

To: Earley Town Council

From: Mayor of Earley

Subject: Mayoral Visits

Date: 18th July, 2022

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The last two months have been quite busy with Mayoral visits. I have represented Earley Town council at the following events: -

- I was asked to participate in the assembly at Aldryngton school. It was inspirational to see all the children looking lively and well and how enthusiastically they engaged in asking questions.
- I was also asked to open Hawkedon schools sports day. Even from my short time at the school, it was evident how happy the children were and how committed the staff are to the school. The sports day was very well attended by parents and very well organised.
- I also went to the launch of Torch. It was very good to hear about the valuable work that you are doing in the local communities. I was particularly impressed with how they merged three existing help hubs into one overall group.
- I was also invited to the Promise Inclusion (they are associated with MENCAP) AGM at Wokingham Town Hall. The endorsements made evident that they are clearly making a difference in people's lives. The Mayor of Wokingham, Councillor Caroline Smith, also attended as did several other councillors and local Mayors.
- I was also invited to the Aisha mosque open day. It was a very well-attended and organised event with a number of Earley Town councillors in attendance. It was particularly good to see so many families there.
- All Pakistani Women's Association (APWA) also invited me to the launch of their association in Greater Reading. APWA work to empower Pakistani women in the UK to engage with their local communities through various events they organise.
- Pakistani Achievement Award had a launch event in Reading at the Pakistani Community Centre. This is their 12th annual event. They have grown from a local London group to a UK-wide event that will be held at Wembley in August.
- There is a group of Asian families (20 in all) who have a group called Halqa Habab (Circle of Friends) based loosely on the principles of the Lions club. They carry out a number of social and charitable events. I was invited to one of their dinners to talk about the Earley Town council and what we do.

Cllr. Tahir Maher
Mayor of Earley

Wokingham Waterside Centre (WWC)

June 2022

Although the Covid pandemic hit many businesses badly WWC was very fortunate that, with dedicated hard work from our management company, Cloud 9 and their team, there was a large increase in numbers of users of the Centre over the last 2 years with a consequent and welcome improvement in the bank account.

Unfortunately, at the same time, with the building of the park and ride (P&R) next door and Wokingham Borough Council (WBC) Highways Department's continued refusal to effectively screen WWC's campsite from it, usage of the camp site has been much reduced as it became a safeguarding issue for youngsters. Consequently much of that part of the business has been lost.

Despite being completed last year the P&R was unable to operate initially as a bus contract could not be agreed by WBC and Thames Valley Business Park (TVBP). However, whilst Winnersh P&R has had a 2nd floor added its business has moved temporarily to the TVBP, but it was recently announced that this service will close shortly. Presumably it will remain as a chargeable car park for users of the 'Local Green Space' by the Thames. There is also a suggestion it could be used as P&R for hospital staff. During the time the P&R has been open litter does not appear to have been removed from site, extra planting and pruning of the 'hedging' has not been done and dead trees have not been replaced. Also, Bat numbers have reduced due to the nighttime lighting. It was drawn to WBC's attention that lighting was overly bright and, although it was reduced, Bat numbers still appear to be low.

WBC Councillor Shirley Boyt joined the board of trustees last year in her own right as a resident of Earley Whitegates ward and was able to inform trustees that WBC had made a commitment to fitting solar panels to all their buildings. Following a meeting she arranged with relevant WBC officers WWC was assured that, not only would WBC fit solar panels (provided nearby trees were pruned to allow sufficient light to the roof) but that they would also arrange to change all the lighting to run so cheaply that WWC would be as close to carbon neutral as possible. The new lighting was fitted almost straight away and it is hoped that the solar panels won't be far behind as the trees have been pruned as requested.

WWC opened in 2000 and the trustees were keenly aware that, 22 years later the floor covering in the changing rooms and showers needed replacing along with some of the showers and carpeting in the rest of the centre. This was completed in March of this year and plans are in place to update other areas of the building later in the year along with the purchase of more canoeing equipment. The centre has also taken on a new cleaning company who are doing a good job.

Following this year's May elections and the political changes at WBC Cllr Boyt became the WBC representative at the Centre. This should lead to closer working with the Council but also means that WWC will be looking for a replacement trustee??

I understand that a few members of ETC have visited the Wokingham Waterside Centre by the Thames in Earley Whitegates. If anyone else is interested I would be happy to arrange it.

Jenny Lissaman

REPORT ON THE AGM OF THE EARLEY COMMUNITY MINIBUS HELD ON TUESDAY 28TH JUNE

This is an independently registered charity that operates a single 14 seater minibus for the benefit of the local community. The personnel are all unpaid volunteers. They offer cheap door to door travel for mainly elderly or disabled groups that are unable to use regular methods of transport.

After the difficulties of the past two years Earley Bus slowly began operations in October 2021. Although not up to pre-covid levels yet, there has been a gradual increase in hirings over the winter. Regular hirers are returning but there is a need for advertising.

As income from hires were depleted and office rent, Bus Insurance, Telephone and First Aid courses remained the same, there was a small deficit in the accounts of £436.

The Committee is investigating buying a new minibus the money for which is already earmarked.

A D1 licence is required for drivers of the minibus and the number of volunteers holding this driving qualification is diminishing. The committee is looking for ways to publicise its need for more volunteers.

Rosemary Cook

29 June 2022

EARLEY TOWN COUNCIL
FINANCIAL REGULATIONS 2020

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These Financial Regulations were adopted by the Council at its meeting held on 29th July 2020.

1. General

1.1. These financial regulations govern the conduct of financial management by the Council and may only be amended or varied by resolution of the Council. Financial regulations must be observed in conjunction with the Council's standing orders and any individual financial regulations relating to contracts.

1.2. The Council is responsible in law for ensuring that its financial management is adequate and effective and that the Council has a sound system of internal control which facilitates the effective exercise of the Council's functions, including arrangements for the management of risk.

1.3. The Council's accounting control systems must include measures:

- for the timely production of accounts;
- that provide for the safe and efficient safeguarding of public money;
- to prevent and detect inaccuracy and fraud; and
- identifying the duties of officers.

1.4. These financial regulations demonstrate how the Council meets these responsibilities and requirements.

1.5. At least once a year, prior to approving the Annual Governance Statement, the Council must review the effectiveness of its system of internal control which shall be in accordance with proper practices.

1.6. Deliberate or wilful breach of these Regulations by an employee may give rise to disciplinary proceedings.

1.7. Members of Council are expected to follow the instructions within these Regulations and not to entice employees to breach them. Failure to follow instructions within these Regulations brings the office of councillor into disrepute.

1.8. The Responsible Financial Officer (RFO) holds a statutory office to be appointed by the Council. The Town Clerk has been appointed as RFO for this council and these regulations will apply accordingly.

1.9. The RFO:

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

1.10. The accounting records determined by the RFO shall be sufficient to show and explain the Council's transactions and to enable the RFO to ensure that any income and expenditure account and statement of balances, or record of receipts and payments and additional information, as the case may be, or management information prepared for the Council from time to time comply with the Accounts and Audit Regulations.

1.11. The accounting records determined by the RFO shall in particular contain:

- entries from day to day of all sums of money received and expended by the Council and the matters to which the income and expenditure or receipts and payments account relate;
- a record of the assets and liabilities of the Council; and
- wherever relevant, a record of the Council's income and expenditure in relation to claims made, or to be made, for any contribution, grant or subsidy.

1.12. The accounting control systems determined by the RFO shall include:

- procedures to ensure that the financial transactions of the Council are recorded as soon as reasonably practicable and as accurately and reasonably as possible;
- procedures to enable the prevention and detection of inaccuracies and fraud and the ability to reconstruct any lost records;
- identification of the duties of officers dealing with financial transactions and division of responsibilities of those officers in relation to significant transactions;
- procedures to ensure that uncollectable amounts, including any bad debts are not submitted to the Council for approval to be written off except with the approval of the RFO and that the approvals are shown in the accounting records; and
- measures to ensure that risk is properly managed.

1.13. The Council is not empowered by these Regulations or otherwise to delegate certain specified decisions. In particular any decision regarding:

- setting the final budget or the precept (council tax requirement);
- approving accounting statements;
- approving an annual governance statement;
- borrowing;
- writing off bad debts;
- declaring eligibility for the General Power of Competence; and
- the Annual Return process in respect of the internal and external auditors' opinions.

1.14. In addition, the Council must:

- determine and keep under regular review the bank mandate for all council bank accounts;
- in respect of the annual salary for any employee have regard to recommendations about annual salaries of employees made by the relevant committee in accordance with its terms of reference.

1.15. In these financial regulations, references to the Accounts and Audit Regulations or 'the regulations' shall mean the regulations issued under the provisions of section 27 of the Audit Commission Act 1998, or any superseding legislation, and then in force unless otherwise specified.

In these financial regulations the term 'proper practice' or 'proper practices' shall refer to guidance issued in *Governance and Accountability for Local Councils - a Practitioners' Guide (England)* issued by the Joint Practitioners Advisory Group (JPAG), available from the websites of NALC and the Society for Local Council Clerks (SLCC).

2. Accounting and audit (internal and external)

2.1. All accounting procedures and financial records of the Council shall be determined by the RFO in accordance with the Accounts and Audit Regulations, appropriate guidance and proper practices.

2.2. On a regular basis, at least once in each quarter, and at each financial year end, bank reconciliations (for all accounts) shall be presented to the chairman at a Policy & Resources Committee meeting. The member shall sign the reconciliations and the original bank statements (or similar document) as evidence of verification. This activity shall on conclusion be reported, including any exceptions, in the Committee minutes subsequently received by Council.

2.3. The RFO shall complete the annual statement of accounts, annual report, and any related documents of the Council contained in the Annual Return (as specified in proper practices) as soon as practicable after the end of the financial year and having certified the accounts shall submit them and report thereon to the Council within the timescales set by the Accounts and Audit Regulations.

2.4. The Council shall ensure that there is an adequate and effective system of internal audit of its accounting records, and of its system of internal control in accordance with proper practices. Any officer or member of the council shall, if the RFO or internal auditor requires, make available such documents and records as appear to the Council to be necessary for the purpose of the audit and shall, as directed by the Council, supply the RFO, internal auditor, or external auditor with such information and explanation as the Council considers necessary for that purpose.

2.5. The internal auditor shall be appointed by and shall carry out the work in relation to internal controls required by the Council in accordance with proper practices.

2.6. The internal auditor shall:

- be competent and independent of the financial operations of the Council;
- report to the Council in writing, or in person, on a regular basis with a minimum of one annual written report during each financial year;
- demonstrate competence, objectivity and independence, be free from any actual or perceived conflicts of interest, including those arising from family relationships; and
- have no involvement in the financial decision making, management or control of the Council

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

- perform any operational duties for the Council;
- initiate or approve accounting transactions; or
- direct the activities of any council employee, except to the extent that such employees have been appropriately assigned to assist the internal auditor.

2.8. For the avoidance of doubt, in relation to internal audit the terms 'independent' and 'independence' shall have the same meaning as is described in proper practices.

2.9. 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 statements of account required by Audit Commission Act 1998, or any superseding legislation, and the Accounts and Audit Regulations.

2.10. The RFO shall, without undue delay, bring to the attention of the Policy & Resources Committee and/or the Council any correspondence or report from internal or external auditors.

3. Annual estimates (budget) and forward planning

3.1. Each committee shall formulate and submit to the Policy & Resources Committee a programme of income and expenditure for the following financial year not later than 30th November each year including any proposals for revising the forecast.

3.2. The RFO must prepare detailed estimates of all receipts and payments including the use of reserves and all sources of funding for the following financial year in the form of a budget to be considered by the Budget Working Party, to then be referred to the Policy & Resources Committee and subsequently approved by Council no later than 28th February each year.

3.3. The Policy & Resources Committee shall consider the use of reserves and all sources of funding and the aggregate effect of these programmes and estimates upon the Council's financial resources and shall submit them to the Council for approval with a recommendation of the precept to be levied for the ensuing financial year. The RFO shall issue the precept to the billing authority and shall supply each Member with a copy of the approved annual budget.

3.4. The approved annual budget shall form the basis of financial control for the ensuing year.

3.5. The Council shall consider the need for and shall have regard to a three year forecast of revenue and capital receipts and payments, including recommendations for the use of reserves and sources of funding and operational impact, and update such forecast accordingly.

3.6 Contingencies:

- provision for salary and wages pay awards – there shall be included in the budget such provision for salary and wages as may be considered necessary
- provision for inflation – there shall be included in the estimates a provision for inflation based on the best information available at the time

4. Budgetary control and authority to spend

4.1. Expenditure on revenue items may be authorised up to the amounts included for that class of expenditure in the approved budget.

Contracts may not be disaggregated to avoid controls imposed by these regulations.

4.2. No expenditure may be authorised that will exceed the amount provided in the revenue budget for that class of expenditure other than by resolution of the Council, or duly delegated committee. During the budget year and with the approval of Council having considered fully the implications for public services, unspent and available amounts may be moved to other budget headings or to an earmarked reserve as appropriate ('virement').

4.3. Unspent provisions in the revenue or capital budgets for completed projects shall not be carried forward to a subsequent year unless placed in an earmarked reserve by resolution of the Policy & Resources Committee.

4.4. The salary budgets are to be reviewed at least annually in October for the following financial year and such review shall be evidenced by a hard copy schedule signed by the Clerk and the Chairman of Council or relevant committee. The RFO will inform committees of any changes impacting on their budget requirement for the coming year in good time.

4.5. In cases of extreme risk to the delivery of council services, the Town Clerk may authorise revenue expenditure on behalf of the council which in the clerk's judgement it is necessary to carry out. Such expenditure includes repair, replacement or other work, whether or not there is any budgetary provision for the expenditure. This is subject to a limit of £20,000, following consultation with the Leader of the Council and the Town Mayor. The Town Clerk shall report such action to the Council as soon as practicable thereafter.

4.6. No expenditure shall be authorised in relation to any capital project and no contract entered into or tender accepted involving capital expenditure unless the Council is satisfied that the necessary funds are available and the requisite borrowing approval has been obtained.

4.7. All capital works shall be administered in accordance with the Council's standing orders and financial regulations relating to contracts.

4.8. The RFO shall regularly provide the budget holding committees and the Council with a statement of receipts and payments to date under each head of the budgets, comparing actual expenditure to the appropriate date against that planned as shown in the budget. These statements are to be prepared at least at the end of each financial quarter. Commentary on income and expenditure shall be provided and Members' attention drawn to material variances in excess of 25% of the budget.

4.9. Changes in earmarked reserves shall be recommended by the Policy & Resources Committee for approval by Council as part of the budgetary control process.

5. Banking arrangements and authorisation of payments

5.1. The Council's banking arrangements, including the bank mandate, shall be made by the RFO and approved by the Council; banking arrangements may not be delegated to a committee. They shall be regularly reviewed for safety and efficiency.

5.2. The Council will operate such bank or other accounts as it considers necessary and appropriate for the efficient conduct of its business.

5.3. The Finance Officer shall prepare a schedule of payments requiring authorisation. The Town Clerk and either the Deputy Town Clerk or Facilities Manager, along with two authorised signatories shall review the schedule for compliance and, having satisfied themselves shall authorise payment. The approved schedule shall be disclosed within or as an attachment to the agenda of the following Policy & Resources Committee or Full Council meeting.

5.4. All invoices for payment shall be examined, verified and certified by the Town Clerk and either the Deputy Town Clerk or Facilities Manager to confirm that the work, goods or services to which each invoice relates has been received, carried out, examined and represents expenditure previously approved by the council.

5.5. The Finance Officer shall examine invoices for arithmetical accuracy. The Finance Officer shall take all steps to settle all invoices submitted within 30 days.

5.6. The RFO shall have delegated authority to authorise the payment of items in the following circumstances:

5.6.1. If a payment is necessary to avoid a charge to interest under the Late Payment of Commercial Debts (Interest) Act 1998, and the due date for payment is before the next scheduled Meeting of council, where the 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 Council or Policy & Resources Committee;

5.6.2. An expenditure item authorised under continuing contracts and obligations provided that a list of such payments shall be submitted to the next appropriate meeting of Council or Policy & Resources Committee; or

5.6.3. Fund transfers within the councils banking arrangements up to the sum of £10,000, provided that a list of such payments shall be submitted to the next appropriate meeting of Council or Policy & Resources Committee.

5.7. In respect of grants a duly authorised committee shall approve expenditure within any limits set by Council and in accordance with any policy statement approved by council.

5.8. Members are subject to the Code of Conduct that has been adopted by the Council and shall comply with the Code and Standing Orders when a decision to authorise or instruct payment is made in respect of a matter in which they have a disclosable pecuniary or other interest, unless a dispensation has been granted.

5.9. The council will aim to rotate the duties of members in these Regulations so that onerous duties are shared out as evenly as possible over time.

5.10. Bank reconciliations for all operating bank accounts shall be prepared by the Finance Officer as soon as practicable after the end of each month.

6. Instructions for the making of payments

6.1. All payments shall be effected by cheque, direct debit, BACS or other order drawn on the Council's bankers.

6.2. Following authorisation under Financial Regulation 5 above, the Council, a duly delegated committee or, if so delegated, the Clerk or RFO shall give instruction that a payment shall be made.

6.3. In the case of cheque payments, authorisation will be indicated by the signature of two authorised bank signatories on the face of the payment voucher(s). Cheques shall be signed by two of the bank signatories authorised by Council.

6.4. In the case of a schedule for BACS payments, authorisation will be indicated by the signature of two bank signatories authorised by the Council on the schedule.

6.5. Payments from the Imprest account, with the accompanying information about those payments, will be presented to two signatories authorised by the Council who will check the

supporting documentation on payments made and anticipated expenditure before authorising a transfer of funds to the Imprest account from the current account.

6.6. If thought appropriate by the Council payment for certain items may be made by internet banking transfer provided evidence is retained showing which authorised signatories approved the payment.

6.7. If thought appropriate by the Council, payment for utility supplies (energy, telephone and water) and any National Non-Domestic Rates may be made by variable direct debit provided that the instructions are signed by two authorised signatories and any payments are reported to Council as made.

6.8. Credit card payments shall only be made when it is not possible to pay by cheque or BACS, or where a saving to the Council can be made. Payments made by credit card must be approved by the Town Clerk, Deputy Town Clerk or Facilities Manager. Any expenditure is to be supported by a purchase order and invoice/receipt.

6.9. Any payments made under 6.3. to 6.8 are to be reported to the Policy & Resources Committee or Full Council.

6.10. A member who is a bank signatory, having a connection by virtue of family or business relationships with the beneficiary of a payment, should not, under normal circumstances, be a signatory to the payment in question.

6.11. Changes to account details for suppliers, which are used for internet banking shall be approved by the RFO.

6.12. The Finance Officer may provide petty cash to officers for the purpose of defraying operations and other expenses.

6.12.1. The Finance Officer shall maintain a petty cash float of up to £100 for the purpose of defraying operational and other expenses. Vouchers for the payments made from petty cash shall be kept, to substantiate the payment.

6.12.2. Income received must not be paid into the petty cash float but must be separately banked, as provided elsewhere in these regulations.

6.12.3. Payments to maintain the petty cash shall be made from the Town's Council's Imprest account and signed by two authorised signatories.

6.13. No employee or councillor shall disclose any PIN or password, relevant to the working of the Council or its bank accounts, to any person not authorised in writing by the Council or a duly delegated committee.

6.14. Where internet banking arrangements are made with any bank, the RFO shall be appointed as the Service Administrator. The bank mandate approved by the council shall identify a number of councillors who will be authorised to approve transactions on those accounts. The bank mandate will state clearly the amounts of payments that can be instructed by the use of the Service Administrator alone, or by the Service Administrator with a stated number of approvals.

7. Payment of salaries

7.1. As an employer, the Council shall make arrangements to meet fully the statutory requirements placed on all employers by PAYE and National Insurance legislation. The payment of all salaries shall be made in accordance with payroll records and the rules of PAYE and National Insurance currently operating, and salary rates shall be as agreed by Council, or duly delegated committee.

7.2. Payment of salaries and payment of deductions from salary such as may be required to be made for tax, national insurance and pension contributions, or similar statutory or discretionary deductions must be made in accordance with the payroll records and on the appropriate dates stipulated in employment contracts.

7.3. No changes shall be made to any employee's pay, emoluments, or terms and conditions of employment without the prior consent of the Staffing sub-committee and/or Policy & Resources Committee (where applicable).

7.4. Each and every payment to employees of net salary and to the appropriate creditor of the statutory and discretionary deductions shall be recorded in a separate confidential record (confidential cash book). This confidential record is not open to inspection or review (under the Freedom of Information Act 2000 or otherwise) other than:

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

7.5. The total of such payments in each calendar month shall be reported with all other payments as made as may be required under these Financial Regulations, to ensure that only payments due for the period have actually been paid.

7.6. All time records or other pay documents shall be certified as to accuracy by the individual's line manager and the Town Clerk or Deputy Town Clerk.

7.7. All claims for payment of car allowance, subsistence allowances, travelling and incidental expenses shall be submitted, duly certified by the line manager, Town Clerk or Deputy Town Clerk, in a form approved by the Town Clerk, except the Town Clerk's claims which shall be approved by the Leader of the Council or the Town Mayor.

7.8. Payments to Members, including co-opted Members of the Council or its committees, who are entitled to claim travelling or other allowances, will be made by the Town Clerk upon receipt of the prescribed form duly completed. All claims for the financial year are to be submitted not less frequently than quarterly.

7.9. Any termination payments shall be supported by a clear business case and reported to the Council. Termination payments shall only be authorised by Council.

7.10. Before employing interim staff, the Council must consider a full business case.

8. Loans and investments

8.1. All borrowings shall be effected in the name of the Council, after obtaining any necessary borrowing approval. Any application for borrowing approval shall be approved by Council as to terms and purpose. The application for borrowing approval, and subsequent arrangements for the loan shall only be approved by Full Council.

8.2. Any financial arrangement which does not require formal borrowing approval from the Secretary of State/Welsh Assembly Government (such as Hire Purchase or Leasing of tangible assets) shall be subject to approval by the Full Council. In each case a report in writing shall be provided to Council in respect of value for money for the proposed transaction.

8.3. All loans and investments shall be negotiated in the name of the Council and shall be for a set period in accordance with council policy.

8.4. The Council shall consider the need for an Investment Strategy and Policy which, if drawn up, shall be in accordance with relevant regulations, proper practices and guidance. Any Strategy and Policy shall be reviewed by the Council at least annually.

8.5. All investments of money under the control of the Council shall be in the name of the Council.

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

8.7. Payments in respect of short term or long-term investments, including transfers between bank accounts held in the same bank, or branch, shall be made in accordance with Regulation 5 (Authorisation of payments) and Regulation 6 (Instructions for payments).

9. Income

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

9.2. Particulars of all charges to be made for work done, services rendered or goods supplied shall be agreed annually by the Council, notified to the RFO and the RFO shall be responsible for the collection of all accounts due to the Council.

9.3. The Council will review all fees and charges at least annually, following a report of the Town Clerk.

9.4. Any sums found to be irrecoverable and any bad debts shall be reported to the Policy & Resources Committee. Policy & Resources Committee may recommend that the Council write-off any amount due to be paid to the Council.

9.5. All sums received on behalf of the Council shall be banked intact as directed by the RFO. In all cases, all receipts shall be deposited with the council's bankers with such frequency as the RFO considers necessary.

9.6. The origin of each receipt shall be entered on the paying-in slip.

9.7. Personal cheques shall not be cashed out of money held on behalf of the Council.

9.8. The RFO shall ensure that VAT Returns are promptly submitted and that any repayment claims are made and received, in accordance with VAT Act 1994 section 33.

9.9. Where any significant sums of cash are regularly received by the council, more than one person will be present when the cash is counted in the first instance, and the RFO will ensure that appropriate care is taken in the security and safety of individuals banking such cash.

10. Orders for work, goods and services

10.1. A purchase order shall be issued for all work, goods and services unless a formal contract is to be prepared or an official order would be inappropriate, eg for services provided under a contract agreement. Copies of orders shall be retained.

10.2. Order books shall be controlled by the RFO.

10.3. All members and officers are responsible for obtaining value for money at all times. An officer issuing an official order shall ensure as far as reasonable and practicable that the best available terms are obtained in respect of each transaction, usually by obtaining three or more quotations or estimates from appropriate suppliers, subject to any de minimis provisions in Regulation 11.1 below. Suppliers and services will be reviewed on a regular basis for cost efficiency.

10.4. A member may not issue an official order or make any contract on behalf of the council.

10.5. The Town Clerk is responsible for ensuring purchases made by the Council are lawful.

11. Contracts

11.1. Procedures as to contracts are laid down as follows:

a) Every contract shall comply with these financial regulations, and no exceptions shall be made otherwise than in an emergency provided that this regulation need not apply to contracts which relate to items (i) to (v) below:

i. for the supply of gas, electricity, water, sewerage and telephone services;

ii. for specialist services such as are provided by solicitors, accountants, surveyors and planning consultants;

iii. for work to be executed or goods or materials to be supplied which consist of repairs to or parts for existing machinery or equipment or plant;

iv. for work to be executed or goods or materials to be supplied which constitute an extension of an existing contract by the Council;

v. for goods or materials proposed to be purchased which are proprietary articles and / or are only sold at a fixed price.

b) Where the Council intends to procure or award a public supply contract, public service contract or public works contract as defined by The Public Contracts Regulations 2015

("the Regulations") which is valued at £25,000 or more, the Council shall comply with the relevant requirements of the Regulations¹.

c) The full requirements of The Regulations, as applicable, shall be followed in respect of the tendering and award of a public supply contract, public service contract or public works contract which exceed thresholds in The Regulations set by the Public Contracts Directive 2014/24/EU (which may change from time to time)².

d) When applications are made to waive financial regulations relating to contracts to enable a price to be negotiated without competition the reason shall be embodied in a recommendation to the Council.

e) Such 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. The invitation shall in addition state that tenders must be addressed to the Town Clerk in the ordinary course of post. Each tendering firm shall be supplied with a specifically marked envelope in which the tender is to be sealed and remain sealed until the prescribed date for opening tenders for that contract.

f) All sealed tenders shall be opened at the same time on the prescribed date by the Town Clerk in the presence of at least one member of council.

g) Any invitation to tender issued under this regulation shall be subject to Standing Orders and shall refer to the terms of the Bribery Act 2010.

h) When it is to enter into a contract of less than £25,000 in value for the supply of goods or materials or for the execution of works or specialist services other than such goods, materials, works or specialist services as are excepted as set out in paragraph (a) the Town Clerk or RFO shall obtain 3 quotations (priced descriptions of the proposed supply); where the value is below £3,000 and above £1,000 the Town Clerk or RFO shall strive to obtain 3 estimates. Otherwise, Regulation 10.3 above shall apply.

i) The Council shall not be obliged to accept the lowest or any tender, quote or estimate.

j) Should it occur that the Council, or duly delegated committee, does not accept any tender, quote or estimate, the work is not allocated and the Council requires further pricing, provided that the specification does not change, 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.

12. Payments under contracts for building or other construction works

12.1. Payments on account of the contract sum shall be made within the time specified in the contract by the RFO upon authorised certificates of the architect or other consultants engaged to supervise the contract (subject to any percentage withholding as may be agreed in the particular contract).

¹ The Regulations require councils to use the Contracts Finder website to advertise contract opportunities, set out the procedures to be followed in awarding new contracts and to publicise the award of new contracts

² Thresholds currently applicable are:

a) For public supply and public service contracts 209,000 Euros (£181,302)

b) For public works contracts 5,225,000 Euros (£4,551,413)

12.2. Where contracts provide for payment by instalments the RFO shall ensure that a record of all such payments is maintained. In any case where it is estimated that the total cost of work carried out under a contract, excluding agreed variations, will exceed the contract sum of 5% or more a report shall be submitted to the council.

12.3. Any variation to a contract or addition to or omission from a contract must be approved by the Council and Town Clerk to the contractor in writing, the Council being informed where the final cost is likely to exceed the financial provision.

13. Stores and equipment

13.1. The officer in charge of each section shall be responsible for the care and custody of stores and equipment in that section.

13.2. 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.

13.3. Stocks shall be kept at the minimum levels consistent with operational requirements.

13.4. The Finance Officer shall be responsible for arranging periodic checks of stocks and stores by persons other than those responsible (at least annually) and will report on these to the RFO.

14. Assets, properties and estates

14.1. The Town Clerk shall make appropriate arrangements for the custody of all title deeds and Land Registry Certificates of properties held by the Council. The RFO shall ensure a record is maintained of all properties held by the council, recording the 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.

14.2. No tangible moveable property shall be purchased or otherwise acquired, sold, leased or otherwise disposed of, without the authority of the Council, together with any other consents required by law, save where the estimated value of any one item of tangible movable property does not exceed £500.

14.3. No real property (interests in land) shall be sold, leased or otherwise disposed of without the authority of the Council, together with any other consents required by law. In each case a report in writing shall be provided to the Policy & Resources Committee 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) and any recommendations made to full Council.

14.4. No real property (interests in land) shall be purchased or acquired without the authority of the full Council. In each case a report in writing shall be provided to the Policy & Resources Committee 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) and any recommendations made to full Council.

14.5. Subject to the limit set in Regulation 14.2 above or identification within the agreed budget, no tangible moveable property shall be purchased or acquired without the authority of the full Council.

14.6. The RFO shall ensure that an appropriate and accurate Register of Assets and Investments is kept up to date. The continued existence of tangible assets shown in the Register shall be verified at least annually. Any losses shall be reported to the Policy & Resources Committee.

15. Insurance

15.1. Following the annual risk assessment (per Regulation 17), the RFO shall effect all insurances and negotiate all claims on the council's insurers.

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

15.3. The RFO shall keep a record of all insurances effected by the Council and the property and risks covered thereby and annually review it.

15.4. The RFO shall be notified of any loss liability or damage or of any event likely to lead to a claim and shall report these to the Policy & Resources Committee/Council at the next available meeting.

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

16. Charities

16.1. Where the Council is sole managing trustee of a charitable body the RFO shall ensure that separate accounts are kept of the funds held on charitable trusts and separate financial reports made in such form as shall be appropriate, in accordance with Charity Law and legislation, or as determined by the Charity Commission. The RFO shall arrange for any audit or independent examination as may be required by Charity Law or any Governing Document.

17. Risk management

17.1. The Council is responsible for putting in place arrangements for the management of risk. The Town Clerk shall prepare, for approval by the Council, risk management policy statements in respect of all activities of the Council. Risk policy statements and consequential risk management arrangements shall be reviewed by the Council at least annually.

17.2. When considering any new activity, the Clerk, with support from relevant officers, shall prepare a draft risk assessment including risk management proposals for consideration and adoption by the Council.

17.3 Risks will be prioritised and reviewed in line with government guidance.

18. Suspension and revision of Financial Regulations

18.1. It shall be the duty of the Policy & Resources Committee to review the Financial Regulations of the council at least every three years and to make such recommendations to the Council as the Committee considers are required. The Town Clerk shall make arrangements to monitor changes in legislation or proper practices and shall advise the Policy & Resources Committee/Council of any requirement for a consequential amendment to these Financial Regulations.

18.2. The Council may, by resolution of the Policy & Resources Committee/Council duly notified prior to the relevant meeting of Council, suspend any part of these Financial Regulations provided that reasons for the suspension are recorded and that an assessment of the risks arising has been drawn up and presented in advance to all members of Council.

Document approved by Council at its meeting of 29th July 2020.

Review date: annually



EARLEY TOWN COUNCIL

DATA PROTECTION POLICY

Our Commitment

The processing of personal information is important to us and the Council understands the importance of ensuring that personal data, including sensitive personal data is always treated lawfully and appropriately and that the rights of individuals are upheld.

The Council will only collect, use and hold personal data about individuals for the purposes of carrying out our statutory obligations, delivering services and meeting the needs of individuals. This includes, service users, members of the public, current, past and prospective employees, Members of the Council, stakeholders and other local authorities, public bodies or law enforcement agencies.

The Town Council will only keep data for as long as it is necessary to do so, as per our Retention Schedule.

Our Objectives

In order to comply with the requirements of the Data Protection Act 2018, including the UK General Data Protection Regulation, the Council will ensure that:

- Personal data is collected, used and held, lawfully and processed for the purpose it is intended.
- Regular data sharing with external partners and other relevant agencies will be subject to information sharing agreements and will only be entered into with third party under a duty of confidentiality and they will be obliged to implement appropriate measures to ensure data security.
- External agencies undertaking any data processing on behalf of the Council will be required to demonstrate compliance with the Data Protection Act 2018 and will require measures to be in place to protect personal data.
- Staff are aware of their responsibilities when processing personal information.
- Training is provided to ensure that those handling personal data are trained appropriately.
- The Deputy Town Clerk is the appointed person who has knowledge in data protection compliance and who is a point of contact for all queries.
- Subject Access rights can be fully exercised and will be dealt with promptly.
- Any new projects being implemented that involves personal data to be subject to a Data Protection Impact Assessment (DPIA).
- We will review and update this policy, procedures and guidance for Council employees and Members on a regular basis.

We are required by law to share or make available some of the personal data we collect and hold. This information may be shared for a number of reasons to safeguard public funds and for the prevention and detection of fraud, and for the prevention and detection of crime. For more details on this please read our General Privacy Notice.

We will fully comply with the requirements of the Data Protection Act 2018 and are registered as a data controller with the Information Commissioner's Office. Our registration number is Z7740800.

Meeting our Objectives

In order to meet our objectives we will ensure that the following are always considered and that appropriate controls and procedures are in place to ensure compliance with the Data Protection Act 2018.

Collecting and Processing Personal Data

- When we collect personal data we will ensure that where required, we make individuals aware that their information is being collected, the purpose for collecting the data and whether it will be shared with any third parties. This will be done through the use of privacy notices.
- No new purpose for processing data will take place until the Information Commissioner's Office has been notified of the relevant new purpose and the data subjects have been informed and consent has been sought where required.

Data Security

- Council employees and members must report any suspected data breaches to the responsible officer for investigation and where necessary a responsible officer will notify the Information Commissioner's Office
- Council employees and members must use appropriate levels of security to store or share personal data. Training will be provided to employees and members
- When undertaking new projects involving personal data, a Data Protection Impact Assessment (DPIA) will be carried out by the Project Manager and reviewed by a responsible officer in order to assess any potential privacy risks.

An Information Asset Register will be maintained by the Town Clerk & Deputy Town Clerk identifying:

- all personal data held.
- where it is held.
- how it is processed.
- who has access to it.

Personal data will not be shared with a third-party organisation without a valid reason and where required an individual will be notified that the sharing will take place in the form of a privacy notice. If any new purposes for the data sharing are to take place, consent from the individuals concerned must be obtained.

When personal data is to be shared regularly with a third party, a Data Sharing Agreement must be implemented.

Any data sharing will also take into consideration:

- the statutory basis of the proposed information sharing.
- whether the sharing is justified.
- how to ensure the security of the information being shared.

Data Access

- Our employees and members will have access to personal data only where it is a requirement of their job role.
- All data subjects have a right of access to their own personal data and further detail on how to request or access personal data held by us can be found on our website.
- Our employees and members are aware of what to do when requests for information are made under the Data Protection Act 2018.
- Our employees and members are made aware that in the event of a Subject Access Request being received, their emails may be searched and relevant content disclosed.
- A Subject Access Request will be acknowledged to the data subject within 24 hours, with the final response and disclosure of information (subject to exemptions) within 40 calendar days.
- A Subject Access Request will not be responded to until the individual requesting the information can verify their identity.
- Third party personal data will not be released when responding to a Subject Access Request, unless consent has been obtained, it is required to be released by law, or it is deemed reasonable to release.

Data Protection Officer (DPO)

Earley Town Council's Data Protection Officer is the Deputy Town Clerk who is responsible for ensuring the council's compliance with data protection legislation and to inform and advise on the council's data protection obligations.

Compliance with this Policy

This Policy applies to all council employees, members and all individuals or organisations acting on behalf of the council.

Date of adoption: xx July 2022

Date of review: July 2024



EARLEY TOWN COUNCIL

INFORMATION SECURITY POLICY

Introduction

This policy is set out to ensure the appropriate use of council IT equipment and computer systems and to safeguard the security of information and to ensure that staff and councillors understand what is and is not permitted.

Scope

This policy covers the computer systems and technology systems used by staff when carrying out council business.

Computer Access

Access to computer IT systems is controlled by user IDs and passwords. All user IDs and passwords have been assigned to individual staff members and staff members are responsible for ensuring that these details are used for the purpose they are intended.

Staff must: -

- Log out if they are away from their desk.
- Not carry out any changes to IT systems without authorisation from the council's IT service providers.
- Not attempt to access data that they are not authorised to access.
- Not connect unauthorised devices/personal devices.
- Not store council information on unauthorised equipment/devices.
- Not transfer data to a person/s outside the council unless authorised to do so.
- Notify the Town Clerk if a password is changed.

Emails

Note: also applies to councillors using official early-tc email addresses

Staff issued with email accounts are intended for council business use only. Personal use is permitted but only where it does not affect a staff member's work performance, is not detrimental to the council and does not breach any terms of employment or other legal obligations. Emails should be treated the same as any other form of documentation.

The following is considered unacceptable use of emails: -

- Forwarding confidential council emails/information to external emails.
- Distributing material which is illegal.
- Distributing material which is discriminatory, offensive or abusive.

All individuals are accountable for their actions when using email systems.

Staff should delete or archive emails on a regular basis when no longer required. In accordance with the Council's Retention Schedule, emails should only be kept for a certain period of time.

Staff must be aware of spam and phishing emails and should not reply to them and inform the council's IT service provider of any suspicious emails.

Emails sent by staff must have the council's appropriate disclaimer relating to the use of the information contained within the email.

Internet

Internet usage is intended for business use only. Personal use of the internet is permitted but only where it does not affect a staff member's work performance, is not detrimental to the council and does not breach any terms of employment or other legal obligations.

The following is considered unacceptable use of the internet: -

- Downloading unauthorised software or copyright material.
- Use of personal social media.
- Sending of offensive material.
- Visiting sites that contain pornographic, obscene, hateful or illegal material.
- To reveal confidential council information.
- To introduce viruses/malicious software onto the council's computer systems.

Telephone Systems

The telephone system is for council business only and staff should not use it to make personal calls unless they have obtained authorisation.

Mobile Phones

Staff who have been issued with a work mobile phone should only use their phone for council business. Staff must take care when displaying information on their phone and ensure that they take precautionary measures so not to disclose or display personal data or confidential information when using their phone in public.

Protecting Information

All staff must ensure that they reduce the risk of unauthorised access, loss of personal data and data breaches of council information by: -

- Logging off of their computer when not at their desk.
- Ensuring confidential information/personal data is not left unattended or is locked away.
- Not leaving confidential information/personal data on printers.
- Protecting access to mobiles phone with passcodes.
- Shredding any paper copies containing confidential information/personal data in accordance with the Council's Retention Schedule.

Remote Working

This policy is applicable to any member of staff when remote working.

Personal Devices

Personal devices are not to be connected to the council's computer systems unless authorised by the Town Clerk.

Personal devices are considered to be: -

- Laptops
- Tablets
- Smart Phones
- Portable Storage, e.g., hard drives, memory sticks, data cards
- Cameras

Removeable Storage

The use of council removeable storage is permitted and is the responsibility of the person operating the storage. Removeable storage must be used for council business only and when the data on the storage is no longer required, it should be deleted.

Removeable storage is considered to be: -

Memory Cards
USB sticks
Mobile devices – mobile phone, cameras etc
DVDs/CDs

Monitoring

The Council recognises the importance of an individual staff privacy but has to balance this against the requirement to protect information and preserve the integrity of the council. The council may on occasions carry out monitoring of the use of the council's IT systems.

The reasons for monitoring are: -

- To ensure staff are complying with this policy.
- To detect any inappropriate behaviour or communication.
- To ensure that personal data and sensitive information is being processed correctly.

The ways in which monitoring can be carried out are: -

- Physical inspection of computers and desks.
- Inspection of call logs
- Inspection of internet activity.
- Inspection of email activity.
- Inspection of telephone communication.

Breach of Policy

A breach of this policy could lead to disciplinary action being taken.

Date of adoption: xx July 2022

Date of review: July 2024



EARLEY TOWN COUNCIL

INFORMATION BREACH POLICY

Introduction

This policy demonstrates that the Council is complying to the Data Protection Act 2018, including the UK General Data Protection Regulation to ensure that personal data breaches are dealt with appropriately and in a timely manner.

What is a personal data breach?

The Information Commissioner's Office (ICO) defines a data breach as "*a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed*".

Risk Assessment

A risk assessment has been undertaken which identifies the various functions of the Council and information collected to help manage breaches on a day-to-day basis. This is documented in the council's Information Asset Risk Register.

Reporting a data breach

When an officer or councillor is aware that a data breach has occurred, they must report this immediately to the Town Clerk. If outside normal working hours, then as soon as possible.

Investigating a data breach

It will be the responsibility of the Deputy Town Clerk, as the Data Protection Officer to enter the details of the breach onto a Personal Data Breach Form on the ICO's website and to carry out a thorough investigation into the breach.

The investigation will assess the risks associated with the breach in relation to the potential consequences for individuals, the level of severity of those consequences and how likely they are to happen.

The investigation will consider the following: -

- The type of information involved.
- Was it human error or a system issue?
- The sensitivity of the information.
- The protections that are in place (e.g., passwords, encryptions).
- What has happened to the data (e.g., lost, stolen, disclosed).
- Whether the data could be used for illegal purposes.
- The individuals (data subjects) who will be affected, the number of individuals affected and the potential effects on those individuals.
- Whether there are any wider consequences.
- If there is high risk to adversely affecting individuals' rights and freedoms.
- Whether the personal data can be recovered to limit the damage the breach could cause.
- Who needs to be notified for immediate containment?
- Suitable action to be taken to resolve the incident.

Reporting a breach to the ICO

Not every breach needs to be reported to the ICO and the ICO's Self-Assessment can help determine whether a breach needs to be reported to them, this can be carried out at: -

<https://ico.org.uk/for-organisations/report-a-breach/personal-data-breach-assessment/>

The ICO must be informed of a breach if the breach: -

- will result in the risk to the rights and freedoms of an individual.
- will result in the risk of damage to reputation, financial implications, confidentiality loss, discrimination, social/economic disadvantage to an individual.

A breach must be reported to the ICO as soon as possible and no later than 72 hours of becoming aware of the breach, even if all the details of the breach are not known.

To report a breach to the ICO a Personal Data Breach Reporting Form must be completed which can be found at: - <https://ico.org.uk/for-organisations/report-a-breach/personal-data-breach/> and emailed to: - icocasework@ico.org.uk with the words "Personal Data Breach Notification" in the subject line.

Failure to report a breach to the ICO

Failure to notify the ICO of a breach when required to do so can result in a fine, along with the ICO's corrective powers.

Notifying affected individuals of a breach

Any individuals whose personal data has been affected by a breach and where it is considered likely to result in a high risk of adversely affecting an individual's rights and freedoms must be informed of the breach.

The following information must be provided to an individual affected: -

- How and when the breach occurred.
- The data involved.
- A description of the likely consequences.
- The actions taken or proposed to deal with the breach and to mitigate adverse effects.
- Steps the individual can take to protect themselves, such as password reset, looking out for phishing emails or fraudulent activity on accounts.
- The contact details of the person dealing with the breach.

Evaluation

Once the breach has been contained, a full review should be carried out to consider the causes of the breach, the effectiveness of the response in limiting adverse effects and to consider whether systems, policies or procedures need to be changed and whether further training is required.

Further information: -

<https://ico.org.uk/for-organisations/report-a-breach/>

Date of adoption: xx July 2022

Date of review: July 2024



EARLEY TOWN COUNCIL

WEBSITE PRIVACY & COOKIE POLICY

This policy applies to the content of the Town Council's website only (<https://www.earley-tc.gov.uk/>) and not to any external sites that we provide links to, including the Town Council's Facebook/Twitter page.

Privacy

The Council does not currently collect personal information from members of the public through our website site, as we do not have a "Contact Us" facility on our website.

We do use Google Analytics to help us understand how our customers use the site and you can read more about how Google uses your Personal Information at: <https://www.google.com/intl/en/policies/privacy/>

You can also opt-out of Google Analytics here: <https://tools.google.com/dlpage/gaoptout>

Use of Cookies

Cookies are small text files which are placed on your computer or mobile device by websites that you visit. Cookies are used in order to make websites work, provide information to site owners and to display content that is personalised to users based on their previous internet activity.

There are 2 different types of cookie which can be placed in your browser by a website:

Session cookies – are used for the timeframe you use the website, which are then deleted when you close your web browser. A new cookie would then be placed in your browser if you were to visit the same website again.

Persistent cookies - remain in your browser once you have left the site and closed your browser. The next time you visit the site the cookie will be used to make the website work as it did at the time of your previous visit. Persistent cookies will expire if the website is not visited again within a certain timeframe.

Examples of cookies can be:

- The storing of information to personalise a website to your requirements
- A website selling items uses cookies to record items you have in a shopping basket
- To record and analyse users activity on a website, for example what pages have been viewed

Cookies on This Website

We use standard cookies on our website. If you have any questions about the way cookies are used, or how you may be affected please contact us.

Managing Cookies on Your PC

You can choose to block cookies that are set by our website, however by doing this it may mean that some parts of the website will not work correctly.

Date of adoption: xx July 2022

Date of review: July 2024



EARLEY TOWN COUNCIL

FREEDOM OF INFORMATION POLICY

Introduction

This policy sets out how Earley Town Council will provide information to applicants who request information in writing from the council under the Freedom of Information Act 2000 and the Environmental Information Regulations 2004.

Scope

The Freedom of Information Act 2000 gives a general right of access to all types of recorded information held by the council. The Act gives the public greater access to information about the functions of the council. This policy should be read in conjunction with the council's Data Protection Policy and Freedom of Information Guidance.

The Council's Model Publication Scheme

The council has an adopted Model Publication Scheme which allows members of the public to view or obtain information held by the Town Council.

The ways in which to obtain information are as follow: -

Website

The Town Council's website holds routine information which the council publishes, so individuals should first visit the council's website to see if the information they require is available there.
<https://www.earley-tc.gov.uk/>

Request information

Submit a Freedom of Information request or EIR request in writing to: -

Town Clerk
Earley Town Council
Radstock House, Council Offices
Radstock Lane
Earley
Reading
RG6 5UL

Or by email to: townclerk@earley-tc.gov.uk

Requests must include name of requester, address for correspondence to be sent to, which can be an email address and details of the information being requested.

Date of adoption: xx July 2022

Date of review: July 2024



EARLEY TOWN COUNCIL

SUBJECT ACCESS REQUEST POLICY

Introduction

Under the General Data Protection Regulations (GDPR), an individual, as a data subject has a right to know what information the Council, as a data controller holds on them, why their data is being processed and whether it has been or will be shared with a third party and that their data is being processed lawfully. An individual can request this information as a Subject Access Request.

Responsibilities

It is the Council's responsibility to ensure that this policy is followed when dealing with a Subject Access Request. Data subjects are informed of their rights to access data, which is documented in the Council's Privacy Notice.

The Council's Subject to Access Request Guidance should be read in conjunction with this policy.

Subject Access Request (SAR)

- A SAR can be made verbally or made in writing, either by letter, email or social media. The request does not have to state it is a SAR but must be dealt with as one.
- A third party can make a SAR on behalf of another person if that person is entitled to act on behalf of the individual. It is the responsibility of the third party to provide evidence of their authority.
- A child can make a SAR for their own personal information if they are competent to do so dependent on the level of understanding of the child and not acting against their own best interests. A child can authorise someone else to act on their behalf such as a parent another adult or a representative.
- Whilst the Council does have a SAR Form, a data subject does not have to complete a request form, as GDPR determines a written request as sufficient.
- The Council must respond to a SAR within one month of receipt of a request. This time can be extended by 2 months if the request is complex or if a number of requests have been received from the same individual.
- The Council will perform a reasonable search for the requested information, however, is not required to conduct searches that are unreasonable or disproportionate to the importance of providing access to the information. Searches will be carried out of emails, including archived emails, word documents, spreadsheets, databases, filing systems, computer systems, memory sticks, CDs, DVDs and recordings.
- The Council can only refuse a request if an exemption or restriction applies, or if the request is manifestly unfounded or excessive.

- Any information will be provided to the data subject in a manner that is easy to understand and securely.
- The Council cannot charge for providing the requested information, unless legislation permits that a reasonable fee can be charged.

Subject Access Request Rights

The main legislative measures that give rights of access to records include:

The Data Protection Act 2018 (DPA) – rights for living individuals to access their own records. The right can also be exercised by an authorised representative on the individual's behalf.

The General Data Protection Regulations (GDPR) - Individuals have the right, under the General Data Protection Regulation (EU) 2016/679 (Articles 12 and 15) to request access to, or a copy of, information an organisation holds about them.

Complaints

Should a data subject make a complaint about the handling of their SAR, this must be dealt with in accordance with the Council's Complaint Process and the requestor should be advised that they may also complain to the Information Commissioners Officer at <https://ico.org.uk/global/contact-us> or at the Information Commissioners Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF or telephone 0303 123 1113, if they remain unhappy with the outcome of their complaint.

Compliance with this Policy

This Policy applies to all Council employees, members and all individuals or organisations acting on behalf of the Council.

Date of adoption: xx July 2022

Date of review: July 2024



EARLEY TOWN COUNCIL

RETENTION OF RECORDS & DISPOSAL POLICY

Introduction

Earley Town Council recognises that the efficient management of its records is necessary to comply with its legal and regulatory obligations and to contribute to the effective overall management of the council.

The council accumulates a vast amount of information and data during the course of its daily activities and this includes data generated internally in addition to information obtained from individuals and external organisations. This information is recorded in various different types of document.

Documents may be retained in either 'hard' paper form or in electronic forms. For the purpose of this policy, 'document' and 'record' refers to both hard copy and electronic records.

This policy and the Council's Retention Schedule identifies the council's obligations for retaining and destroying information in accordance with various legislations and best practice guidance.

Records created and maintained by the council are an important asset and as such measures need to be undertaken to safeguard this information. Properly managed records provide authentic and reliable evidence of the council's transactions and are necessary to ensure it can demonstrate accountability.

It is imperative that documents are retained for an adequate period of time. If documents are destroyed prematurely the council and individual officers concerned could face prosecution for not complying with legislation and it could cause operational difficulties, reputational damage and difficulty in defending any claim brought against the council.

In contrast to the above the council should not retain documents longer than is necessary. Timely disposal should be undertaken to ensure compliance with the General Data Protection Regulations so that personal information is not retained longer than necessary. This will also ensure the most efficient use of limited storage space.

Scope

This policy applies to all records created, received or maintained by Earley Town Council in the course of carrying out its functions. Records are defined as all those documents which facilitate the business carried out by Earley Town Council and which are thereafter retained (for a set period) to provide evidence of its transactions or activities.

Objective

The objective of this policy is to provide a working framework to determine which documents are:-

- Retained and for how long
- Disposed of information

There are some records that do not need to be kept or that are routinely destroyed as part of the council business. This usually applies to information that is duplicated, unimportant or only of a short-term value. Unimportant records of information include:

- With compliments' slips.
- Catalogues and trade journals.
- Non-acceptance of invitations.
- Trivial electronic mail messages that are not related to Council business.
- Requests for information such as maps, plans or advertising material.
- Out of date distribution lists.

Duplicated and superseded material such as stationery, manuals, drafts, forms, address books and reference copies of annual reports may be destroyed. Records should not be destroyed if the information can be used as evidence to prove that something has happened. If destroyed the disposal needs to be disposed of under the General Data Protection Regulations

Responsibilities

Earley Town Council has a corporate responsibility to maintain its records and record management systems in accordance with the regulatory environment. The person with overall responsibility for this policy is the Town Clerk. The person responsible for records management will give guidance for good records management practice and will promote compliance with this policy so that information will be retrieved easily, appropriately and timely.

Individual staff and employees have a responsibility to ensure that records for which they are responsible are accurate and are maintained and disposed of in accordance with Earley Town Council's records management guidelines. An annual review of documentation should be carried out to determine whether to retain or dispose of documents and that any unnecessary documentation being held is disposed of under the Data Protection Act 2018. All employees should be fully aware of the Council's Retention Schedule.

Document Retention Protocol

Councils should have in place an adequate system for documenting the activities of their service. This system should take into account the legislative and regulatory environments to which they work.

Records of each activity should be complete and accurate enough to allow employees and their successors to undertake appropriate actions in the context of their responsibilities to:

- Facilitate an audit or examination of the business by anyone so authorised.
- Protect the legal and other rights of the Council, its clients and any other persons affected by its actions.
- Verify individual consent to record, manage and record disposal of their personal data.
- Provide authenticity of the records so that the evidence derived from them is shown to be credible and authoritative.

To facilitate this the following principles should be adopted:

- Records created and maintained should be arranged in a record-keeping system that will enable quick and easy retrieval of information under the General Data Protection Regulations
- Documents that are no longer required for operational purposes but need retaining should be archived appropriately.

Appendix A: Retention Schedule is guidance on the recommended minimum retention periods for specific classes of documents and records. This schedule has been compiled from recommended best practice from the Public Records Office, the Records Management Society of Great Britain and in accordance with relevant legislation.

Whenever there is a possibility of litigation, the records and information that are likely to be affected should not be amended or disposed of until the threat of litigation has been removed.

Document Disposal Protocol

Documents should only be disposed of if reviewed in accordance with the following:

- Is retention required to fulfil statutory or other regulatory requirements?
- Is retention required to meet the operational needs of the service?
- Is retention required to evidence events in the case of dispute?
- Is retention required because the document or record is of historic interest or intrinsic value?

When documents are scheduled for disposal the method of disposal should be appropriate to the nature and sensitivity of the documents concerned. A record of the disposal will be kept to comply with the General Data Protection Regulations.

Documents can be disposed of by any of the following methods:

- Non-confidential records to be placed in wastepaper bin or recycling bin for disposal.
- Confidential records or records giving personal information to be shredded.
- Computer records to be deleted.
- Where documents are of historical interest it may be appropriate to transfer the records to an external body such as the local Records Office.

The following principles should be followed when disposing of records:

- All records containing personal or confidential information should be destroyed at the end of the retention period. Failure to do so could lead to the council being prosecuted under the UK General Data Protection Regulations.
- Where computer records are deleted steps should be taken to ensure that data is 'virtually impossible to retrieve' as advised by the Information Commissioner.
- Where documents are of historical interest it may be appropriate that they are transferred to the local Records Office.
- Back-up copies of documents should also be destroyed (including electronic or photographed documents unless specific provisions exist for their disposal).

Records should be maintained of high importance disposals such as financial or HR records etc.

These records should contain the following information:

- The name of the document destroyed.
- The date the document was destroyed.
- Person authorising the disposal.
- The method of disposal.

Data Protection Act 1998 – Obligation to Dispose of Certain Data

The Data Protection Act 1998 requires that personal information must not be retained longer than is necessary for the purpose for which it was originally obtained. The Data Protection Act defines personal information as "*data that relates to a living individual who can be identified*" from the data, or from those data and other information, which is in the possession of, or is likely to come into the possession of the data controller. It includes any expression of opinion about the individual and any indication of the intentions of the council or other person in respect of the individual.

The Data Protection Act provides an exemption for information about identifiable living individuals that is held for research, statistical or historical purposes to be held indefinitely provided that the specific requirements are met. The council is responsible for ensuring that they comply with the principles of the under the General Data Protection Regulations being:

- Personal data is processed fairly and lawfully and, in particular, shall not be processed unless specific conditions are met.
- Personal data shall only be collected for specific legitimate purposes and not processed in a manner incompatible with those purposes.
- Personal data shall be adequate, relevant, but not excessive.
- Personal data shall be accurate and up to date.
- Personal data shall not be kept for longer than is necessary.
- Personal data shall be processed in accordance with the rights of the data subject.
- Personal data shall be kept secure.

External storage providers or archivists that are holding council documents must also comply with the above principles of the General Data Protection Regulations.

Scanning of Documents

In general, once a document has been scanned on to a document image system the original becomes redundant. There is no specific legislation covering the format for which local government records are retained following electronic storage, except for those prescribed by HM Revenue and Customs. As a general rule hard copies of scanned documents should be retained for three months after scanning and then disposed of.

Original documents required for VAT and tax purposes should be retained for six years unless a shorter period has been agreed with HM Revenue and Customs.

Review of Document Retention

It is planned to review, update and where appropriate amend this document on a regular basis (at least every three years in accordance with the Code of Practice on the Management of Records issued by the Lord Chancellor).

This document has been compiled from various sources of recommended best practice and with reference to the following documents and publications:

- Local Council Administration, Charles Arnold-Baker, 910h edition, Chapter 11
- Local Government Act 1972, sections 225 – 229, section 234
- SLCC Advice Note 316 Retaining Important Documents
- SLCC Clerks' Manual: Storing Books and Documents
- Lord Chancellor's Code of Practice on the Management of Records issued under Section 46 of the Freedom of Information Act 2000

Retention Schedule

Please see Appendix A Retention Schedule document which is updated regularly in accordance with any changes to legal requirements.

Date of adoption: xx July 2022

Date of review: July 2024

**WOKINGHAM BOROUGH COUNCIL'S INDEPENDENT
REMUNERATION PANEL (Town and Parish Remuneration Panel)
TOWN/PARISH COUNCIL/PARISH MEETING QUESTIONNAIRE**

RETURN FORTOWN/PARISH COUNCIL

1. Does the Town/Parish Council currently pay an allowance to the Chairman in accordance with section 15(5) of the Local Government Act 1972 (i.e, such reasonable allowance as the Town/Parish council thinks appropriate for the purpose of enabling the Chairman to meet the expenses of his office) and, if so, what is the level?

2. Does the Town/Parish Council wish to consider paying the Chairman a Basic Allowance for time spent on that office under an allowances scheme made in accordance with The Local Authorities (Members' Allowances) (England) Regulations 2003?

3. Does the Town/Parish Council wish to consider paying *elected* Town/Parish Councillors a Basic Allowance under an allowances scheme made in accordance with the 2003 regulations to cover (a) time spent as a Councillor and (b) expenses incurred for example to be used towards caring costs for family members?

4. Does the Town/Parish Council wish to consider paying a travelling and subsistence allowance to Town/Parish Councillors (whether elected or otherwise) under a scheme made in accordance with the 2003 regulations?

5. How often does the Town/Parish Council and (if relevant) its Committees and Sub-Committees meet?

Please return via email to Callum Wernham, Clerk to the Panel, by Friday 23rd September 2022

callum.wernham@wokingham.gov.uk

Or alternatively by post:

FAO: Callum Wernham
Wokingham Borough Council
Democratic Services
Shute End
Wokingham
RG40 1BN

RECORD OF COUNCILLOR ATTENDANCES – 2022/23

NAME OF COUNCILLOR	COUNCIL											AMENITIES											PLANNING											POLICY & RESOURCES						
	05	06	07	10	11	02	03	05	06	09	11	1	03	05	06	07	08	09	10	11	12	01	02	03	04	06	07	09	11	01	03									
A. BASSETT	✓	✓						✓						✓														✓												
G. BHANGRA								✓																																
N. BROCK	✓	✓						✓																																
D. CHOPPING																																								
J. CLARK	✓																										✓	✓												
R. COOK	✓													✓		✓																								
M. EASTWELL	✓	✓						✓																																
J. EASTWELL	✓	✓																									✓	✓												
D. HARE	✓	✓																									✓	✓												
R. HOULBROOKE	✓	✓																									✓	✓												
D. IRELAND	✓	✓						✓																																
C. JONES	✓	B																									✓	✓												
I. KHAYINZA	✓	✓																																						
G. LITTLER	✓	✓												✓	✓	✓																								
A. LONG	✓	✓						✓	✓																															
T. MAHER	✓	✓						R																																
S. MATTHEWS	✓	✓						✓	✓																		✓	✓												
A. MICKLEBURGH	B	B											✓		✓	✓											✓													
A. NEAL	✓	B											B		✓																									
A. NEWTON	✓	✓						✓	✓																															
R. SANGSTER	✓												✓	✓	✓	✓																								
M. SHAW	✓	✓											✓	✓	✓	✓																								
C. SMITH	✓	✓							✓				✓	✓	✓	✓											✓													
M. SMITH	✓	✓											B	✓	✓	✓																								
K. YABSLEY	✓	✓						✓	✓																															

R = Representing Town Council B = Attending Borough Meeting A = In Attendance hatched = Covid: Virtual shaded cell denotes non-representation on Committees

June 2022 Barclaycard

ORDERS FOR PAYMENT - BY BARCLAYCARD

Number	Supplier	Purchase Description	Amount
5008	Zoom Communciations	Video Communications June 22	£14.39
5009	Argos Ltd	Microwave MPCC	£60.00
5010	Buxtons	CEM Strimmer + PPE Trousers/Helmet	£366.28
5011	Jax First Aid	First Aid items	£63.11
5012	Buxtons	PPE Trousers and Gloves	£97.06
5013	Screwfix	New Drill and Bits	£224.78
5014	Gardoo	Playsand SJP	£649.95
5015	Royal Mail	Stamps	£80.25
5016	NALC	Councillor Training	£38.93
5017	L & S Engineers Ltd	Hedgetrimmer Handle Frame	£32.22

Total Barclaycard £1,626.97

Date Prepared: 7th July 2022

ORDERS FOR PAYMENT - BY BACS TRANSFER

Number	Supplier	Purchase Description	Amount
5018	2468 Limited	CP Boiler Rental Qtr to 31/10/22	£119.21
5019	ArmourArbor	MELNR Remove Fallen Tree	£150.00
5020	Enerveo (formerly SSE Contracting)	Street light repairs Salcombe Drive	£78.55
5021	Enerveo (formerly SSE Contracting)	Street Light Quarterly Maint.June 22	£166.86
5022	Frasers Office	RH Stationery, Stamps, Paper, Ink cartridges	£676.36
5023	Frasers Office	Credit for returned Ink Cartridge (wrong colour)	-£57.00
5024	Frasers Office	Credit for Large 2nd class stamps returned	-£252.00
5025	Frasers Office	Stamps, Ink Cartridge for RH & Fridge for RLC Hub	£347.20
5026	MFG UK Ltd	Managed IT Support July 22	£717.42
5027	MFG UK Ltd	SD Fibre Internet link	£68.34
5028	MFG UK Ltd	Microsft 365	£780.54
5029	McVeigh Parker	MELNR Gate and Posts etc	£413.50
5030	Ricoh Uk Ltd	RH & SD Rental qtr to 30/9/22	£652.51
5031	Southern Maintenance Solutions UK Ltd	MPCC Gas Leak Repair and test	£189.00
5032	Tradepoint	MPCC Ant powders	£16.09
5033	Tradepoint	MPCC Ceiling Lamp	£16.15
5034	Tradepoint	Cem Cement	£42.96
5035	Web Marketing Matters	Website Maintenance June 22	£180.00

Total: £4,305.69

Date Prepared: 12th July 2022

IMPREST ACCOUNT

ORDERS FOR PAYMENT - BY DIRECT DEBIT

May & June

Number	Supplier	Purchase Description	Amount
	May 22 and June 22		
57	SGW Payroll	May payroll processing	£68.40
58	SGW Payroll	June payroll processing	£68.40

Total Direct Debits £136.80

Date Prepared: 05/07/22

IMPREST ACCOUNT - Reimbursement Vouchers 701 - 707
Vouchers between 29th June 2022 and 15th July 2022

Number	Details	Amount
701	Return of Damage Deposit SJ	£50.00
702	Return of Damage Deposit SR	£50.00
703	Reissue of a Party booking hold Deposit SA	£100.00
704	HMRC July Payroll	£8,739.01
705	LGPS July Payroll	£13,362.93
706	Prudential AVCs July Payroll	£200.00
707	Salaries July 22	£31,462.86
	Total Payments	<u>£53,964.80</u>