</b>
<b>Purpose of Report:</b>	<b>To present the recommendation from the Personnel Committee to adopt the new Menopause Policy</b>

**N.B. This is the report that was presented to 29 January Full Council but adjourned due to time constraints – there have been no changes to this report i.e. it is exactly the same as presented to 29 January Extraordinary Full Council**

<b>Actions</b>
<b>Full Council is advised:</b>
1. To consider the Menopause Policy, noting the recommendation for adoption by the Committee.
2. To move to a vote on the motions below.

<b>Recommendations</b>
<b>Full Council is recommended:</b>
1. To note the contents of the report.
2. To adopt the Menopause Policy, as recommended by the Personnel Committee.

### **1. Introduction**

- 1.1** It is recommended that employers have a Menopause Policy in place. This ensures that line managers understand their responsibilities and support

those impacted by menopause, whilst ensuring adherence to the Equality Act 2010 and employer's health and safety duties.

- 1.2 Officers have drafted a proposed policy, which was considered by the Personnel Committee at its meeting on 6 January 2026.
- 1.3 This report is now presenting the proposed Menopause Policy for consideration and adoption by Full Council, as recommended by the Personnel Committee.

## 2. Information

- 2.1 The proposed Menopause Policy is included at **Appendix A**.
- 2.2 Report 133/25 to the Personal Committee provided:
  - (a) An introduction to the requirements of the Equality Act 2010 and how menopause symptoms may be treated as a disability,
  - (b) Recommended steps to ensure that the employer and its officers are supporting staff experiencing the menopause, and
  - (c) An overview of the policy content and policy recommendations by officers
- 2.3 Should members wish to revisit the report presented to the Personnel Committee, this can be viewed on the [Town Council's website](#) (page 33 onwards).
- 2.4 The Committee was content with the policy as presented and had no concerns or comments.
- 2.5 Full Council is asked to consider the proposed Menopause Policy as recommended by the Personnel Committee and adopt this.
- 2.6 Upon adoption of the policy, guidance will be issued to all officers about the implications of the policy and reminding them of the opportunity to discuss this with their line manager or HR & OD Manager should they need any further clarification or guidance.
- 2.7 At this stage, this policy only applies to officers. There are some isolated examples of councils introducing measures / policies to support councillors experiencing menopause. Should the Council wish to, this can be researched and included in the next review of the policy, which is due to take place one year after its adoption.

## 3. Financial Appraisal

- 3.1 There are no direct financial implications as a result of this report.

#### **4. Contact Officer**

**4.1** The Contact Officer for this report is Darryl Keech, Deputy Town Clerk & RFO.



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## MENOPAUSE POLICY

*This policy sets out the Town Council's commitment to supporting officers experiencing the menopause and the procedures in place to deliver this support*

*"Working with our community to secure Seaford's best future"*

## Policy Status

<b>Version</b>	0.1	<b>Last Review Date</b>	TBC
<b>Adopted Date</b>	TBC	<b>Next Review Date</b>	One year from adoption
<b>Review Period</b>	TBC	<b>Approving Body</b>	Full Council

## Version History

<b>Date</b>	<b>Version</b>	<b>Approval</b>	<b>Status</b>
n/a – new policy			

## Related Policies and Other References

<b>Policy Reference Code</b>	<b>Policy Name</b>
C7	Health and Safety Policy
HRP6	Dignity at Work Policy
HRP7	Disciplinary Policy
HRP11	Flexible Working Policy
HRP16	Performance Management Policy
HRP20	Sexual Harassment Policy
HRP21	Sickness Absence Policy

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## **1. Introduction**

- 1.1. Seaford Town Council is committed to safeguarding the health, safety, and wellbeing of its officers and ensuring all individuals are treated with dignity and respect.
- 1.2. The Council recognises that some officers may need additional support and consideration to improve their work experience, particularly during menopause.
- 1.3. By acknowledging this, the Council is committed to creating an open and supportive culture in which officers feel comfortable discussing, without embarrassment, how menopause-related symptoms may be affecting them at work.
- 1.4. Thus, the Council is dedicated to supporting officers experiencing menopause and ensures that managers are informed of the need to provide reasonable adjustments where necessary to minimise the impact of symptoms on officers' ability to perform and undertake their duties and workload.
- 1.5. This policy provides guidance for both officers and managers on how to support individuals who are experiencing perimenopause, menopause, or post-menopause.

## **2. Aim and Scope**

- 2.1. The purpose of this policy is to provide guidance on supporting Council officers who raise menopausal issues, not only for individuals experiencing menopause, but also for those indirectly affected, including managers and colleagues.
- 2.2. To achieve this, the policy also addresses:
  - Providing clarity and direction on how the Council will manage and support menopause-related issues.
  - Reducing potential absenteeism related to experiencing menopause and supporting officers to remain effective in their work.
  - Raising awareness and understanding of menopause among all colleagues, enabling officers to have open and supportive conversations and feel confident in using the policy.
  - Creating an environment where officers experiencing menopause feel confident to raise issues about their symptoms and request support and adjustments when needed.
  - Ensuring that managers are informed about the possible symptoms of menopause, their impact on officers, and the measures that can

be taken to support affected individuals, including implementing reasonable adjustments.

- 2.3. For the purpose of this policy, *menopause*, includes the perimenopause and post-menopausal stages.

### **3. Who This Applies To**

- 3.1. This Policy shall apply to all officers of the Council, irrespective of their employment status, i.e., whether they are engaged on a full-time, part-time, temporary or permanent basis.
- 3.2. This policy shall not apply to councillors or any third parties engaged in work on behalf of the Council, including, but not limited to, agency personnel, consultants, and providers of services or supplies whose staff carry out duties for or in association with the Council.

### **4. Legal Framework**

- 4.1. While no specific legislation directly addresses the impact of menopause in the workplace, employers are legally required under the Health and Safety at Work 1974 to ensure the health, safety and wellbeing of officers.
- 4.2. Furthermore, the Council acknowledges that it is legally obliged under the Equality Act 2010 to consider making reasonable adjustments to an officer's role or working conditions to prevent discrimination or disadvantage arising from their sex or gender.
- 4.3. By adopting and applying this policy, the Council aims to promote equal opportunities for all and eliminate discrimination related to age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation.

### **5. Defining Menopause**

- 5.1. Menopause is a biological stage in a woman's life that occurs when she stops menstruating and reaches the conclusion of her reproductive period.
- 5.2. Menopause includes three main stages:
  - **Pre-menopause** is the period before any menopausal symptoms occur,

- **Perimenopause** when menopausal symptoms occur due to hormone changes, but periods still happen, and,
  - **Post-menopause** is the period after 12 months with no periods but still experiencing the effects of the menopause symptoms.
- 5.3. Menopause is usually a natural, gradual process, though it can sometimes occur suddenly due to medical intervention, and symptoms typically appear between ages 45 and 55.
- 5.4. Menopause is best described as a transition, as symptoms typically last for several years rather than being a one-time experience.
- 5.5. Menopause may lead to a range of symptoms, which vary in nature, severity and duration for each individual. These symptoms may also interact with one another and include, but are not limited to:
- 5.5.1. Physical symptoms:
- Hot flushes (brief and sudden surges of heat usually felt in the face, neck and chest and often require fresh air to relieve)
  - Headaches
  - Dizziness, aches and fatigue
  - Joint stiffness, aches and pains
  - Heavy bleeding and irregular periods
  - Sleep disturbances that can make people feel tired and irritable, including night sweats (hot flushes that happen during the night)
  - Palpitations (heartbeats that become more noticeable)
  - Skin changes (dryness, acne, general itchiness) and hair loss
- 5.5.2. Psychological symptoms:
- Panic attacks
  - Mood disturbances, including anxiety and depression
  - Memory loss and brain fog
  - Loss of confidence and reduced concentration
- 5.6. Menopausal symptoms may worsen pre-existing conditions, potentially resulting in discomfort, distress, physical pain, and thus reduced effectiveness at work, and may create challenges for officers in performing their daily tasks.

## **6. Statement of the Council**

- 6.1. The Council is committed to equality, diversity and inclusion, embracing a culture in which every officer and member of the community is treated fairly, represented, and genuinely respected.
- 6.2. By adopting this policy, the Council supports a respectful and supportive environment for all officers and managers, where menopause-related distress and concerns can be managed through appropriate adjustments and mutual respect.

- 6.3. To foster this culture and environment, the Council attaches significant attention to avoiding:
- Lack of awareness about menopause
  - Unsympathetic management of menopause-related concerns
  - Increased emotional stress due to insufficient managerial support
  - Limited access to toilets and inflexible break times
  - Negative attitudes toward officers experiencing menopause
  - Poor access to drinking water
- 6.4. The Council has a zero-tolerance approach to any bullying or inappropriate behaviour in the workplace. Therefore, if an officer is mistreated by a colleague due to menopause-related matters, this behaviour will be investigated and where appropriate, treated under the Council's Disciplinary Policy.

## **7. Roles and Responsibilities**

- 7.1. The Council recognises that achieving the objectives of this policy (see Section 2) requires collaboration between managers and their staff members. The following roles and responsibilities demonstrate the Council's commitment to these principles:

- **Line managers** are responsible for ensuring that they:
  - Familiarise themselves with the Menopause Policy and understand the support that they can provide to officers.
  - Promote open conversations and encourage a culture where officers feel able to talk about their symptoms, appreciating the personal nature of the conversation, and treating the discussion sensitively and professionally.
  - Keep all information shared by the officer in the strictest confidence and do not share further without the officer's consent.
  - Consider support arrangements and implement accordingly for officers who are perimenopausal, post-menopausal, or who are currently going through the menopause and experiencing symptoms, ensuring all agreed reasonable adjustments are adhered to, recorded and reviewed regularly to evaluate their effectiveness.
- **HR & OD Manager** is responsible for ensuring that they:
  - Provide support, advice and guidance to managers about how to handle and address absence and performance issues related to the menopause.
  - Maintain up-to-date knowledge of what is available to support officers experiencing menopausal symptoms.
  - Record adjustments agreed, and actions to be implemented.

- Ensure that officers are made aware of the support mechanisms available within the council and are signposted to further resources externally.
- Encourage officers to seek help and support for menopausal-related concerns to manage their wellbeing in the workplace.
  
- **Officers will:**
  - Put effort into understanding their responsibilities under this policy.
  - Take personal responsibility to prioritise their own health and wellbeing, and to speak to their GP for advice and regular check-ups.
  - Report any concerns they may have to their line manager if they are struggling with any aspect of their role because of symptoms associated with the menopause.
  - Report any instances of harassment, bullying, victimisation or discrimination related to menopause, whether experienced personally or witnessed.

## **8. Requesting Support**

- 8.1. Officers who feel that menopause or associated symptoms are affecting their work or daily tasks are encouraged to discuss their concerns and/or needs with their line manager, allowing appropriate support to be provided and work performance maintained.
- 8.2. In cases where officers do not feel comfortable talking about it with their line manager initially, they are encouraged to liaise with the next senior manager (e.g., the line manager's manager) or the HR & OD Manager.
- 8.3. If, for any reason, an officer is unable to reach their line manager (e.g., due to annual leave or sickness absence), it is the officer's responsibility to raise the issue with the HR & OD Manager or the Deputy Town Clerk.
- 8.4. Requests may include temporary changes (e.g., adjustments to workspace arrangements) or seeking external supports such as guidance for accessing counselling services.

## **9. Council's Support**

- 9.1. When support is requested, the Council will ensure every effort is made to address it.
- 9.2. The Council will consider all requests for reasonable adjustments required to comply with the aims of this policy (see Section 2).
- 9.3. The Council will maintain confidentiality regarding any personal information shared and will securely store any related documents or written statements.

## 10. Reasonable Adjustments

- 10.1. Reasonable adjustments are intended to help officers experiencing menopausal symptoms, enabling them to perform their duties as comfortably as possible.
- 10.2. Reasonable adjustments, as referred by the Council, refer to measures designed to remove or reduce any disadvantage experienced by officers going through menopause. These adjustments should be practical to implement, affordable, and not harmful to the health and safety of the officer and other colleagues.
- 10.3. Adjustments will be implemented only if a clear need for additional support has been identified.
- 10.4. Adjustments will be applied in consideration of both the Council's operational requirements and the officer's needs.
- 10.5. The Council acknowledges that it is important to understand the barriers an officer may face. Therefore, line managers are expected to engage in discussions with officers to understand the barriers they face and determine the most suitable adjustments to reduce the impact of menopausal symptoms in the workplace.
- 10.6. Reasonable adjustments that may be requested or considered include, but are not limited to, the following:
  - **Flexible Working on a Temporary Basis** may include:
    - **Flexible hours or temporary shift** changes to accommodate difficulties.
    - **Additional short breaks** including being able to briefly access fresh air and return without having to explain.
    - **Allowing later start or earlier finish times** to provide additional time for treatments, hospital or GP appointments, if required, in accordance with the with the Council's Flexible Working Policy.
    - **Allowing early days-off** if officers feel unwell or experience severe bleeding.
    - **Updated start and finish times for the work-from-home option**, where daily tasks allow, to support officers in working more productively and managing the impact of their discomfort.
  - **Updates for Working Environment** may include:
    - **Facilitating an accessible working environment** by relocating a workstation closer to the toilet and drinking water units.
    - **Flexibility in work wear** to allow officers to use more comfortable clothing or fabrics while working.
    - **Providing additional temperature, ventilation and lighting controls** to allow officers to adjust heaters, fans or lighting as

needed and position themselves away from hot or cold spots in the office where they can get a breeze or have greater access to natural light.

- **Providing a quiet working environment** to support officer's focus and overall wellbeing.
  - **Providing extra storage** for sanitary products and medicine.
  - **Ergonomic adjustments** to ease joint pain and bodily discomfort.
- 10.7. Any absence or change to the working schedule must be agreed with the officer's line manager. Furthermore, any absence or change should be addressed in accordance with the Council's Absence Management Policy.
- 10.8. If an officer is experiencing sickness related to menopause symptoms and/or is unable to work, they must report their sickness immediately to their line manager or the HR & OD Manager, in the line manager's absence.

## **11. Failure to Comply with the Policy**

- 11.1. While the Council encourages officers to report genuine concerns and support needs related to menopause, any officer who fails to follow the Council's procedures for reporting or confirming menopause-related sickness absence, or who misuses this policy (including providing false information about symptoms or abusing workplace adjustments), may be subject to a thorough investigation process, and treated as a serious matter. Where appropriate, and depending on the severity of the breach, the matter may lead to formal action under the Council's disciplinary or relevant conduct procedures.
- 11.2. In this case, the absence will be treated as unauthorised and will not be paid.

## **12. Further Support**

- 12.1. Officers experiencing menopausal symptoms are encouraged to explore appropriate measures and options to help manage these symptoms effectively.
- 12.2. The Council therefore recommends external support channels to ensure that officers can access reliable information and guidance from accurate sources.
- 12.3. Officers can reach out to further support and contact through the following channels, which are as follows:
- **NHS Information** to access useful and detailed information and guidance for individuals experiencing menopause or early

menopause <https://www.nhs.uk/conditions/menopause/> or  
<https://www.nhs.uk/conditions/early-or-premature-menopause/>  
official website.

- **National Institute for Health and Care Excellence (NICE) Guidelines** to access guidelines on care and support offered to individuals by GPs at <http://www.nice.org.uk/guidance/ng23/ifp/chapter/> address
- **Menopause Matters** as the award-winning, independent website providing up-to-date, accurate information about the menopause, menopausal symptoms, and treatment options on the official <https://www.menopausematters.co.uk/> website.
- **Women's Health Concern** as one of the charity organisations, aims to support women with their healthcare by providing unbiased, accurate information on its website, <https://www.womens-health-concern.org/>
- **Daisy Network** who provides information and support to women diagnosed with Premature Ovarian Insufficiency, also known as Premature Menopause by <https://daisynetwork.org/> official website.
- **The Menopause Exchange** as an independent advice service about the menopause, midlife and post-menopausal health. They send out a free quarterly newsletter with useful impartial help and support and it's accessible via <https://www.menopause-exchange.co.uk/> website.
- **My Menopause Doctor** aims to empower women with the information they need to make informed decisions about any treatment they may take to turn menopause into a positive experience that does not negatively impact their lives. Further information is available on the official <https://yourmenopausedoctor.co.uk/> website.



Seaford Town Council

<b>Report No:</b>	<b>162/25 – deferred from 29 January 2026</b>
<b>Agenda Item No:</b>	<b>9</b>
<b>Committee:</b>	<b>Full Council - Extraordinary</b>
<b>Date:</b>	<b>18 March 2026</b>
<b>Title:</b>	<b>Review and Classification of the Staff Handbook</b>
<b>By:</b>	<b>Darryl Keech, Deputy Town Clerk &amp; Responsible Financial Officer</b>
<b>Purpose of Report:</b>	<b>To present the recommendation from the Personnel Committee to adopt the revised Staff Handbook and to henceforth disapply the Staff Handbook from being considered as a ‘policy’</b>

**N.B. This is the report that was presented to 29 January Full Council but adjourned due to time constraints – there have been no changes to this report i.e. it is exactly the same as presented to 29 January Extraordinary Full Council**

<b>Actions</b>
<b>Full Council is advised:</b>
<ol style="list-style-type: none"><li>1. To consider the revised Staff Handbook document recommended for adoption by the Personnel Committee.</li><li>2. To consider the recommendation from the Personnel Committee to disapply the Staff Handbook from being considered as a ‘policy’, meaning that the document can be updated as required, without the need to refer this each time to Personnel Committee and Full Council for adoption.</li><li>3. To move to a vote on the motions below.</li></ol>

## Recommendations

### Full Council is recommended:

1. To note the contents of the report.
2. To adopt the updated Staff Handbook, as recommended by the Personnel Committee.
3. To agree that, with immediate effect, the Staff Handbook is no longer to be treated or considered as a 'policy', as recommended by the Personnel Committee.
4. To delegate power to the Town Clerk and Deputy Town Clerk to update the Staff Handbook as required, as recommended by the Personnel Committee.

## 1. Introduction

- 1.1 The Town Council's Staff Handbook should be a key 'live' document used, not only when onboarding new staff, but also during an employee's lifecycle as one of the initial reference points when queries arise around the Town Council's employment policies or practices.
- 1.2 The Staff Handbook was identified as being out of date and no longer aligning with Town Council policies. Following the review and updating by officers, the Personnel Committee met and considered the revised Staff Handbook at its meeting on 6 January 2026.
- 1.3 This report is now presenting the proposed Staff Handbook for consideration and adoption by Full Council, as recommended by the Personnel Committee.
- 1.4 In addition, Full Council is also being asked to consider that the Staff Handbook no longer be treated as a policy document and delegate the necessary powers to officers to update this document as needed.

## 2. Information

- 2.1 The proposed Staff Handbook is presented at **Appendix A**. The current version of the handbook has not been included, as there are a number of changes in terms of content, layout and formatting, and it would be confusing to compare or follow these tracked changes.
- 2.2 Report 135/25 to the Personnel Committee provided:
  - (a) An introduction to the Staff Handbook,
  - (b) Details of the review process,

- (c) An overview of the changes being recommended by officers, and
- (d) The justification for the request to no longer consider this as a policy document

- 2.3 Should members wish to revisit the report presented to the Personnel Committee, this can be viewed on the [Town Council's website](#) (page 46 onwards).
- 2.4 To confirm some key points around the declassification as a policy: by disapplying the Staff Handbook as a policy this means it can be kept up to date at all times and link to the most up to date policies as they are updated and approved by Full Council. The alternative would mean officers needing to repeatedly revisit the Staff Handbook at Personnel Committee followed by Full Council each time an underlying policy changes. This is considered to be an ineffective and a disproportionate waste of officers' and councillors' time.
- 2.5 For the assurance of councillors, officers propose to reference any changes to the Staff Handbook in the HR Update report brought to each Personnel Committee, for the Committee to note.
- 2.6 The Committee considered report 135/25 and, following a discussion, supported the updated version of the Handbook and the proposals within the report regarding this no longer being a policy document.
- 2.7 Full Council is asked to consider the motions within this report, as recommended by the Personnel Committee.
- 2.8 Upon adoption, the revised handbook will be circulated to all staff with an overview of the key changes and the process for updating this Handbook going forwards.

### **3. Financial Appraisal**

- 3.1 There are no direct financial implications as a result of this report.

### **4. Contact Officer**

- 4.1 The Contact Officer for this report is Darryl Keech, Deputy Town Clerk & Responsible Financial Officer.



SEAFORD  
TOWN  
COUNCIL



Staff

# Handbook

*This Staff Handbook is a guide to Seaford Town Council's culture and sets out the expectations and practical procedures for all Town Council officers*

*"Working with our community to secure Seaford's best future"*

### Handbook Status

<b>Version</b>	0.2	<b>Last Review Date</b>	March 2019
<b>Adopted Date</b>	March 2019	<b>Next Review Date</b>	TBC
<b>Review Period</b>	TBC	<b>Approving Body</b>	Officers – with updates on changes reported to the Personnel Committee for noting

### Version History

<b>Date</b>	<b>Version</b>	<b>Approval</b>	<b>Status</b>
March 2019	0.1	Full Council	Adopted

### Related Policies and Other References

<b>Policy Reference Code</b>	<b>Policy Name</b>
C7	Health and Safety Policy
CE5	IT & Cyber Security Policy
CE7	Press and Media Policy
HRP2	Additional Hours Policy
HRP4	Appraisal Policy
HRP7	Disciplinary Policy
HRP8	Display Screen Equipment Policy
HRP9	Equal Opportunities Policy
HRP10	Family Leave Policy
HRP13	Grievance Policy
HRP17	Probationary Period Policy
HRP21	Sickness Absence Policy
HRP22	Expenses Policy
HRP23	Training and Development Policy

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## **1. Welcome note from Steve Quayle, Town Clerk**

On behalf of Seaford Town Council, I am pleased to welcome you to the team. This handbook has been designed as a practical guide to support you in understanding your employment with the Council, the standards we uphold, and the policies and procedures that guide our work.

Seaford Town Council values its employees and recognises that our staff are fundamental to delivering high-quality services to the community. This handbook sets out the framework within which we work, promoting fairness, consistency, and transparency in all aspects of employment.

While this handbook provides an overview of key policies and practices, it is intended as a guide rather than a contractual document or a statement of policy. For more detailed information, reference is made to specific policies, which can be accessed via the hyperlinks provided.

I encourage you all to familiarise yourselves with its contents, as it will help you understand your responsibilities, your entitlements, and the support available to you. Together, we can continue to make Seaford Town Council an excellent place to work and a strong, trusted organisation for our community.

Steve



Seaford Town Council

## **2. Using the Staff Handbook**

The Staff Handbook has been written to provide you with key information about Seaford Town Council (STC), our culture, and important details relating to your employment. The handbook includes links to Council policies and procedures, which all employees are expected to follow as part of the STC team.

While some policies are also referenced in your contract, the Staff Handbook itself is not part of your contract. The Council may update or amend the handbook at any time, and any changes will be communicated to all staff.

You are expected to read the handbook carefully. If you have any questions or require clarification, please speak with your line manager or the Town Clerk.

### 3. Thriving in your role at STC

Seaford Town Council is committed to ensuring that employees enjoy their work while achieving their full potential. We believe that a positive and motivated workforce delivers the high-quality services our residents rely on and this is central to our purpose.

To support this, we aim to provide excellent working conditions and a range of employee benefits, outlined below. We also encourage and empower staff to perform at their best and welcome suggestions on how we can continue to improve the workplace for everyone.

Your wellbeing and job satisfaction are important to us, and we want you to feel valued and enjoy coming to work each day.

### 4. Employee Benefits

The Council offers its employees a number of benefits which includes:

- Membership of the Local Government Pension Scheme (LGPS), a defined benefit pension scheme which includes life insurance cover
- Time off in Lieu (TOIL) for extra hours worked
- Flexible working where possible
- Generous holiday entitlement
- Corporate membership rates at Wave Leisure
- Reduced price meals at The View, Seaford, with 20% discount on food, and 10% on drinks.
- Excellent working environment and conditions
- Free car parking, subject to availability of spaces
- Free uniform where applicable
- Access to free online training
- Availability of vocational qualifications where appropriate
- Free counselling service for all employees

### 5. Becoming part of STC

#### Induction

The Council is committed to providing you with all the support you need to settle into your role quickly and confidently.

Our induction programme will outline what to expect on your first day and subsequent weeks and months. During this time, you will meet your colleagues and receive important

information about the Council, your terms and conditions of employment, relevant policies and procedures, and health and safety requirements.

Your manager will review the program with you as part of your induction therefore if there is anything you need to know about the Council or your role, please do not hesitate to ask your line manager.

### Probationary period

On joining the Council, you will normally serve a six-month probationary period (unless stated otherwise in your contract). During this time, both you and your line manager will assess your suitability for the role.

Please refer to full policy [here](#). The ACAS Code on Disciplinary, Dismissal and Grievance Procedures do not apply during the probationary period.

### Personal Details

To ensure we can support you, particularly in emergencies, it is essential that your personnel records are complete, accurate, and up to date in line with General Data Protection Regulations (GDPR). Please notify the HR & OD Manager of any changes to your personal details or circumstances by completing the Change to Personal Details Form and emailing it to the HR & OD Manager.

Your personal information is treated confidentially and will not be shared with third parties without your consent. Personnel files are securely maintained by the HR & OD Manager and managed in line with the Council's Document Retention Policy.

### Secondary Employment

The Council recognises that employees may have opportunities to work with other organisations. However, your role with the Council is considered your primary employment and should not be adversely affected by any additional work.

You must obtain written permission from the Town Clerk before undertaking any secondary paid employment. This approval may also be granted by the Council's Personnel Committee by resolution.

The Council reserves the right to ensure that any other employment you undertake does not conflict with your duties, the standards required in your role, or the proper performance of public office. Employees must also ensure that all work, including secondary employment, complies with the Working Time Regulations, to avoid exceeding the maximum weekly working hours or compromising rest periods.

## 6. Pay

### Salary Scales

Seaford Town Council operates a salary scaling system, which will be clearly stated within your contract of employment. Any variations to this will be communicated to you

appropriately. All job roles are independently assessed and graded by an external provider to ensure equal pay rates for equal roles across the organisation. This process is currently contracted to East Sussex County Council's Job Evaluation Team

Please refer to your contract for clarity.

#### Payment of salaries

Salaries are paid by BACS transfer on or by the 25th day of each calendar month or the final working day before 25<sup>th</sup> if this falls on a weekend or Bank Holiday. An individual payslip will be provided, detailing all elements of your pay and any deductions.

You are required to submit a monthly timesheet (Time, Attendance & Pay – TAP Form) to your line manager by the 15th of each month. This must include any additional hours worked, sickness absence, and/or TOIL, and be signed by both you and your line manager. Failure to submit your timesheet on time may result in underpayment of any overtime claimed, which may not be able to be corrected until the following payroll cycle.

#### Deductions from salaries

Seaford Town Council will make any deductions from your pay as required by law or as authorised by you in writing. In addition, the Council reserves the right to make salary adjustments to your pay where an overpayment has been made or in cases of malicious damage which could result in dismissal.

#### Pension Scheme

The Council offers all its employees access to the Local Government Pension Scheme (LGPS).

A brief introduction to the LGPS is provided to you upon commencement of employment with STC or available upon request from either the Finance Manager or the HR & OD Manager.

In most cases, unless you opt out in writing, the Council is required by law to auto-enrol you in a workplace pension scheme. If you do not notify the Council of your wish to not opt-out before your first pay cycle, we will auto-enrol you into the LGPS scheme.

#### Hours of work

Your normal working hours are as stated in your contract. Although the Council does not encourage working beyond full-time hours, you will receive an opt-out form for the Working Time Regulations 1998, allowing you to work over the 48-hour weekly average at your discretion. For any shift of more than six hours, you must take at least a 30-minute unpaid rest break; this will be automatically deducted if not recorded on your monthly timesheet.

### Time Off In Lieu

Where employees are authorised to work beyond their contractual hours, time off in lieu (TOIL) may be granted. Please refer to the Council's Additional Hours Policy [here](#) for details.

## 7. Holidays

### Holiday entitlement

The Council provides at least 25 days of annual leave for all employees, in addition to public holidays per leave year (1 April – 31 March). Your exact entitlement depends on your contract type and your start date with STC, so please refer to your contract for details.

Unpaid leave is only approved in exceptional circumstances and must be authorised by the Town Clerk.

If you join the Council from another authority or qualifying public body, your previous service may be considered when calculating your holiday entitlement.

### Holiday year

The holiday period runs between 1 April and 31 March. Annual leave should not be carried over to the next leave year unless specifically approved by your line manager, with a maximum of one week of leave being permitted to be carried over, unless approved in exceptional circumstances. Any untaken leave will be forfeited without such approval.

### Public and Bank Holidays

Office-based employees receive all public holidays with pay, with pro-rata entitlement for part-time staff.

Golf Course employees are not automatically entitled to public or bank holidays but receive an equivalent allowance added to their annual leave, as outlined in their contract.

### Holiday booking

All annual leave must be approved in advance by your line manager, taking organisational needs into account. Requests should be submitted as early as possible; legally, you must give at least twice the notice of the leave requested (e.g., 2 days' notice for 1 day off). If a request is refused, your line manager will provide timely notice and reasons. Please refer to your contract for details on holidays and contract termination.

### Religious holidays

Seaford Town Council does not inquire about religion or discriminate against festival observances. Time off for these must be taken from your normal holiday entitlement.

## 8. Sickness Absence

Seaford Town Council is committed to employee wellbeing. If you are unwell, please follow the procedures outlined in the Sickness Absence Policy, which can be found [here](#).

## 9. Time off

### Special Leave Arrangements

Compassionate leave may be granted for hardship or special circumstances, such as bereavement, funeral or serious illness of a close relative or dependent. While you should use annual leave for personal matters, additional leave beyond statutory entitlement may be approved at the Town Clerk's discretion. Each request is considered individually, and as much notice as possible should be given. Unpaid leave is generally only permitted in these exceptional circumstances.

### Maternity, Paternity and Adoption

Seaford Town Council recognises this leave as an important time for parents. Please refer to the policy [here](#) for full details.

### Time off to deal with a family emergency

All employees are entitled to reasonable unpaid leave or TOIL to deal with a dependant emergency, such as illness, injury, or care breakdown. You must notify your line manager as soon as possible.

### Parental leave

To qualify for parental leave, you must have completed a year's service please see details in the policy [here](#).

### Flexible working

Flexible working, available from the first day in the role, is a way of working that suits an employee's needs, for example having flexible start and finish times or working from home. To request for this, please email your line manager in the first instance, who will discuss with the HR & OD Manager to support the employee's request.

The Council has resolved that no officers should work from home for more than half their weekly working hours, except in special circumstances or due to temporary reasonable adjustments.

### Time Off for Public Duties

Employees must inform the Council of any public positions when accepting a role or upon taking the position. Requests for time off for public duties may be granted with or

without pay, at the Town Clerk's discretion, considering prior time off and organisational impact.

Employees are free to join a trade union. Recognised trade union representatives will be allowed reasonable paid time off to carry out industrial relations duties.

#### Studies/Training

The council is dedicated to developing its employees. The full Training and Development Policy can be found [here](#).

## 10. Supervision and Appraisal

Your line manager is responsible for coaching and guiding you. The appraisal policy provides key details on the employee appraisal process.

Please see the full policy [here](#).

## 11. Performance and Behaviour at Work

#### Conduct at Work

Employees are expected to always behave appropriately, including when representing the Council offsite or at external events. Professionalism and courtesy are essential, especially in customer-facing roles or when interacting with suppliers, contractors, councillors, and colleagues.

Any concerns about your conduct will be discussed by your line manager. If you have concerns about another employee, raise them with your line manager or HR & OD Manager. Persistent or serious conduct issues may lead to the Council's Disciplinary Procedure being invoked following a thorough investigation.

#### Appearance

Seaford Town Council respects individual choice in appearance but expects employees to dress appropriately for their role and maintain good personal hygiene.

Golf Course staff must wear the correct uniform and name badge. Any Council-provided apparel must be worn when required and kept clean and presentable. Questions about appropriate dress should be directed to your line manager or the HR & OD Manager.

#### Council Premises

You may be issued with an identity badge or PIN for workplace access, which remains Council property. Any loss or accidental disclosure must be reported immediately to your line manager or the Town Clerk. Unauthorised persons must not be brought onto Council property without prior approval. If authorised, you are responsible for supervising visitors

and ensuring they do not access restricted areas or property. Council property must not be removed from the premises without prior permission from your line manager.

### Personal Property

Any personal property, including jewellery, cash, vehicles, or other valuables, left on Council premises or in Council vehicles is at your own risk. You are advised not to leave valuables unattended. Seaford Town Council accepts no liability for loss or damage to personal property.

### Telephones and Correspondence

Council phones, mobiles, and postal services must not be used for personal purposes. Misuse may lead to disciplinary action.

### Use of Computers

The Acceptable Use of Computer, Internet and email facilities can be found [here](#) and the Council's Display Screen Equipment policy is also available [here](#)

### Data Protection and Confidentiality

The Council is responsible for safeguarding all personal data under the General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. Please see full policy [here](#)

### Smoking

To ensure the health, safety, and comfort of employees and customers, the Council enforces a no-smoking policy, including electronic cigarettes. Smoking inside Council premises will be considered gross misconduct which may result in disciplinary action.

### Consumption of Alcohol and Drug Abuse

The Council prohibits alcohol consumption and drug use or storage on its premises, and employees must not work under their influence. Breaches may result in disciplinary action, including summary dismissal.

### Professional Conduct and Public Statements

Employees must act in good faith, promote the Council's reputation, and always behave responsibly and trustworthily.

No employee may give media interviews or contribute to publications about the Council or its intellectual property without prior approval from the Town Clerk. See the Council's Press & Media Policy [here](#) for details.

### Conflict of Interest

You must not engage in any outside business or activity that conflicts with your duties or the interests of Seaford Town Council. Any actual, apparent or potential conflict of interest must be reported immediately to the Town Clerk.

Conflicts may arise if an activity:

- Provides or receives products/services to/from the Council.
- Demands time that prevents you from fulfilling your Council responsibilities.
- Could negatively affect the Council's reputation.

If unsure whether an activity poses a conflict, discuss it with the Town Clerk.

### Mobile Phones

To avoid disruption, personal mobile phones should only be used in emergencies and should be switched off or silenced during working hours. Work landline numbers may be provided to friends and family for emergency use.

### Expenses

Seaford Town Council recognises that no member of staff, paid or unpaid, should be placed at financial disadvantage as a result of their work for the organisation. Please see the full policy [here](#).

## 12. Disciplinary Procedure

Seaford Town Council expects high standards of behaviour and performance from its employees. The Disciplinary Process can be found [here](#) which explains everything in more detail.

## 13. Grievance Policy

Seaford Town Council's aims to encourage its employees to have great relationship with both colleagues and line managers. Where this fails, there is a grievance process and policy [here](#) to address such matters.

## 14. Equal Opportunities

The policy of the Council is to promote equality, harmony and respect amongst individuals and to eliminate discrimination, harassment and victimisation of all kinds. Please find the full policy [here](#).

## 15. Health and Safety

Seaford Town Council has a legal duty to protect the health and safety of its employees and others. Please refer to the full policy [here](#).

## 16. Termination of Employment

### Termination

If you resign, you must give written notice as required in your contract. If the Council ends your employment, you will be notified in writing and pay in lieu of notice may be given in line with your contract.

The Council may place you on 'garden leave', during which you will not work but will retain all contractual benefits.

### Retirement

The Council has no fixed retirement age. Regular appraisals provide an opportunity to discuss future plans, including retirement, if desired.

If you intend to retire, please try to inform your line manager at least six months in advance so necessary arrangements can be made.

DRAFT



## Seaford Town Council

<b>Report No:</b>	<b>182/25</b>
<b>Agenda Item No:</b>	<b>10</b>
<b>Committee:</b>	<b>Full Council - Extraordinary</b>
<b>Date:</b>	<b>18 March 2026</b>
<b>Title:</b>	<b>Revisions to the 2026 – 2027 Meeting Timetable</b>
<b>By:</b>	<b>George Raeburn, Senior Committee Clerk</b>
<b>Purpose of Report:</b>	<b>To seek approval of revisions to the 2026 – 2027 Meeting Timetable</b>

### **Actions**

#### **Full Council is advised:**

1. To consider the proposed date changes for the 2026 – 2027 Annual Meeting and Planning & Highways Committee meeting in May 2026.
2. To move to a vote on the motion below.

### **Recommendations**

#### **Full Council is recommended:**

1. To approve the revised dates as presented within report 182/25.

## **1. Introduction**

- 1.1** Following the recent announcement that the East Sussex County Council elections will be held on Thursday 7 May 2026, the Town Council needs to revise its 2026 – 2027 Meeting Timetable to avoid clashing with the elections.
- 1.2** Given that this involves a change to the 2026 – 2027 Annual Meeting, and the helpful timing of this Extraordinary Full Council meeting, officers felt it best practice to present the proposed changes to Full Council for approval, rather than making this decision under delegated powers.

## **2. Information**

- 2.1** The Town Council's 2026 – 2027 Annual Meeting is currently scheduled for Thursday 7 May 2026. Following consultation with the Mayor and Deputy Mayor, the proposal is to change this meeting date to Thursday 14 May 2026. This change avoids holding a meeting within the elections week and also keeps to the usual Town Council meeting day of Thursday.
- 2.2** As it stands, the Planning & Highways Committee is scheduled to meet on Thursday 14 May 2026. Following consultation with the Chair and Vice Chair of that Committee, the proposal is to change this meeting date to Tuesday 12 May 2026.
- 2.3** This change keeps the gap between meetings as close to four weeks as practicable and enables plenty of time after the Annual Meeting for any newly appointed Committee members to 'find their feet' before their first meeting on 11 June 2026.
- 2.4** Full Council is asked to approve these two changes to the 2026 – 2027 Meeting Timetable.

## **3. Financial Appraisal**

- 3.1** There are no direct financial implications as a result of this report.

## **4. Contact Officer**

- 4.1** The Contact Officer for this report is George Raeburn, Senior Committee Clerk.



## Seaford Town Council

<b>Report No:</b>	<b>185/25</b>
<b>Agenda Item No:</b>	<b>11</b>
<b>Committee:</b>	<b>Full Council - Extraordinary</b>
<b>Date:</b>	<b>18 March 2026</b>
<b>Title:</b>	<b>Annual Review of Corporate Risk Register 2025 - 2026</b>
<b>By:</b>	<b>Darryl Keech, Deputy Town Clerk &amp; Responsible Financial Officer</b>
<b>Purpose of Report:</b>	<b>To review and approve the Town Council's Corporate Risk Register and subsequent action plans</b>

<b>Actions</b>
<b>Full Council is advised:</b>
<ol style="list-style-type: none"><li>1. To review and comment on the Town Council's Corporate Risk Register.</li><li>2. To move to a vote on the motions below.</li></ol>

<b>Recommendations</b>
<b>Full Council is recommended:</b>
<ol style="list-style-type: none"><li>1. To note the review of the Town Council's Corporate Risk Register.</li><li>2. To adopt the revised General &amp; Financial Risk Assessment as presented in Appendix A, noting that officers will update this to the new policy format prior to publication.</li></ol>

### 1. Caveat

- 1.1 This report would have routinely progressed through the Finance & General Purposes (F&GP) Committee before being recommended to Full Council for adoption. Officers have recently discovered that this document must be reviewed by Full Council once per financial year (April – March) and due to

Quarter 4's Full Council meeting falling in April, this meeting is the last chance for Full Council to review the document within the correct timescale.

## **2. Introduction**

- 2.1** Local councils are responsible for establishing proper arrangements for the governance of their affairs and the stewardship of their resources. Part of good governance is the annual review of the Town Council's Corporate Risk Register, including general and financial risk.
- 2.2** The Smaller Authorities' Proper Practices Panel Practitioners' Guide recommends that once per financial year Full Council should:
- Take steps to identify and update its record of key risks facing the Town Council
  - Evaluate the potential consequences to the Town Council for if an event takes place that is identified as a risk
  - Decide upon measures to avoid, reduce or control the risk or its consequences, and
  - Record any conclusion or decision reached.
- 2.3** This report is presenting Full Council with an update on how the Town Council's corporate risks are managed and monitored.
- 2.4** It must be highlighted that this report relates to corporate (general and financial) risks rather than drilling down to the level of risk assessments of specific activities, projects and / or assets. These risks are assessed dynamically, and steps are put in place to mitigate and control identified risks.
- 2.5** Due to the timelines for the short turnaround of this meeting, the revised General & Financial Risk Assessment has been reviewed in its original format. Once approved, it will be transferred into the new format prior to publication.

## **3. Corporate Risk Register**

- 3.1** Risk management is the process whereby local councils methodically address the risks associated with what they do and the services that they provide. Identifying things that could go wrong and taking the appropriate steps to avoid this or manage the consequences where the risk cannot be avoided.

- 3.2 The Town Council uses the Local Council Risk System (LCRS) software to record and assess its corporate risks and controls.
- 3.3 Within LCRS, if a risk has a score of more than 4 then an action plan is created.
- 3.4 The current risks have been reviewed and updated by the Town Council's officers. This year no risk has a score of 4 or above so there is no requirement for an action plan. To confirm, the controls in place have mitigated the level of the risk.
- 3.5 The full Risk Register (61 pages) can be circulated to members electronically, should they wish to read the entire document.

#### Calculating Risk Score

- 3.6 Each year, Town Council officers review each risk and assign it two separate values between 1 and 3 (1 being low, 2 medium, and 3 high): one for the likelihood of the risk and the other for the impact of the risk. These scores are then multiplied together.
- 3.7 The risk score is calculated as:  
(the likelihood of the risk happening) × (the impact of the risk)  
E.g.  
Likelihood = Low 1  
Impact = Medium 2  
Risk score is 1 x 2 = 2, therefore no action is required

### **4. General & Financial Risk Assessment**

- 4.1 The Town Council originally adopted its General & Financial Risk Assessment in March 2017 as a document that should be reviewed annually and it was most recently updated in March 2024.
- 4.2 This is a working document and has been changed as the need arises throughout the year. Officers have reviewed and updated the document as necessary - this is included at **Appendix A**.
- 4.3 Please note that this will continue to remain a working document that will be updated in the future as the need arises.

### **5. Annual Governance Statement**

- 5.1 Councils are expected to make a number of representations and assertions in eight statements of assurance, which together comprise the Annual Governance Statement, about the accountability of the council.

**5.2** The Statements below relate to this report:

<b>Statement</b>	<b>Explanatory note</b>
5. 'We carried out an assessment of the risks facing the Council and took appropriate steps to manage those risks, including the introduction of internal controls and/or external insurance cover where required' 6. 'We maintained throughout the year an adequate and effective system of internal audit of the accounting records and control systems.'	These representations cover the Council's responsibility to develop, implement and regularly monitor the effectiveness of systems of internal control covering: <ul style="list-style-type: none"><li>• The overall control environment, including Internal Audit.</li><li>• The identification, evaluation and management of operational and financial risks.</li><li>• Budgetary control and monitoring arrangements; and</li><li>• The documentation and application of control procedures</li></ul>

**5.3** This review of the Corporate Risk Register provides the assurance required for Full Council to approve the Annual Governance Statement in June 2026.

**6. Financial Appraisal**

**5.1** This report has no direct financial implications.

**7. Contact Officer**

**7.1** The Contact Officer for this report is Darryl Keech, Deputy Town Clerk & Responsible Financial Officer.



## Seaford Town Council

### General & Financial Risk Assessment

<b>Policy Ref.</b>	F5
<b>Date Last Adopted</b>	March 2025
<b>Date of Next Review</b>	March 2026
<b>Possible Prompts for Earlier Review</b>	<ul style="list-style-type: none"> <li>• Due to its nature, amendments to this policy document are tracked throughout the year by officers, to be presented as one review each March</li> </ul>
<b>Previous Adoption Dates</b>	March 2024 March 2023 March 2022 March 2021 July 2020 July 2019 March 2017 February 2014
<b>Author</b>	Responsible Financial Officer

**General and Financial Risk Assessment**

Area	Risk	Level	Controls (bold indicates where work is needed)	Frequency months
Assets	Protection of physical assets detailed in the Council's Asset Register	H	<p>All assets over a value of £1,000 are insured through Zurich Municipal, unless previously agreed by Full Council not to insurance (e.g Skate Park)</p> <p>As new assets are purchased over £1,000 in value, they are added to the policy. The Department Manager to advise Finance team as soon as a project is completed to enable project to be insured if necessary.</p> <p><b>All assets to be uploaded to new asset management system Civic.ly for greater visibility and management from June 2026</b></p>	As and when
		M	<p>All leases and land registration details that are in the Council possession and are kept by the Assets and Contracts Manager. Some original documentation is held by the Council's Solicitors. There are however several historical issues outstanding with regards to land ownership.</p> <p>1 Some documentation is missing. 2 Some parcels of land in the Council's ownership have not been registered with Land Registry. 3 Secure details of all land documents held by Solicitors.</p> <p><b>Assets &amp; Contracts Manager progressing for work. Registration timelines for HMLR are between 6-12 month currently</b></p>	12

Area	Risk	Level	Controls (bold indicates where work is needed)	Frequency months
Assets	Security of buildings, equipment etc	M	Where possible buildings have alarm systems and CCTV installed. All offices routinely locked overnight. All assets at Seaford Head Golf Course are securely stored. Planned programme of testing electrical and safety equipment in place.	Daily
Assets	Maintenance of buildings etc	M	Planned ongoing maintenance schedule is worked to. Planned programme of testing electrical and safety equipment in place. <b>Transfer of assets and inspections on to new Asset Management System to be completed by June 2026</b>	1
		M	Reactive repair allocations included in revenue budget, pool of suitable contractors to carry out works in place. Review of contractors was completed and updated December 2025	1
Finance	Banking	M	The Council's bank accounts are in place with the Cooperative Bank and CCLA's Public Sector Deposit Fund. These are reconciled every month in accordance with the Financial Regulations.	1
Finance	Risk of consequential loss of income	L	Insurance cover in place for insurable risks	12
		H	Uninsured risks (e.g. pandemic) – expenditure reduced, grants applied for and robust reserves.	1

Area	Risk	Level	Controls (bold indicates where work is needed)	Frequency months
		H	General Reserves to be at least 50% of the precept.	Annually
		H	Earmarked Reserves increased for contingent liabilities (e.g. Building maintenance).	Annually
		H	Financial performance of all activity reviewed monthly to enable any issues to be speedily addressed.	1
		M	Committees consider in detail draft budgets. Councillor briefing reviews all potential financial issues to ensure all relevant information is present at the Full Council where the annual budget and precept are determined.	Annually
		M	Precept paid 6 monthly.	6
		L	RFO or Finance Manager checks bank statements to ensure all payments are received.	1
Finance	Loss of cash through theft or dishonesty	M	Petty cash at Council Offices is managed in accordance with adopted procedures, which requires receipts for all purchases. Reconciled every month.	1

Area	Risk	Level	Controls (bold indicates where work is needed)	Frequency months
		H	All cash from tills at the Golf Course is reconciled with till reading every evening and banked promptly following all internal control procedures. <b>By December 2026 the Town Council will have moved towards an online system that will reduce the number of cash transactions and other payments being processed by the third-party Golf Professional service provider</b>	Daily
		L	Mayor's charity pots - procedures in place for secure collection and banking, in accordance with National guidelines.	As required
		M	Cash only used where absolutely necessary - payment by BACs or debit card the norm. Golf course still taking significant cash payments. <b>By December 2026 the Town Council will have moved towards an online system that will reduce the number of cash transactions and other payments being processed by the third-party Golf Professional service provider</b>	1
Finance	Financial controls and records	L	Strict internal controls in place to separate functions relating to all form of payment transactions including electronic, debit cards and cheques. Two councillors required to sign, as well as at least two separate officers.	Daily
		L	Internal Audit twice per annum, External Audit annually.	4/6/12

Area	Risk	Level	Controls (bold indicates where work is needed)	Frequency months
		L	Audit reports to be presented to the next available Finance & General Purposes (F&GP) Committee meeting, all recommendations acted upon as soon as practical and reported back to F&GP Committee.	4
		L	All electronic financial records are backed up daily by the server. <b>Moved to Cloud based system March 2026.</b>	Weekly
		M	Tenders secured for contracts when required in accordance with Financial Regulations and Procurement Act 2023 were appropriate.	As required
		M	All financial records stored and saved in accordance with Council's Document Retention Policy.	12
		L	Internal Controls are reviewed annually.	12
Finance	Comply with HMRC VAT Regulations	L	VAT payments and reclaims to be calculated by the Finance Manager or RFO, quarterly.	3
		L	VAT reconciled monthly and claimed quarterly.	12
		L	Advice notes from HMRC followed at all times, use external advice where necessary.	12
		L	Internal auditor reviews VAT on a regular basis.	12
		M	Carry out annual Partial Exemption Calculations. Consultant engaged to complete assessment annually. <b>Consultant completing review February/March 2026</b>	12

Area	Risk	Level	Controls (bold indicates where work is needed)	Frequency months
Finance	Sound budgeting to underlie annual precept	M	The RFO in consultation with the budget managers and Committee Chairs develop committee budgets based on previous performance and plans for the future. These are presented to the relevant committee for consideration and recommendation to F&GP which recommends the whole budget to Full Council. A briefing meeting is held with all Councillors to assess the committee proposals and ensure that all potential contingencies are addressed in the final report. Draft figures go to the Full Council meeting in January to set the precept, avoiding any potential last-minute proposals that cannot be financially assessed ensuring financial diligence is retained.	12
		L	Expenditure against budget reported to relevant committee at least every quarter.	3
		M	Budget managers to ensure that spend does not go over budget. <b>Upgraded Purchase Order system to be introduced that will ensure that orders cannot be raised where a budget is not in place. To be in place by December 2026</b>	1
Finance	Complying with borrowing restrictions	L	Public Works Loans Board are paid automatically via Direct Debit every six months.	6
		L	Any new loans require Full Council approval after presenting a full business case.	As required

Area	Risk	Level	Controls (bold indicates where work is needed)	Frequency months
Liability	Risk to third party, property or individuals	M	Insurance in place with Zurich Municipal & Golfguard. <b>Both are due for renewal in April 2026 – the Assets &amp; Contracts Manager is reviewing these February/March 2026</b>	12
		M	Full health and safety programme of inspections of all property and land is in place and carried out by a NEBOSH qualified officer. <b>Transfer of assets and inspections on to new Asset Management System to be completed by June 2026</b>	Weekly
		M	A NEBOSH qualified officer routinely undertakes risk assessments of all individual events such as Seaford Christmas Magic, Armed Forces Day and Remembrance services.	As required
Liability	Safeguarding risks with relevant Council activities, where vulnerable adults or children are concerned.	M	An appointed Welfare Officer to ensure safeguarding requirements and processes are in place for Salts Tennis Courts activities. Refresher training to be undertaken every 3 years. Another officer trained to deputise in Welfare Officer's absence. A Town Council Safeguarding Tennis Policy adopted in line with Lawn Tennis Association (LTA) guidelines.	36 / As required
		M	Permissions sought from members of the Youth Ambassador Board parents/guardians upon taking office, relating to a number of different duties and activities. Regular communication maintained with parents/guardians by relevant officers within the Civic Office. Officers supporting the Board will undertake enhanced DBS checks.	Annually

Area	Risk	Level	Controls (bold indicates where work is needed)	Frequency months
		M	A Golf Professional and their support staff, where required have relevant safeguarding training for the activities involving junior members / visitors at Seaford Head Golf Course.	36 / As Required
		M	An overarching Safeguarding Policy to be devised in 2025 - 2026 and adopted, addressing safeguarding arrangements across all of the Town Council's activities <b>This has not been completed but is a priority for 2026 - 2027</b>	Tbc
Liability	Legal liability as consequence of asset ownership.	H	Insurance in place with Zurich Municipal & Golfguard <b>Both are due for renewal in April 2026 – the Assets &amp; Contracts Manager is reviewing these February/March 2026</b>	12
		M	Full health and safety programme of inspections of all property and land is in place and carried out by a NEBOSH qualified officer. <b>Transfer of assets and inspections on to new Asset Management System to be completed by June 2026</b>	As required
		M	Annual checks are made by the Play Inspection Company of all play equipment and reports issued to the Town Council.	12
		M	Play areas also inspected weekly by Lewes District Council's Neighbourhood First team	Weekly
Liability	Legal liability as consequence of personal data controlled / processed.	L	An appointed internal Data Protection Officer (the HR &OD Manager), with access to relevant training and resources.	As required

Area	Risk	Level	Controls (bold indicates where work is needed)	Frequency months
		H	Initial training for all councillors and staff on data protection legislation and requirements and understanding of roles where personal data is concerned. Annual refreshers of responsibilities to be arranged. All officers have completed their training. <b>Councillor training outstanding, to be completed by June 2026</b>	12
		H	Adequate processes in place to ensure security of personal data being processed by both councillors and staff.	12
		L	Adequate process in place for handling Subject Access Requests	36
		M	Privacy notices displayed explaining why personal data is collected, how it is used and stored. <b>This has been added to Golf Membership Forms for use from March 2026</b>	As required
Employer Liability	Comply with Employment Law.	H	Membership of various national and regional bodies including NALC, SLCC, BIGGA, CIPD to ensure managers are kept up to date with all relevant employment requirements and legislation as well as best practice.	As required
		L	Subscribing to HMRC information emails and bulletins.	Weekly
		M	Ensure employee's terms & conditions comply with employment law.	As required

Area	Risk	Level	Controls (bold indicates where work is needed)	Frequency months
		H	Annual Appraisals take place with all employees. <b>None completed in 2025 - 2026 but scheduled for April/May 2026</b>	12
		L	Central records retained of all employee sickness absence and holidays. <b>Upgrade to new HR Information System in April 2026 will ensure better records and compliance.</b>	As required
		M	All digital records can only be accessed by necessary managers to ensure compliance with the data protection legislation.	As required
		L	Routine reviews of employment terms and conditions acted on or where necessary reported to the Personnel Committee for action	As required
		M	Ensure all staff and councillors* involved with employment relations or processes have access to relevant training and resources. * Could change after each annual meeting and the appointment of committees. Relevant training will form part of the standard training list for relevant councillors. <b>Provide Councillors with direct access to all HR policies in the same way as officers</b>	12
Employer Liability	Comply with Inland Revenue requirements.	M	Regular review of current legislative requirements undertaken by managers. Internal auditor undertakes regular review.	As required

Area	Risk	Level	Controls (bold indicates where work is needed)	Frequency months
Employer Liability	Safety of staff and visitors.	M	Risk assessments carried out for all premises and activities undertaken by employees and visitors. <b>A review of all risk assessments to be undertaken by July 2026</b>	As required
		M	Internal training undertaken on the job and on a regular basis formally when need arises.	As required
Legal Liability	Ensuring activities are within legal powers.	M	Proper Officer to clarify legal position on any new proposal, including assessing any permissions required are sought and/or relevant legislation compiled with.	As required
		M	Legal advice to be sought where necessary.	As required
		L	Council to maintain General Power of Competence eligibility, which collectively gives the Council the power to do anything that and individual may do, as long as it does not break any laws.	As required
Legal Liability	Proper and timely reporting via the minutes.	L	All agendas are issued and displayed in accordance with the Local Government Act 1972 and/or other relevant legislation.	As required
		L	Council meets regularly and, at ordinary Full Council meetings, always receives and approves minutes of meetings held since the last meeting including all committee minutes.	2
		L	Minutes made available to press and public via the Town Council website and email distribution.	As required

Area	Risk	Level	Controls (bold indicates where work is needed)	Frequency months
Legal Liability	Proper document control.	M	Original Deeds and leases stored with Barwells Solicitors and within Town Council offices. <b>Work needed to confirm this is correct, Assets &amp; Contracts Manager compiling all relevant details for review in 2026 - 2027.</b>	As required
		M	Copies retained within the Council Offices and stored in accordance with the adopted Document Retention Policy. <b>Work needed to confirm this is correct, Assets &amp; Contracts Manager compiling are relevant details for review in 2026 - 2027.</b>	36
Councillors	Registers of Interests, gifts and hospitality not in place.	M	Register of Disclosable Pecuniary Interest is retained in the Council Offices by the Town Clerk and sent to the Monitoring Officer at Lewes District Council who is responsible for the management and publishing of the register.	12
		M	Declaration of interest is on the agenda at every meeting.	1
		M	If circumstances change, updating register of interests is the responsibility of the individual councillor.	1
		M	Register of interests emailed out annually to all councillors to ensure up to date.	12

Area	Risk	Level	Controls (bold indicates where work is needed)	Frequency months
		H	Register of Gifts & Hospitality retained in Council Offices by the Town Clerk for use by councillors and Council employees. Published annually on website. Gifts & Hospitality Policy adopted by Council.	12

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## Seaford Town Council

<b>Report No:</b>	<b>186/25</b>
<b>Agenda Item No:</b>	<b>12</b>
<b>Committee:</b>	<b>Full Council - Extraordinary</b>
<b>Date:</b>	<b>18 March 2026</b>
<b>Title:</b>	<b>Annual Review of Internal Controls 2025 - 2026</b>
<b>By:</b>	<b>Darryl Keech, Deputy Town Clerk &amp; Responsible Financial Officer</b>
<b>Purpose of Report:</b>	<b>To seek Full Council's review and approval of the Town Council's Internal Controls</b>

### **Actions**

#### **Full Council is advised:**

1. To review and comment upon the Town Council's Internal Controls.
2. To review and consider Statements 2, 5, 6, 7 and 10 of the Annual Governance Statement to assess that these have been complied with.
3. To move to a vote on the motions below.

### **Recommendations**

#### **Full Council is recommended:**

1. To approve the Town Council's Internal Controls as set out in Appendix A.
2. To note that Statements 2, 5, 6, 7 and 10 of the Annual Governance Statement have been complied with, as set out in 1.4 of this report.

## **1. Caveat**

- 1.1** This report would have routinely progressed through the Finance & General Purposes (F&GP) Committee before being recommended to Full Council for adoption. Officers have recently discovered that this document must be reviewed by Full Council once per financial year (April – March) and due to

Quarter 4’s Full Council meeting falling in April, this meeting is the last chance for Full Council to review the document within the correct timescale.

## 2. Information

- 2.1 Local councils are responsible for establishing proper arrangements for the governance of their affairs and the stewardship of their resources. Key to good governance is the annual review of the Town Council’s Internal Controls, including measures designed to prevent and detect fraud and corruption.
- 2.2 Part of this process is performed by the Internal Auditor who performs tests to check the effectiveness of the Internal Controls.
- 2.3 The Town Council’s Internal Controls have been reviewed by officers and are attached as **Appendix A** for Full Council to review, comment upon and approve.
- 2.4 At this point in time, Full Council is asked to review the internal controls that have existed for the current, 2025 – 2026, financial year.
- 2.5 Going forwards, the intention is to review the Internal Controls annually in June – allowing Full Council to review these systems towards the beginning of the financial year that they relate to. Full Council will therefore be asked to review the Internal Controls again at its meeting on 25 June 2026 in relation to the 2026 - 2027 financial year.
- 2.6 In addition to a review of the Internal Controls, councils are expected to make a number of representations and assertions in eight statements of assurance, which together comprise the Annual Governance Statement, about the accountability of the Town Council. The statements in the table shown below relate to this report. To confirm, the review of Internal Controls gives the Town Council the assurance required to approve the Annual Governance Statement at its meeting in June 2026.

Statement	Explanatory note
2. ‘We maintained an adequate system of Internal Control, including measures designed to prevent and detect fraud and corruption and review its effectiveness’	This statement covers the Council’s responsibility to ensure its affairs are managed in accordance with proper standards of financial conduct and that arrangements exist to prevent and detect

	<p>fraud and corruption. The Council also asserts that it has tested those arrangements at least once in the year to make sure that they are working in an adequate and effective way</p>
<p>5. 'We carried out an assessment of the risks facing this authority and took appropriate steps to manage those risks, including the introduction of internal controls and/or external insurance cover where required'</p> <p>6. 'We maintained throughout the year an adequate and effective system of Internal Audit of the accounting records and control systems.'</p> <p>7. 'We have taken appropriate action on all matters raised in reports from Internal and External audit.'</p>	<p>These representations cover the Council's responsibility to develop, implement and regularly monitor the effectiveness of systems of internal control covering:</p> <ul style="list-style-type: none"> <li>• The overall control environment, including Internal Audit;</li> <li>• The identification, evaluation and management of operational and financial risks;</li> <li>• Budgetary control and monitoring arrangements; and</li> <li>• The documentation and application of control procedures</li> </ul> <p>The 2024 – 2025 Annual Governance and Accountability Return (AGAR) raised no formal issues, however outstanding issues from 2023 – 2024 have not yet been finalised by the External Auditor</p>
<p>10. 'We are managing digital systems, information and personal data responsibly, lawfully and securely'.</p>	<p>This statement covers the Council's need to demonstrate that it:</p> <ul style="list-style-type: none"> <li>• Uses appropriate and secure digital systems for Council business</li> <li>• Protects personal data in line with legal requirements</li> <li>• Provides accessible and transparent information to the public</li> <li>• Has appropriate policies, procedures and oversight in place</li> </ul>

	<p>The Council has spent the last six months reviewing all procedures, systems, processes (including websites) and implementing training to ensure compliance.</p>
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### **3. Financial Appraisal**

2.1 There are no direct financial implications as a result of this report.

### **4. Contact Officer**

4.1 The Contact Officer for this report is Darryl Keech, Deputy Town Clerk & Responsible Financial Officer.

## SEAFORD TOWN COUNCIL

## INTERNAL CONTROLS 2025 - 2026

INTERNAL CONTROL	RESPONSIBILITY
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**Minutes**

Check quorum present for each Full Council and committee meeting	SCC / Meeting Clerk
Pages in minutes books sequentially numbered	SCC
Draft minutes reviewed by Meeting Clerk and Chair	SCC / Meeting Clerk / Chair
Full Council approval of all Full Council and committee meeting minutes	SCC
Check original minutes properly signed	SCC

**Assets & Investments**

<b>1. Assets</b>	
Register of all Council assets kept and updated at least annually	ACM / OFM / HOP / DTC & RFO
Asset Register as per final accounts and Annual Governance and Accountability Return (AGAR)	ACM / FM
<b>2. Investments</b>	
Chair of F&GP to check monthly with bank reconciliation	Chair of F&GP

**Income**

<b>1. Cash</b>	
Cash banked frequently, at least once per week	FO / FM
<b>2. Credit Income</b>	
Check bookings match invoicing	FO / FM
<b>3. Credit Control</b>	
Check debtor balances monthly	FO / FM
<b>4. Bad Debts</b>	
Review reasons for non-payments	FO / FM
Check all reasonable steps taken to collect debts	FO / FM
List of outstanding debtors presented to each F&GP Committee	FM
F&GP Committee authority obtained for bad debts written off	DTC & RFO / FM

**Cash & Bank**

<b>1. Receipt of Money- Admin Office</b>	
Banked promptly - kept in locked tin up to £250	FO / FM
Most income is received by bank transfer	FO / FM

## SEAFORD TOWN COUNCIL

## INTERNAL CONTROLS 2025 - 2026

INTERNAL CONTROL	RESPONSIBILITY
<b><u>2. Receipt of Money- Golf Course</u></b>	
Locked till	All Pro Shop Staff
Cash removed from locked till to fire proof safe over night	All Pro Shop Staff
All cash kept in locked safe or till	GP
All cash reconcilled to accounts	GP
Collection of cash and banked weekly	GP / FO
<b><u>3. Bank Reconciliation</u></b>	
Performed at least on a monthly basis and all bank accounts agreed	FM
Check and ensure no payments or receipts are being carried forward for a number of months	FM
Chair of F&GP to check and sign monthly with corresponding bank statements reported to committees	FM / Chair of F&GP
Review cheques outstanding for over 6 months and ensure written off	FM

**Payments**

<b><u>1. Payments</u></b>	
Purchase order books kept securely and allocated to specific staff members	FM / FO
Purchase orders raised for the majority of purchases	Authorised staff / FM
Purchase orders authorised by approved budget holder as specified in policy F11 Purchase Ordering & Payment For Goods & Services Policy.	DTC & RFO / Budget holder
Control copy of purchase order kept in separate file	FO
Purchase orders and delivery notes checked against invoice before payment	Budget holder / FO
Invoice approved by budget holder before payment	Budget holder / FM
DTC & RFO or FM to authorise all invoice payments	DTC & RFO / FM
Two councillor signatories required for each payment	FM / FO
Payment schedule signed / authorised by email by RFO and two authorised signatories	DTC & RFO / FM / FO
Security of cheques and petty cash - stored in locked room when key staff are out of the office	FM
Majority of payments by BACS. One person inputs and another authorises. Impossible for one person to make a payment with the online banking set up - need two people using their own personal fob	DTC & RFO / FM / FO

## SEAFORD TOWN COUNCIL

## INTERNAL CONTROLS 2025 - 2026

INTERNAL CONTROL	RESPONSIBILITY
<b><u>2. Petty Cash</u></b>	
Examine petty cash expenses and check balances	FM
Check VAT is appropriately claimed on petty cash receipts	FM
Regular frequency of reconciliation	FM / FO
Check approval of receipts and reimbursements	FM
<b><u>3. Debit Card payments</u></b>	
Debit cards issued to staff members approved by Full Council	FM
Staff members responsible for own card	Debit card holder
FO updates spreadsheet and codings, councillors given sheet and receipts each month to sign	FO / FM
Debit cards issued with an appropriate daily spend cap (including a daily ATM withdrawal limit of £250 permitted solely for replenishing petty cash)	FM
Debit cards used only when necessary as payment via BACS is the first choice of payment	Debit card holder / FM

**Payroll**

Prepare contracts of employment for all staff	DTC & RFO / HR&ODM
Check gross pay for each employee is at correct rate	DTC & RFO / HR&ODM
Check sick leave/pay against reporting mechanism and Time & Attendance (TAP) forms	HR&ODM
Check annual leave/pay against reporting leave cards and TAP forms	HR&ODM
Check any statutory deductions e.g. statutory sick pay, maternity pay, paternity pay, adoption pay et.c	HR&ODM / FM
TC approval for new starters	TC / HR&ODM
FM to produce monthly salary sheet	FM
DTC & RFO to countersign payroll and list of payments made	DTC & RFO
Two councillors sign and approve list of payments	CLLRS / FM
Internal audit to audit annually	FM
Line manager authorises all overtime and mileage countersigned by DTC & RFO	DTC & RFO / Line Managers
Salaries budget reviewed annually by Council	TC / DTC & RFO / HR&ODM / Full Council

**Supplier Invoices**

Check purchase orders and delivery notes match invoices	FO
Check purchase orders authorisation	FO
Check unmatched purchase orders	FO

## SEAFORD TOWN COUNCIL

## INTERNAL CONTROLS 2025 - 2026

INTERNAL CONTROL	RESPONSIBILITY
Check expenditure coding - correct budget head and cost centre	FO / FM
Check authorisation for payment of invoice	FO / FM
Ensure supplier statements checked against purchase invoice records	FO
Check any old creditors and ascertain why still unpaid	FM

**Insurance**

Reviewed annually for accuracy	ACM
Index linked	ACM
Provider reviewed every 3-5 years	ACM
Relevant assets added to insurance at time of aquirement	ACM

**General**

Check trial balance monthly	FM
Perform a data check in the Omega Accounts system monthly	FM
Check VAT return and VAT control account match monthly	FM
At least twice each financial year, check actual expenditure against estimates and investigate any overspends	FM
Check regular reporting of expenditure and variances from budget	FM
Monthly checking of all transactions for correct coding	FM
Financial Regulations are prepared in line with best practice & reviewed annually	DTC & RFO
Standing Orders prepared in line with best practice & reviewed annually	TC / DTC & RFO
Regular contracts (eg utility) reviewed periodically to ensure best value for money	DTC & RFO / FM
Code of Conduct adopted for members	DTC & RFO / CE&DSM

**Key:**

ACM = Assets &amp; Contracts Manager

CE&amp;DSM = Community Engagement and Democratic Services Manager

CLLRS = Councillors

DTC&amp;RFO = Deputy Town Clerk and Responsible Finance Officer

FO = Finance Officer

FM = Finance Manager

GP = Golf Professional

HOP = Head of Place

HR&amp;ODM = Human Resources and Operational Development Manager

OFM - Operations and Facilities Manager

SCC = Senior Committee Clerk

TC = Town Clerk



## Seaford Town Council

<b>Report No:</b>	<b>187/25</b>
<b>Agenda Item No:</b>	<b>13</b>
<b>Committee:</b>	<b>Full Council - Extraordinary</b>
<b>Date:</b>	<b>18 March 2026</b>
<b>Title:</b>	<b>Adoption of the Annual Investment Strategy 2026 - 2027</b>
<b>By:</b>	<b>Darryl Keech, Deputy Town Clerk &amp; Responsible Financial Officer (RFO)</b>
<b>Purpose of Report:</b>	<b>To present the Annual Investment Strategy 2026 – 2027 for adoption</b>

<b>Actions</b>
<b>Full Council is recommended:</b>
<ol style="list-style-type: none"><li>1. To consider the Investment Strategy presented within the report and recommended to be adopted for the 2026 – 2027 financial year.</li><li>2. To move to a vote on the motions below.</li></ol>

<b>Recommendations</b>
<b>Full Council is recommended:</b>
<ol style="list-style-type: none"><li>1. To note the contents of the report.</li><li>2. To adopt the Annual Investment Strategy 2026 - 2027 as set out in Appendix A, noting that officers will update this to the new policy format prior to publication.</li></ol>

### 1. Caveat

- 1.1 This report would have routinely progressed through the Finance & General Purposes (F&GP) Committee before being recommended to Full Council for adoption. Officers have recently discovered that this document must be reviewed by Full Council once per financial year (April – March) and due to

Quarter 4's Full Council meeting falling in April, this meeting is the last chance for Full Council to review the document within the correct timescale.

## **2. Information**

- 2.1** The Town Council is required to produce an Annual Investment Strategy and review it each financial year.
- 2.2** The investment strategy ensures that any Town Council investments contribute to the objectives of the Town Council and its functions, through effective treasury management activities and the prudent management of its finances.
- 2.3** The 2026 – 2027 Annual Investment Strategy is attached at **Appendix A**.
- 2.4** The only recommended changes from the previous Strategy are contained in section 4.1 (the estimated balance of the fund for 2026 – 2027) and section 5.3 (which now correctly includes mention of the Town Council's annual grants scheme).
- 2.5** It is a requirement that this strategy is made available to the public and therefore, once approved, a copy will be published on the Town Council's website.
- 2.6** Due to the timelines for the short turnaround of this meeting, the revised policy has been reviewed in its original format. Once approved, it can be transferred into the new format prior to publication.

## **3. Financial Appraisal**

- 3.1** The Town Council has a current account with the Co-Operative Bank and also invests in CCLA's Public Sector Deposit fund, which is an instant access fund.
- 3.2** The CCLA's interest rates have decreased this year with the rate at the end of February 2026 of 3.7705% compared with 4.5376% at the end of February 2025. Despite this reduction, the current rate remains competitive and continues to offer a favourable return compared to similar investment bodies.
- 3.3** The total interest received to 28 February 2026 is £79,620.29 compared with £85,076.71 as at 28 February 2025.
- 3.4** There is currently £1,870,000 (compared to £1,670,000 in February 2025) in the CCLA account and this is expected to remain the same at the end of this financial year.

#### **4. Contact Officer**

- 4.1** The Contact Officer for this report is Darryl Keech, Deputy Town Clerk & Responsible Financial Officer.



## Seaford Town Council

### Annual Investment Strategy 2026 - 2027

<b>Policy Ref.</b>	F9
<b>Date Last Adopted</b>	March 2025
<b>Date of Next Review</b>	March 2026
<b>Possible Prompts for Earlier Review</b>	-
<b>Previous Adoption Dates</b>	March 2024 March 2023 March 2022 March 2021 July 2020 April 2019
<b>Author</b>	Responsible Financial Officer

## Annual Investment Strategy 2026 - 2027

1. The Town Council has had regard to the [Statutory Guidance on Local Government Investments](#) produced by the Ministry of Housing, Communities & Local Government (MHCLG) and CIPFA's Treasury Management in Public Services: Code of Practice and Guidance Notes for Local Authorities.
2. This Annual Investment Strategy states which investments the Town Council may use for prudent management of its treasury balances during the financial year.
3. **Investment Objectives**
  - 3.1 All investments will be in pounds sterling (£).
  - 3.2 The general public policy objective for this Town Council is the prudent investment of its treasury balances.
  - 3.3 The Town Council's investment priorities are the security of reserves and liquidity of its investments.
  - 3.4 The Town Council will aim to achieve the optimum return on its investments commensurate with the proper levels of security and liquidity.
  - 3.5 The MHCLG states that the borrowing solely for the purpose of investment and lending to generate a return is unlawful and this Town Council will not engage in such activity.
4. **Investment Balances/Liquidity of Investments**
  - 4.1 The Town Council has considered the current level of balances and estimated levels over the next three years coupled with the need for liquidity, its spend commitments and provision for contingencies. Investments may be made for longer than one year but only in CCLA's Local Authorities Property Fund (LAPF) and only balances that will not be needed for at least two years.
  - 4.2 In order to maintain sufficient security and liquidity the Town Council will manage any surplus funds mainly through CCLA's Public Sector Deposit Fund, which provide an optimal rate of interest. At the discretion of the Responsible Financial Officer (RFO), in consultation with the Town Clerk, deposits in other UK banks, with a minimum long term Moody's (or

equivalent) credit rating of 'A', may be used if offering a higher rate of interest.

**5. Investments Defined as Capital Expenditure**

- 5.1 The acquisition of share capital or loan capital in any body corporate is defined as capital expenditure under Section 16(2) of the Local Government Act 2003. Such investment will have to be funded out of capital or revenue resources and will be classified as “non specified investments”.
- 5.2 A loan or grant by this Town Council to another body for capital expenditure by that body is also deemed by regulation to be capital expenditure by this Town Council. It is therefore important for this Town Council to clearly identify if the loan has been made for policy reasons or if it is an investment for treasury management purposes. The latter will be governed by the framework set by the Town Council for “specified” and “non-specified” investments.
- 5.3 It is not yet known if the Town Council will incur any investments of a capital expenditure nature, as the outcome of the Town Council’s annual Discretionary Grants Scheme – which allows grant applications for capital purposes – will not be known until applications have been assessed (expected to take place in July 2026). Any grants awarded by the Town Council under this scheme will be made for policy reasons.
- 5.4 Investment in the LAPF is not classed as Capital Expenditure.

**6. Provisions for Credit Related Losses**

- 6.1 If any of the Town Council’s investments appear at risk of loss due to default (i.e. a credit rated loss, and not one resulting from a fall in price due to movements in interest rates), the Town Council will make revenue provision of an appropriate amount.

**7. Investment Strategy to be Followed In House**

- 7.1 To retain not less than three months’ average working capital (revenue) requirement in the current and instant access accounts giving immediate access.
- 7.2 Amounts representing the balance on Capital Receipts Earmarked Reserve at the beginning of the financial year may be placed on deposit of up to one year’s duration depending on the prevailing interest rates.

7.3 Any other funds may be placed on deposit of up to one year's duration, depending on the prevailing interest rates and forecast cash flow requirements.

7.4 Suitably available funds may be placed for more than one year in CCLA's LAPF, depending on cash flow requirements, up to a maximum of £2,000,000. See 4.2.

**8. End of Year Investment Report**

8.1 During the budget process the RFO will report on investment forecasts.

8.2 At the end of the financial year, the RFO will prepare a report on investment activity.

DRAFT



## Seaford Town Council

<b>Report No:</b>	<b>188/25</b>
<b>Agenda Item No:</b>	<b>14</b>
<b>Committee:</b>	<b>Full Council - Extraordinary</b>
<b>Date:</b>	<b>18 March 2026</b>
<b>Title:</b>	<b>Review of the Financial Regulations Policy</b>
<b>By:</b>	<b>Darryl Keech, Deputy Town Clerk &amp; Responsible Financial Officer</b>
<b>Purpose of Report:</b>	<b>To present the review of the Financial Regulations Policy to Full Council for adoption</b>

### **Actions**

#### **Full Council is advised:**

1. To review and discuss the Financial Regulations Policy.
2. To move to a vote on the motions below.

### **Recommendations**

#### **Full Council is recommended:**

1. To note the contents of the report.
2. To adopt the revised Financial Regulations Policy with immediate effect, noting that officers will update this to the new policy format prior to publication.

### **1. Caveat**

- 1.1 This report would have routinely progressed through the Finance & General Purposes (F&GP) Committee before being recommended to Full Council for adoption. Officers have recently discovered that this document must be reviewed by Full Council once per financial year (April – March) and due to Quarter 4's Full Council meeting falling in April, this meeting is the last chance for Full Council to review the document within the correct timescale.

## 2. Introduction

- 2.1 The Financial Regulations Policy was last reviewed and adopted in March 2025, with a date of next review scheduled for March 2026.
- 2.2 The Financial Regulations have been updated and revised using the 5 March 2025 Financial Model produced by the National Association of Local Councils (NALC), which can be viewed on the [NALC website](#).
- 2.3 Due to the timelines for the short turnaround of this meeting, the revised policy has been reviewed in its original format. Once approved, it can be transferred into the new format prior to publication.

## 3. Information

- 3.1 The proposed policy document is presented at **Appendix A**. The current version of the policy is available to view on the [Town Council's website](#) (see the Finance policy section).
- 3.2 The policy updates make a small number of changes to the 2025 version. These include ensuring that the policy aligns with the current staff structure and responsibilities of the posts within this structure.
- 3.3 Significant work has taken place on improvements to the procurement table at Appendix 1 to the policy, which sets out the thresholds for the different values of procurement, the legislative requirements, the Town Council's identified process, and how approval is given.
- 3.4 In addition, and in line the NALC model regulations, the threshold for a guaranteed open tender process is increased from £30,000 to £60,000, which is more suitable for a council with a turnover exceeding £2 million. The table at Appendix 1 of the policy therefore identifies the process for procurement exceeding £30,000 and up to £59,999 (a 'Level 3' procurement), and a separate process for £60,000 and above (Level 4 or 5).
- 3.5 To reflect the greater detail now included in the procurement table, parts of section 5 of the main Financial Regulations policy document have been removed as they have now been incorporated into the table, enabling the table to become a clear reference document for officers to use and refer to when running procurement processes.
- 3.6 There are no other significant changes to the policy.

#### **4. Financial Appraisal**

- 3.1** All financial matters are addressed within the policy that officers will use for all financial matters in 2026 – 2027.

#### **5. Contact Officer**

- 5.1** The Contact Officer for this report is Darryl Keech, Deputy Town Clerk & Responsible Financial Officer.



Seaford Town Council

## Financial Regulations

<b>Policy Ref.</b>	F4	
<b>Date Last Adopted</b>	March 2025	
<b>Date of Next Review</b>	March 2026	
<b>Possible Prompts for Earlier Review</b>	<ul style="list-style-type: none"> <li>• Changes to national Model Financial Regulations</li> <li>• Any changes identified that should not wait until the annual review for formalise</li> </ul>	
<b>Previous Adoption Dates</b>	March 2024 March 2023 March 2022 January 2022 March 2021	February 2019 April 2017 May 2015
<b>Author</b>	Responsible Financial Officer	

**SEAFORD TOWN COUNCIL - FINANCIAL REGULATIONS**

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These Financial Regulations were adopted by the Town Council at its meeting held on 27<sup>th</sup> March 2025.

## **1. General**

- 1.1. These Financial Regulations govern the financial management of the Town Council and may only be amended or varied by resolution of Full Council. They are one of the Town Council's governing documents and shall be observed in conjunction with the Town Council's Standing Orders.
- 1.2. Councillors are expected to follow these regulations and not to entice employees to breach them. Failure to follow these regulations brings the office of councillor into disrepute.
- 1.3. Wilful breach of these regulations by an employee may result in disciplinary proceedings.
- 1.4. In these Financial Regulations:
  - 'Accounts and Audit Regulations' means the regulations issued under Sections 32, 43(2) and 46 of the Local Audit and Accountability Act 2014, or any superseding legislation, and then in force, unless otherwise specified.
  - 'Approve' refers to an online action, allowing an electronic transaction to take place.
  - 'Authorise' and 'authorised' refers to a decision by the Town Council, or a committee or an officer, to allow something to happen.
  - 'Proper practices' means those set out in The Practitioners' Guide
  - The Practitioners' Guide refers to the guide issued by the Joint Panel on Accountability and Governance (JPAG) and published by NALC in England.
  - 'Must' and **bold text** refer to a statutory obligation the Town Council cannot change.
  - 'Shall' refers to a non-statutory instruction by the Town Council to its members and staff.
- 1.5. The Responsible Financial Officer (RFO) holds a statutory office, appointed by the Town Council. The RFO;
  - acts under the policy direction of the Town Council
  - administers the Town Council's financial affairs in accordance with all Acts, Regulations and proper practices
  - determines on behalf of the Town Council its accounting records and control systems
  - ensures the accounting control systems are observed
  - ensures the accounting records are kept up to date
  - seeks economy, efficiency and effectiveness in the use of Town Council resources, and

- produces financial management information as required by the Town Council.

**1.6. Full Council must not delegate any decision regarding:**

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

**1.7. In addition, Full Council shall:**

- determine and regularly review the bank mandate for all Town Council bank accounts, and
- approve bad debt write-offs above the delegated limit of £5,000

## **2. Risk management and internal control**

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

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

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

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

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

- **ensure that risk is appropriately managed**
- **ensure the prompt, accurate recording of financial transactions**
- **prevent and detect inaccuracy or fraud**

- **allow the reconstitution of any lost records**
  - **identify the duties of officers dealing with transactions, and**
  - **ensure division of responsibilities.**
- 2.6. At least once in each quarter, and at each financial year end, a member other than the Mayor shall be appointed to verify bank reconciliations for all accounts produced by the Finance Manager. The member shall sign and date the reconciliations and the original bank statements (or similar document) as evidence of this. This activity, including any exceptions, shall be reported to and noted by the Finance & General Purposes Committee.
- 2.7. Regular back-up copies shall be made of the records on any Town Council computer and stored either online or in a separate location from the computer. The Town Council shall put measures in place to ensure that the ability to access any Town Council computer is not lost if an employee leaves or is incapacitated for any reason.

### **3. Accounts and audit**

- 3.1. All accounting procedures and financial records of the Town Council shall be determined by the RFO in accordance with the Accounts and Audit Regulations.
- 3.2. **The accounting records determined by the RFO must be sufficient to explain the Town Council's transactions and to disclose its financial position with reasonably accuracy at any time. In particular, they must contain:**
- **day-to-day entries of all sums of money received and expended by the Town Council and the matters to which they relate, and**
  - **a record of the assets and liabilities of the Town Council.**
- 3.3. The accounting records shall be designed to facilitate the efficient preparation of the accounting statements in the Annual Governance and Accountability Return.
- 3.4. The RFO shall complete and certify the annual Accounting Statements of the council contained in the Annual Governance and Accountability Return (AGAR) in accordance with proper practices, as soon as practicable after the end of the financial year. Having certified the Accounting Statements, the RFO shall submit them (with any related documents) to the Town Council, within the timescales required by the Accounts and Audit Regulations.
- 3.5. **The Town Council must ensure that there is an adequate and effective system of internal audit of its accounting records and internal control system in accordance with proper practices.**

- 3.6. **Any officer or member of the Town Council must make available such documents and records as the internal or external auditor consider necessary for the purpose of the audit** and shall, as directed by the Town Council, supply the RFO, internal auditor, or external auditor with such information and explanation as the Town Council considers necessary.
- 3.7. The internal auditor shall be appointed by the Town Council and shall carry out their work to evaluate the effectiveness of the Town Council's risk management, control and governance processes in accordance with proper practices specified in the Practitioners' Guide.
- 3.8. The Town Council shall ensure that the internal auditor:
- is competent and independent of the financial operations of the Town Council,
  - reports to the Town Council in writing, or in person, on a regular basis with a minimum of one written report during each financial year,
  - can demonstrate competence, objectivity and independence, free from any actual or perceived conflicts of interest, including those arising from family relationships, and
  - has no involvement in the management or control of the Town Council.
- 3.9. Internal or external auditors may not under any circumstances:
- perform any operational duties for the Town Council,
  - initiate or approve accounting transactions,
  - provide financial, legal or other advice including in relation to any future transactions, or
  - direct the activities of any Town Council employee, except to the extent that such employees have been appropriately assigned to assist the internal auditor.
- 3.10. For the avoidance of doubt, in relation to internal audit the terms 'independent' and 'independence' shall have the same meaning as described in The Practitioners Guide.
- 3.11. The RFO shall make arrangements for the exercise of electors' rights in relation to the accounts, including the opportunity to inspect the accounts, books, and vouchers and display or publish any notices and documents required by the Local Audit and Accountability Act 2014, or any superseding legislation, and the Accounts and Audit Regulations.
- 3.12. The RFO shall, without undue delay, bring to the attention of the Town Council any correspondence or report from internal or external auditors.

#### 4. Budget and precept

- 4.1. **Before setting a precept, the Town Council must calculate its council tax requirement for each financial year by preparing and approving a budget, in accordance with The Local Government Finance Act 1992 or succeeding legislation.**
- 4.2. Budgets for salaries and wages, including employer contributions shall be reviewed at least annually during the budget setting process for the following financial year and a final version shall be evidenced by a schedule signed by the Town Clerk. The RFO will inform committees of any salary implications before they consider their draft budgets.
- 4.3. No later than December each year, the RFO shall prepare a draft budget with detailed estimates of all revenue income and expenditure for the following financial year along with a forecast for the following four financial years taking account of the lifespan of assets and cost implications of repair and replacement.
- 4.4. Unspent budgets for completed projects shall not be carried forward to a subsequent year. Unspent funds for partially completed projects may only be carried forward (by placing them in an earmarked reserve) with the formal approval of the Finance & General Purposes Committee or Full Council.
- 4.5. Each committee shall review its draft budget and submit any proposed amendments to the Finance & General Purposes Committee not later than the end of December each year.
- 4.6. The draft budget with any committee proposals and four-year forecast, including any recommendations for the use or accumulation of reserves, shall be considered by the Finance & General Purposes Committee and a recommendation made to the Town Council.
- 4.7. Having considered the proposed budget and four-year forecast, the Town Council shall determine its council tax requirement by setting a budget. The Town Council shall set a precept for this amount no later than the end of January for the ensuing financial year.
- 4.8. **Any member with council tax debt unpaid for more than two months is prohibited from voting on the budget or precept by Section 106 of the Local Government Finance Act 1992 and must disclose at the start of the meeting that Section 106 applies to them.** This is not automatically an issue with councillors who pay council tax in monthly instalments as they are not in arrears from an expected payment.
- 4.9. The RFO shall **issue the precept to the billing authority no later than the end of February** and supply each member with a copy of the agreed annual budget.

- 4.10. The agreed budget provides a basis for monitoring progress during the year by comparing actual spending and income against what was planned.
- 4.11. Movements in earmarked reserves (EMRs) shall be approved by the RFO and reported to the relevant committee as part of the budgetary control process.

## **5. Procurement**

- 5.1. **Members and officers are responsible for obtaining value for money at all times.** Any officer procuring goods, services or works should ensure, as far as practicable, that the best available terms are obtained, usually by obtaining prices from more than one supplier.
- 5.2. The RFO should verify the lawful nature of any proposed purchase before it is made or as soon as possible after the order is placed by the authorised Department Manager.
- 5.3. Every contract shall comply with the Town Council's Standing Orders and these Financial Regulations and no exceptions shall be made, except in an emergency.
- 5.4. **For a contract for the supply of goods, services or works where the estimated value will exceed the thresholds set by Parliament, the full requirements of The Procurement Act 2023 and The Procurement Regulations 2024 or any superseding legislation ("the Legislation"), must be followed in respect of the tendering, award and notification of that contract.**
- 5.5. **For contracts estimated to be over £30,000 including VAT, the council must comply with any requirements of the Legislation regarding the publication of invitations and notices.**
- 5.6. **Contracts must not be split to avoid compliance with these rules.**
- 5.7. The Town Council shall (with the exception of items listed in paragraph 5.10) obtain prices in accordance with the Procurement Table in Appendix 1.
- 5.8. The requirement to obtain competitive prices in these regulations need not apply to contracts that relate to items (i) to (viii) below:
- i. for the supply of gas, electricity, water, sewerage, and telephone services
  - ii. specialist services, such as legal professionals, accountants, surveyors, insurance, and consultants;
  - iii. repairs to, or parts for, existing machinery or equipment;
  - iv. works, goods or services that constitute an extension of an existing contract;

- v. goods or services that are only available from one supplier or are sold at a fixed price e.g. golf course machinery (purchased and leased);
  - vi. for additional work of the external auditor up to an estimated value of £1,000 (in excess of this sum the Town Clerk and RFO shall act after consultation with the Chair of the Finance & General Purposes Committee);
  - vii. contracts of employment;
  - viii. any contract for the sale or purchase of any right in or over land or premises;
  - ix. concession tender processes, which are governed by the Town Council's Concessions Policy.
- 5.9. When applications are made to waive this financial regulation to enable a price to be negotiated without competition, the reason should be set out in a recommendation to the Town Council. Avoidance of competition is not a valid reason.
- 5.10. The Town Council shall not be obliged to accept the lowest or any tender, quote or estimate.
- 5.11. Expenditure on revenue items up to the amounts included for that class of expenditure in the approved budget is authorised. This authority is to be determined by the Town Council when setting the Annual Budget, subject to the requirements of the Town Council's Standing Orders and Financial Regulations.
- 5.12. No individual member, or informal group of members may issue an official order or make any contract on behalf of the Town Council.
- 5.13. No expenditure may be authorised that will exceed the amount provided in the revenue budget for a Committee Budget other than by resolution of the Town Council, except in an emergency. During the budget year, it is expected that Account Codes will vary to budget and that consequently Cost Centres will also vary. However, the Committee spend must be within budget unless approved otherwise by Full Council. Any deviations due to loss of income does not require approval but should be reported to the relevant committee as soon as practicable. There is no need to undertake virements.
- 5.14. In cases of serious risk to the delivery of Town Council services or to public safety on Town Council premises, the Town Clerk may authorise expenditure of up to £10,000 excluding VAT on repair, replacement or other work that in their judgement is necessary, whether or not there is any budget for such expenditure. The Town Clerk shall report such action to the Mayor of the Town Council as soon as practicable thereafter.

- 5.15. No expenditure shall be authorised, no contract entered into, or tender accepted in relation to any major project, unless the Town Council is satisfied that the necessary funds are available and that where a loan is required, Government borrowing approval has been obtained first.
- 5.16. An official order or letter shall be issued for all work, goods and services unless a formal contract is to be prepared, or an official order would be inappropriate. Copies of orders shall be retained, along with evidence of receipt of goods where necessary.
- 5.17. Any ordering system can be misused and access to them shall be controlled by the RFO and authorised Department Managers.

## **6. Banking and payments**

- 6.1. The Town Council's banking arrangements, including the bank mandate, shall be made by the RFO and authorised by the Town Council; banking arrangements shall not be delegated to a committee. The Town Council has resolved to bank with the Co-operative Bank. The arrangements shall be reviewed at least every five years for security and efficiency.
- 6.2. The Town Council must have safe and efficient arrangements for making payments, to safeguard against the possibility of fraud or error. Wherever possible, more than one person should be involved in any payment, for example by dual online authorisation or dual cheque signing. Even where a purchase has been authorised, the payment must also be authorised and only authorised payments shall be approved or signed to allow the funds to leave the councils bank.
- 6.3. All invoices for payment should be examined for arithmetical accuracy, analysed to the appropriate expenditure heading and verified to confirm that the work, goods or services were received, checked and represent expenditure previously authorised by the council before being certified by the RFO. Where certification of invoices is done as a batch, this shall include a batch header signed by the RFO that the invoices listed have been examined, verified and certified.
- 6.4. Personal payments (including salaries, wages, expenses and any payment made in relation to the termination of employment) may be summarised to avoid disclosing any personal information.
- 6.5. Wherever possible, payments shall be made by online banking, in accordance with a resolution of the Town Council (or duly delegated committee) or a delegated decision by an officer.
- 6.6. A list of regular payments and Direct Debits shall be submitted to the Finance & General Purposes Committee every two years.

- 6.7. The Town Clerk and RFO shall have delegated authority to authorise payments and transfers in the following circumstances:
- i. payments of up to £10,000 excluding VAT in cases of serious risk to the delivery of council services or to public safety on council premises.
  - ii. any payment necessary to avoid a charge under the Late Payment of Commercial Debts (Interest) Act 1998 or to comply with contractual terms, where the due date for payment is before the next scheduled payment run, where the Town Clerk and RFO certify that there is no dispute or other reason to delay payment, provided that a list of such payments shall be submitted to the next appropriate meeting of the Finance & General Purposes Committee.
  - iii. Fund transfers within the councils banking arrangements provided that a list of such transfers shall be submitted to the next appropriate meeting of the Finance & General Purposes Committee.
- 6.8. The Finance Officer shall present a weekly schedule of payments requiring authorisation. These will be reviewed by the RFO or Finance Manager for approval before seeking authorisation from two Members. This authorisation may be given via email or in person.

## **7. Electronic payments**

- 7.1. Where internet banking arrangements are made with any bank, the Town Clerk, RFO and Finance Manager shall be appointed as the Service Administrators. The bank mandate agreed by the Town Council shall identify a number of councillors who will be authorised to approve transactions on those accounts and a minimum of two people will be involved in any online approval process.
- 7.2. No employee or councillor shall disclose any PIN or password, relevant to the Town Council or its banking, to anyone not authorised in writing by the Town Council or a duly delegated committee.
- 7.3. The Finance Officer shall set up all items due for payment online after authorisation from two Members has been given as per 6.8.
- 7.4. Once set up by the Finance Officer, the RFO will check the details and then release the funds. In the prolonged absence of either the Finance Officer or RFO, other authorised persons may be appointed to complete the online payment process by the Town Clerk.
- 7.5. With the approval of the Town Council, regular payments (such as gas, electricity, telephone, broadband, water, National Non-Domestic Rates, refuse collection, pension contributions and HMRC payments) may be made by variable direct debit, provided that the instructions are approved by two

authorised members. The approval of the use of each variable direct debit shall be reviewed by the Town Council at least every two years.

- 7.6. Where entry into a contract requires immediate agreement to payment by Direct Debit in order to secure favourable terms or pricing, the RFO or Finance Manager may enter into such agreement, provided that:
  - (a) the contract value is within the approved budget;
  - (b) the Direct Debit mandate is countersigned or confirmed by two authorised members as soon as reasonably practicable.
- 7.7. If thought appropriate by the council, regular payments of fixed sums may be made by banker's standing order, provided that the instructions are approved by two members, evidence of this is retained and any payments are reported to council when made. The approval of the use of a banker's standing order shall be reviewed by the Town Council at least every two years.
- 7.8. Account details for suppliers may only be changed upon written notification by the supplier verified by the RFO or Finance Manager. This is a potential area for fraud and the individuals involved should ensure that any change is genuine. Data held should be checked with suppliers every two years.
- 7.9. Members and officers shall ensure that any computer used for the council's financial business has adequate security, with anti-virus, anti-spyware and firewall software installed and regularly updated.
- 7.10. Remembered password facilities should not be used on any computer used for council banking.

## **8. Cheque payments**

- 8.1. Cheques or orders for payment in accordance with a resolution or delegated decision shall be signed by two members who are bank signatories and countersigned by the RFO or Finance Manager.
- 8.2. A signatory having a family or business relationship with the beneficiary of a payment shall not, under normal circumstances, be a signatory to that payment.
- 8.3. To indicate agreement of the details on the cheque with the counterfoil and the invoice or similar documentation, the signatories shall also initial the cheque counterfoil and invoice.

## **9. Payment cards**

- 9.1. Any credit, debit or payment card issued for use will be specifically restricted to use in accordance with the Town Council's Purchase Ordering and Payment for Goods Policy.

## **10. Petty Cash**

10.1. The Finance Manager shall hold a petty cash float of £250 and may provide petty cash to officers for the purpose of defraying operational and other expenses.

- a) Vouchers for payments made from petty cash shall be kept, along with receipts to substantiate every payment.
- b) Cash income received must not be paid into the petty cash float but must be separately banked, as provided elsewhere in these regulations.
- c) Payments to maintain the petty cash float shall be shown separately on any schedule of payments presented for approval.

## **11. Payment of salaries and allowances**

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

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

11.3. Salary rates shall be agreed by the Town Council, or a duly delegated committee. No changes shall be made to any employee's gross pay, emoluments, or terms and conditions of employment without the prior consent of the Personnel Committee or Town Council otherwise than in accordance with the Scheme of Delegation.

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

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

11.6. Each payment to employees of net salary and to the appropriate creditor of the statutory and discretionary deductions shall be recorded in a payroll control account or other separate confidential record, with the total of such payments each calendar month reported in the cashbook.

11.7. The confidential pay records are not open to inspection or review (under the Freedom of Information Act 2000 or otherwise) other than:

- a) by any member who can demonstrate a need to know
- b) by the internal or external auditor
- c) by any person authorised under The Audit Commission Act 1998, or any superseding legislation

11.8. Any termination payments shall be supported by a report to the Town Council, setting out a clear business case. Termination payments shall only be authorised by the Town Council other than in accordance with the Scheme of Delegation.

## **12. Loans and investments**

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

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

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

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

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

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

## **13. Income**

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

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

13.3. Any bad debts found to be irrecoverable following all possible action taken, shall be reported by the RFO to Full Council if £5,000 or more, or to the Finance & General Purposes Committee if under £5,000 and where appropriate

shall be written off in the year. The relevant approval shall be shown in the accounting records.

- 13.4. All sums received on behalf of the Town Council shall be deposited intact with the Town Council's bankers, with such frequency as the RFO considers necessary. The origin of each receipt shall clearly be recorded on the paying-in slip or other record.
- 13.5. Personal cheques shall not be cashed out of money held on behalf of the council.
- 13.6. The RFO and Finance Manager shall ensure that VAT is correctly recorded in the council's accounting software and that any VAT Return required is submitted from the software by the due date.
- 13.7. Where sums of cash exceeding £500 are received by the Town Council, the RFO shall ensure that more than one person is present when the cash is counted in the first instance, that there is a reconciliation to some form of control record, and that appropriate care is taken for the security and safety of individuals banking such cash.

#### **14. Payments under contracts for building or other construction works**

- 14.1. Where contracts provide for payment by instalments the RFO shall maintain a record of all such payments, which shall be made within the time specified in the contract based on signed certificates from the architect or other consultant engaged to supervise the works.
- 14.2. Any variation or addition or omission from a contract must be authorised by the Town Clerk to the contractor in writing, with the Town Council being informed where the final cost is likely to exceed contract sum by 5% or more or likely to exceed the budget available.

#### **15. Stores and equipment**

- 15.1. The officer in charge of each section shall be responsible for the care and custody of stores and equipment in that section.
- 15.2. Delivery notes shall be obtained in respect of all goods received into store or otherwise delivered and goods must be checked as to order and quality at the time delivery is made.
- 15.3. Stocks shall be kept at the minimum levels consistent with operational requirements.
- 15.4. The RFO shall be responsible for periodic checks of stocks and stores, at least annually.

## **16. Assets, properties and estates**

- 16.1. The Town Clerk and Assets and Contracts Manager shall make arrangements for the safe custody of all title deeds and Land Registry Certificates of properties held by the Town Council.
- 16.2. The Assets and Contracts Manager and RFO shall ensure that an appropriate and accurate Register of Assets and Investments is kept up to date, with a record of all properties held by the Town Council, their location, extent, plan, reference, purchase details, nature of the interest, tenancies granted, rents payable and purpose for which held, in accordance with Accounts and Audit Regulations.
- 16.3. The continued existence of tangible assets shown in the Register shall be verified at least annually, possibly in conjunction with a health and safety inspection of assets.
- 16.4. No interest in land shall be purchased or otherwise acquired, sold, leased or otherwise disposed of without the authority of the Town Council, together with any other consents required by law. In each case a written report shall be provided to Town Council in respect of valuation and surveyed condition of the property (including matters such as planning permissions and covenants) together with a proper business case (including an adequate level of consultation with the electorate where required by law).
- 16.5. No tangible moveable property shall be purchased or otherwise acquired, sold, leased or otherwise disposed of, without the authority of the Town Council, together with any other consents required by law, except where the estimated value of any one item does not exceed £5,000.

## **17. Insurance**

- 17.1. The Assets and Contracts Manager shall keep a record of all insurances effected by the council and the property and risks covered, reviewing these annually before the renewal date in conjunction with the Town Council's review of risk management.
- 17.2. The Town Clerk and Section Managers shall give prompt notification to the Assets and Contracts Manager of all new risks, properties or vehicles which require to be insured and of any alterations affecting existing insurances.
- 17.3. The Assets and Contracts Manager shall be notified of any loss, liability, damage or event likely to lead to a claim, and shall report these to the Town Council at the next available meeting. The Assets and Contract Manager and RFO shall negotiate all claims on the council's insurers.

17.4. All appropriate members and employees of the Town Council shall be included in a suitable form of security or fidelity guarantee insurance which shall cover the maximum risk exposure as determined by the Town Council.

## **18. Suspension and revision of Financial Regulations**

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

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

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

## **19. Earmarked Reserves (EMR)**

19.1. Reserves will only be earmarked in line with the CIPFA Code of Practice on Local Authority Accounting in the UK (the Statement of Recommended Practice). The amount earmarked in any one financial year will not exceed the difference (surplus) between the budgeted net expenditure and the actual net expenditure. All capital receipts will go into a Capital Receipts EMR, which can only be used for capital expenditure.

19.2. Reserves can be spent or Earmarked at the discretion of the Town Council. They can result from:

- (i) events which have allowed monies to be set aside,
- (ii) surpluses,
- (iii) decisions causing anticipated expenditure to have been postponed or cancelled,
- (iv) monies set aside for major anticipated capital schemes, projects or service arrangements the Town Council may wish to carry out.

19.3. Expenditure will not be charged direct to Earmarked Reserves and transfers to and from Earmarked Reserves will be distinguished from service expenditure in the Statement of Accounts.

19.4. For each reserve established, the following will be clearly documented:

- a. The reason for or the purpose of the Earmarked Reserve will be clearly defined within the above guidelines.

- b. The types of expenditure the Earmarked Reserve will be used for and the basis of transactions will be clearly defined.
- c. Any circumstances for which the reserves cannot be used.

19.5. Reserves will be managed, controlled and reviewed by the RFO;

- a. On a transaction by transaction basis to ensure that the correct expenditure is being taken from the correct reserve and that no reserve is overspent.
- b. Twice per year, once during the budget review procedure and once at the year-end. The RFO, in consultation with the Town Clerk, will review the appropriateness of each reserve, making recommendations to Full Council as to which reserves should be earmarked in the next financial year. At such time, any reserves considered no longer appropriate will be transferred back to the General Reserve.
- c. During the year end closedown procedures, when all income and expenditure is known, and having consulted with the Chair of the Finance & General Purposes Committee, the RFO will earmark any underspends on any appropriate budget as long as there are sufficient underspends in the overall Town Council budget. Any such decisions will be communicated promptly to the Finance & General Purposes Committee. Expenditure from these reserves must be approved by the RFO, in consultation with the Town Clerk. Any use of these Reserves will be reported to the next Finance & General Purposes Committee.

## **20. Concessions**

20.1. The Town Council has an adopted Concessions Policy that governs the concessions tendering process. Whilst not a procurement process, the concessions tendering process is designed to align with the principles set out within procurement legislation, ensuring a fair, transparent and robust process. Concessions contracts over the value of £5,336,937 are subject to the Procurement Act 2023.

## **Appendix 1 - Tender Process and Procurement Table**

- 1) Any invitation to tender shall state the general nature of the intended contract and the Town Clerk shall obtain the necessary technical assistance to prepare a specification in appropriate cases.
- 2) Electronic tendering processes will be used by the Town Council.
- 3) Any invitation to tender issued under this regulation shall be subject to the Town Council's adopted Standing Orders and shall refer to the terms of the Bribery Act 2010.
- 4) Where the Town Council, or duly delegated committee, does not accept any tender, quote or estimate, the work is not allocated and the Town Council requires further pricing, no person shall be permitted to submit a later tender, estimate or quote who was present when the original decision-making process was being undertaken.
- 5) Where the estimated costs of works, goods, services or materials are as set out in the procurement table below, after the required budget provision has been agreed, the arrangements for the invitation of tenders or quotes as appropriate and the subsequent acceptance thereof shall be as shown in the table below.
- 6) When estimating contract values, the Town Council must include: the full term of the contract, any potential extension periods, all renewal options, and the total cost including VAT.
- 7) Providing a genuine estimate has been reached prior to launching the procurement process, if the quotes come in higher than expected and cross another threshold within the table below, the process need not be restarted.

**Procurement Table**

**Bold text** = legislative requirement of Procurement Act 2023 (PA23)

Normal text = Town Council process

Value (incl. VAT)	Classification Under PA23	<b>PA23 Requirements</b>	STC Ref.	STC Identified Process	Approval
Up to £3,599	Below-threshold	<b>Adhere to PA23 principles*</b>	Level 1	<p>Officers to seek quotes, ensuring value for money in accordance with FR 5.1</p> <p>When approving, budget holder to satisfy self that value for money has been obtained and PA23 principles adhered to</p> <p>Any conflicts of interest are monitored by lead officer and immediately declared to line manager / budget holder, who will assess and, if required, arrange for an alternative lead officer. Records will be maintained of the above</p>	Budget holder (Town Clerk or RFO must countersign spend over £2,000)
£3,600 to £29,999	Below-threshold	<b>Adhere to PA23 principles*</b>	Level 2	<p>Minimum three quotes obtained, where possible</p> <p>Quotes evaluated by lead officer who will recommend preferred contractor to Town Clerk or RFO for approval</p> <p>When approving, Town Clerk or RFO to satisfy self that value for money has been obtained and PA23 principles adhered to</p>	Town Clerk or RFO

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Value (incl. VAT)	Classification Under PA23	PA23 Requirements	STC Ref.	STC Identified Process	Approval
				Any conflicts of interest are monitored by lead officer and immediately declared to line manager / budget holder, who will assess and, if required, arrange for an alternative lead officer. If the Town Clerk or RFO identifies a conflict of interest themselves, they will share this with the other, who can substitute if required. Records will be maintained of the above	
£30,000 to £59,999	Below-threshold BUT notifiable	<p><b>Adhere to PA23 principles*</b></p> <p><b>Contract award notice must be advertised</b></p> <p>Recommended that, for both open and closed processes, proper tender documentation is used to ensure a fair and</p>	Level 3	<p>The Town Council allows flexibility for officers (the Town Clerk and RFO) to determine whether procurement at this value is run as an open or closed tender before the process is run</p> <p><u>Roles:</u> Lead officer to be identified to deliver the procurement process</p> <p>The Town Clerk or RFO or Head of Place to be identified as process moderator</p> <p><u>Tender Documents:</u> (For both open and closed) Quotation form and evaluation documents and criteria to be scrutinised by the moderator prior to advertising</p>	Town Clerk and RFO – Head of Place to substitute in absence of either

Value (incl. VAT)	Classification Under PA23	<b>PA23 Requirements</b>	STC Ref.	STC Identified Process	Approval
		competitive process and compliant bids		<p>The tender documents will include, as a minimum, the following steps:</p> <ul style="list-style-type: none"> <li>• a specification for the goods, materials, services or the execution of works</li> <li>• an invitation to tender, to confirm:               <ol style="list-style-type: none"> <li>a) the Town Council's specification,</li> <li>b) the time, date and address for the submission of tenders,</li> <li>c) the date of the Town Council's written response to the tender, and</li> <li>d) the prohibition on prospective contractors contacting councillors or staff to encourage or support their tender outside the prescribed process</li> </ol> </li> <li>• any invitation to tender shall refer to the terms of the Bribery Act 2010</li> </ul> <p style="text-align: center;"><u>Open Tenders:</u></p> <p><u>Advertising</u> - Advertise on Find a Tender (first), then Contracts Finder and the Town Council website</p>	

Value (incl. VAT)	Classification Under PA23	PA23 Requirements	STC Ref.	STC Identified Process	Approval
				<p><u>Submissions</u> - Bids will be made via the quotation form and submitted via email to the dedicated, limited access email address</p> <p><u>Opening</u> – Bids will be opened and recorded by the Town Clerk or RFO, with one other manager or the lead officer present</p> <p><u>Assessment</u> – The Town Clerk or RFO will forward all tenders to the department manager or lead officer for evaluating</p> <p>The bids will be assessed against set criteria and a preferred bidder identified</p> <p>Details of the evaluation and preferred bidder will be sent to the Town Clerk and RFO (or Head of Place if substituting), who come together to agree the preferred bidder</p> <p style="text-align: center;"><u>Closed Tenders:</u></p> <p><u>Seeking Quotes</u> - Existing list of approved suppliers approached to bid using the tender documents – aim for a minimum of three, where possible</p>	

Value (incl. VAT)	Classification Under PA23	PA23 Requirements	STC Ref.	STC Identified Process	Approval
				<p>In absence of list of approved suppliers relevant to contract, officers to carry out a desktop pre-qualification exercise of suppliers to create a shortlist of suppliers for the specific procurement exercise – aim a minimum of three, where possible</p> <p>Where three suppliers cannot be identified, the moderator is advised and reasons documented</p> <p><u>Submission</u> - Bids will be made via the quotation form published and submitted by email to the lead officer</p> <p><u>Opening</u> – Upon receipt of a bid, the lead officer will open the quote and log the details</p> <p><u>Tender Assessment</u> - The bids will be assessed by the lead officer against set criteria and a preferred bidder identified</p> <p>Details of the evaluation and preferred bidder will be sent to the Town Clerk and RFO (or Head of Place if</p>	

Value (incl. VAT)	Classification Under PA23	PA23 Requirements	STC Ref.	STC Identified Process	Approval
				<p>substituting), who come together to agree the preferred bidder</p> <p style="text-align: center;"><u>Both Open and Closed:</u></p> <p><b><u>Contract Award:</u></b>  <b>A Contract Award Notice is issued on Contracts Finder within 90 days of the contract being signed</b></p> <p><u>Conflicts of Interest:</u>  A two stage, documented conflict of interest process is undertaken by all involved in the process – with any conflicts assessed before advertising and again once bidders are known. Where a conflict is identified, the Town Clerk or RFO will assess this and, where required, arrange for a substitute in the process</p> <p><u>Timescales:</u>  Officers may identify and set the procurement timescales</p>	
£60,000 and over (up to values below)	Below-threshold BUT notifiable	<p><b>Adhere to PA23 principles*</b></p> <p><b>Contract award notice</b></p>	Level 4	<p>The Town Council will run an open tender process for all contracts over £60,000 (including VAT)</p> <p><u>Roles:</u></p>	Town Clerk or RFO to give approval based on the recommendation

Value (incl. VAT)	Classification Under PA23	<b>PA23 Requirements</b>	STC Ref.	STC Identified Process	Approval
		<p><b>must be advertised</b></p> <p>Recommended that, for both open and closed processes, proper tender documentation is used to ensure a fair and competitive process and compliant bids</p>		<p>The Town Clerk or RFO (or Head of Place) to be identified as process moderator</p> <p>At least one, and preferably two members of the Town Council identified via email to support the process</p> <p>The evaluation panel will be identified – ideally consisting of one member of the Strategic Management Team (who is not the moderator), the relevant operational manager and the above one or two members of the Town Council</p> <p><u>Tender Documents:</u> Tender and evaluation documents and criteria to be scrutinised by the moderator prior to advertising</p> <p>The tender documents will include, as a minimum, the following steps:</p> <ul style="list-style-type: none"> <li>• a specification for the goods, materials, services or the execution of works</li> <li>• an invitation to tender, to confirm:               <ol style="list-style-type: none"> <li>a) the Town Council's specification,</li> <li>b) the time, date and address for the submission of tenders,</li> </ol> </li> </ul>	<p>of the evaluation panel</p>

Value (incl. VAT)	Classification Under PA23	PA23 Requirements	STC Ref.	STC Identified Process	Approval
				<p>c) the date of the Town Council's written response to the tender, and</p> <p>d) the prohibition on prospective contractors contacting councillors or staff to encourage or support their tender outside the prescribed process</p> <ul style="list-style-type: none"> <li>• any invitation to tender shall refer to the terms of the Bribery Act 2010</li> </ul> <p><u>Tender Advertising:</u> Advertise on Find a Tender (first), then Contracts Finder and the Town Council website</p> <p><u>Tender Submissions:</u> Bids will be made via the tender documents published and submitted by email to the dedicated, limited access email address</p> <p><u>Tender Opening:</u> Bids will be opened and recorded by the moderator, with one other manager or the lead officer present and one member of the Town Council</p>	

Value (incl. VAT)	Classification Under PA23	PA23 Requirements	STC Ref.	STC Identified Process	Approval
				<p><u>Tender Assessment:</u> The moderator will forward all tenders to the evaluation panel for evaluating</p> <p>The bids will be assessed against set criteria individually by each panel member</p> <p>The panel will come together to discuss and agree joint scores, identifying the preferred bidder</p> <p>The Town Clerk or RFO will approve the spend based upon the recommendation of the evaluation panel.</p> <p><b><u>Contract Award:</u></b> <b>A Contract Award Notice is issued on Contracts Finder within 90 days of the contract being signed</b></p> <p><u>Conflicts of Interest:</u> A two stage, documented conflict of interest process is undertaken by all involved in the process – with any conflicts assessed before advertising and again once bidders are known. Where a conflict is identified, the Town Clerk or RFO will assess this and, where required, arrange for a substitute in the process</p>	

Value (incl. VAT)	Classification Under PA23	PA23 Requirements	STC Ref.	STC Identified Process	Approval
				<p><u>Timescales:</u> Officers may identify and set the procurement timescales</p>	
In excess of £207,720 (including VAT) for goods and services or £5,193,000 (including VAT) for a public works/construction contract	Above-threshold	<b>Full compliance with the PA23 procedural requirements</b>	Level 5	<p><b>A public contract regulated by the Procurement Act 2025 with an estimated value in excess of £207,720 for a goods or services contract or in excess of £5,193,000 for a public works/construction contract shall comply with the relevant procurement procedures and other requirements in the Procurement Act 2025</b></p> <p><b>A public contract in connection with the supply of gas, heat, electricity, drinking water, transport services, or postal services to the public; or the provision of a port or airport; or the exploration for or extraction of gas, oil or solid fuel with an estimated value in excess of £429,809 for a supply, services or design contract; or in excess of £5,336,937 for a works contract</b></p> <p><b>The value of these contracts is calculated over the whole lifetime of the contract inclusive of VAT</b></p>	All tenders over £207,720 can only be accepted by Full Council

Value (incl. VAT)	Classification Under PA23	PA23 Requirements	STC Ref.	STC Identified Process	Approval
				<p>Officers will investigate the legislative requirements and best practice recommended in the preparatory stages of an above threshold procurement process, in order to ensure compliance with regards to timescales, documentation, advertising and contract award</p> <p>The process will likely be as per contracts over £60,000, with the following amendments:</p> <p><b><u>Contract Award:</u></b>  <b>A standstill period of a minimum of eight working days must be observed after the contract has been awarded but before the contract can be signed. The standstill period is initiated by sending a standstill notice to all tenderers, which will include the award criteria, scores of the winning and receiving bidder, and relative advantages of the winning tender. Legal proceedings initiated during this period trigger an automatic suspension, preventing contract signature until resolved. Failing to observe this period can</b></p>	

Value (incl. VAT)	Classification Under PA23	PA23 Requirements	STC Ref.	STC Identified Process	Approval
				<p><b>lead to the contract being declared ineffective</b></p> <p><b><u>Timescales:</u></b> The procurement process will adhere to the timescales set out within the PA23</p> <p><b><u>Documentation:</u></b> The procurement documentation will adhere to the extensive requirements of the PA23</p>	

\* PA23 Principles:

- Delivering value for money
- Maximising public benefit
- Acting with integrity
- Sharing information
- Treating suppliers equally
- Reducing barriers for small & medium size enterprises (SMEs) to participate