SANDOWN TOWN COUNCIL

Complaints Procedure (including Vexatious Complaints)

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1. COMPLAINTS REGARDING COUNCILLORS

1.1. Pursuant to section 27 of the Localism Act 2011, Sandown Town Council ('the Council') has adopted a Code of Conduct to promote and maintain the high standards of behaviour by its Members and co-opted Members.

1.2. The code applies whenever they conduct the business of the Council including:

- the business of the office to which they were elected or appointed; or
- when they claim to act; or
- give the impression of acting as a representative of the Council.

1.3. The Localism Act 2011 requires local authorities to establish arrangements to deal with allegations of breaches by councillors of the Members' Code of Conduct.

1.4. Therefore, any complaints against a member of Sandown Town Council are considered by the Monitoring Officer of the Isle of Wight Council.

1.5. Please click on the link or refer to the Isle of Wight Councils website for the procedure for making a complaint against a councillor. If you would like a copy emailed or posted to you please contact the clerk.

2. INTRODUCTION

2.1. Sandown Town Council will do their utmost to settle complaints and satisfy any complaint made.

2.2. If a complaint is not settled by the Town Council, it cannot refer the complaint to any other body for settlement.

2.3. A complaint can however be referred to the Monitoring Officer, if the complainant considers that members of the council, while considering the complaint, breached the Member Code of Conduct.

2.4. The council will not tolerate abusive or bullying contacts.

3. PROCESS FOR MAKING A COMPLAINT.

3.1. Making a Complaint

3.1.1. Complaints in the first instance should be addressed to the clerk.

3.1.2. If the complainant prefers not to put the complaint to the Clerk, he or she shall be advised to put it to the Lead Member for Complaints.

3.2. Stage 1:

Oral Complaints

3.2.1. If a complaint about procedures or administration is notified orally to a Councillor or the Clerk and they cannot satisfy the complainant fully, the complainant shall be asked to put the complaint in writing to the Clerk.

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Written Complaints

3.2.2. On receipt of a written complaint the Clerk or Lead Member, shall try to settle the complaint directly with the complainant.

3.2.3. If the complaint is about the behaviour of the Clerk, they will be notified and given an opportunity for comment on the allegation and the intended method of dealing with and resolving the complaint.

3.2.4. If a written complaint is dealt with to the satisfaction of the complainant, it will be reported at the next council meeting.

3.3. Stage 2:

3.3.1. If a complaint cannot be settled to the satisfaction of the complainant, it shall be brought to the next meeting of the Council for decision.

3.3.2. The complainant will be advised on which date the complaint will be considered.

3.3.3. The Council shall consider whether the circumstances attending any complaint warrant the matter being discussed in the absence of the press and public.

3.3.4. Any decision on a complaint shall be announced at the council meeting in public.

3.3.5. Council shall defer dealing with any written complaint only if:

(a) It is of the opinion that issues of law or practise arise on which advice is necessary; or

(b) Further evidence is required.

3.3.6. In such cases the complaint shall be dealt with at the next meeting after the advice has been received.

3.3.7. As soon as is reasonably possible after the decision has been made, the decision and any action to be taken shall be communicated in writing to the complainant.

4. VEXATIOUS (UNREASONABLE) COMPLAINTS AND BEHAVIOUR

4.1. Purpose of Policy in regard to Vexatious Complaints and Behaviour

4.1.1. This policy intends to:

(a) Assist in identifying and managing persons who are disruptive to the Council through pursuing an unreasonable course of conduct.

(b) Provide a mechanism for dealing with all complainants in ways which are demonstrably consistent, fair and reasonable.

4.1.2. Habitual or vexatious questions and complainants can be problematic for council staff and councillors. The difficulty in handling such complainants is that they are time consuming and wasteful of resources in terms of Officer and Member time.

4.1.3. There are situations when there is nothing further which can reasonably be done to assist or to rectify a real or perceived problem.

4.1.4. Examples of Contacts which might be considered unreasonable would include:

(a) Constant repetition of a query when reasonable answer has been given.

(b) Ongoing questions of details when the substance of a matter is closed.

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(c) Repeated questions in relation to a matter over which the town council has no authority.

(d) The council will not tolerate abusive or bullying contacts.

4.2. In some cases, complaints made either individually or as part of a group, or a group of complainants, might be considered habitual or vexatious.

4.3. Terminology and Definitions relating to Vexatious Complaints.

4.3.1. In this policy the term habitual means 'done repeatedly or as a habit'.

4.3.2. The term vexatious is recognised in law and means 'denoting an action or the bringer of an action that is brought without sufficient grounds for winning, purely to cause annoyance to the defendant'.

4.3.3. The term complaint in this policy includes requests made under the Freedom of Information Act 2000 and the Data Protection Act 1998 and reference to the Complaints Procedure is, where relevant, to be interpreted as meaning a request under those Acts.

4.3.4. Sandown Town Council define unreasonably persistent and vexatious complainants as those complainants who, because of the frequency or nature of their contacts with the Council, hinder the Council's consideration of their or other people's complaints.

4.3.5. The description 'unreasonably persistent' and 'vexatious' may apply separately or jointly to a particular complainant.

4.3.6. For the purpose of this policy the following definition of habitual or vexatious complainants will be used:

The repeated and/or obsessive pursuit of:

(a) unreasonable complaints and/or unrealistic outcomes; and or

(b) reasonable complaints in an unreasonable manner.

4.3.7. Examples include the way in which, or frequency with which, complainants raise their complaint with staff or how complainants respond when informed of the Council's decision about the complaint.

4.3.8. Features of an unreasonably persistent and/or vexatious complainant include the following (the list is not exhaustive, nor does one single feature on its own necessarily imply that the person will be considered as being in this category):

(c) Have insufficient or no grounds for their complaint and be making the complaint only to annoy (or for reasons that he or she does not admit or make obvious).

(d) Refuse to specify the grounds of a complaint despite offers of assistance.

(e) Refuse to co-operate with the complaints investigation process while still wishing their complaint to be resolved.

(f) Refuse to accept that issues are not within the remit of the complaints policy and procedure despite having been provided with information about the scope of the policy and procedure.

(g) Refuse to accept that issues are not within the power of the Council to investigate, change or influence.

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(h) Insist on the complaint being dealt with in ways which are incompatible with the complaint's procedure or with good practice (e.g., insisting that there must not be any written record of the complaint).

(i) Make what appear to be groundless complaints about the staff dealing with the complaints and seek to have them dismissed or replaced.

(j) Make an unreasonable number of contacts with the Council, by any means in relation to a specific complaint or complaints.

(k) Make persistent and unreasonable demands or expectations of staff and/or the complaints process after the unreasonableness has been explained to the complainant (an example of this could be a complainant who insists on immediate responses to questions, frequent and/or complex letters, faxes, telephone calls or emails).

(l) Harass or verbally abuse or otherwise seek to intimidate staff dealing with their complaint, in relation to their complaint by use of foul or inappropriate language or by the use of offensive and racist language.

(m) Raise subsidiary or new issues whilst a complaint is being addressed that were not part of the complaint at the start of the complaint process.

(n) Introduce trivial or irrelevant new information whilst the complaint is being investigated and expects this to be taken into account and commented on.

(o) Change the substance or basis of the complaint without reasonable justification whilst the complaint is being addressed.

(p) Deny statements he or she made at an earlier stage in the complaint process.

(q) Electronically record meetings and conversations without the prior knowledge and consent of the other person(s) involved.

(r) Adopts an excessively 'scattergun' approach, for instance, pursuing a complaint or complaints not only with the Council, but at the same time with, for example, a Member of Parliament, other Councils, elected Councillors of this and other Councils, the Council's Independent Auditor, the Standards Board, the Police or solicitors.

(s) Refuse to accept the outcome of the complaint process after its conclusion, repeatedly arguing the point, complaining about the outcome, and/or denying that an adequate response has been given.

(t) Make the same complaint repeatedly, perhaps with minor differences, after the complaints procedure has been concluded and insist that the minor differences make these 'new' complaints which should be put through the full complaints procedure.

(u) Persistently approach the Council through different routes about the same issue

(v) Persist in seeking an outcome which Council has explained is unrealistic for legal or policy (or other valid) reasons.

(w) Refuse to accept documented evidence as factual.

(x) Complain about or challenge an issue based on an historic and/or an irreversible decision or incident.

(y) Combine some or all of these features.

4.3.9. Raising of legitimate queries or criticisms of a complaints procedure as it progresses, for example if agreed timescales are not met, should not in itself lead to someone being regarded as a vexatious or an unreasonably persistent complainant.

4.3.10. Similarly, the fact that a complainant is unhappy with the outcome of a complaint and seeks to challenge it, this should not necessarily cause him or her to be labelled vexatious or unreasonably persistent.

4.4. Decision Making

4.4.1. Since vexatious complaints impact on council staff welfare and capacity, where complainants have been, and continue to be identified as potentially habitual or vexatious in accordance with the criteria set out in Section 3, officers will refer the matter to the Human Resources Committee for a decision on:

(a) Agreement to issue warning correspondence (Virtually).

(b) Agreement to treat the complainant as a habitual or vexatious complainant if behaviour persists (Meeting).

(c) Agreement regarding the appropriate course of action to be taken if behaviour continues (Meeting).

4.5. Vexatious Procedure – First Stage

4.5.1. Sandown Town Council will ensure that the complaint is being, or has been, investigated properly according to the adopted complaints procedure.

4.5.2. Prior to considering its implementation the Council will send a summary of this policy to the complainant to give them prior notification of its possible implementation.

4.5.3. The Clerk will contact the complainant in writing, or by email, to explain why this behaviour is causing concern and ask them to change this behaviour and outline the actions that the council may take if they do not comply (the Warning).

4.5.4. If the disruptive behaviour continues, the Clerk will issue a reminder letter to the complainant advising them that the way in which they will be allowed to contact the Town Council in future will be restricted (second Warning).

4.6. Vexatious Procedure – Second Stage

4.6.1. If the disruptive behaviour continues a meeting of the Human Resource Committee will be called.

4.6.2. A decision will be made on:

(a) Treat the complainant as a habitual or vexatious due to behaviour persisting.

(b) Appropriate course of action to be taken.

4.6.3. Following a decision by the committee to declare the complainant as habitual or vexatious:

(a) The Clerk on behalf of the Town Council will notify complainants, in writing or by email, of the reasons why their complaint has been treated as habitual or vexatious and the action that will be taken.

(b) The correspondence will include:

- Why the decision has been taken;
- What procedures have been put in place and;
- The duration of that action.

4.6.4. The Isle of Wight Council will also be informed that a constituent has been designated as a habitual or vexatious complainant.

4.6.5. The status of the complainant will be kept under review. If a complainant subsequently demonstrates a more reasonable approach, then their status will be reviewed.

4.6.6. Any restriction that is imposed on the complainant's contact with the Council will be appropriate and proportionate and the complainant will be advised of the period of time that the restriction will be in place for.

4.6.7. In most cases restrictions will apply for between 3-6 months, but in exceptional cases, this may be extended. In such cases the restrictions would be reviewed on a quarterly basis.

4.6.8. The fact that a complainant is judged to be unreasonably persistent or vexatious, and any restrictions imposed on Council's contact with him or her, will be recorded and notified to those who need to know within the Council.

4.7. Vexatious Procedure – Further Actions

4.7.1. Where a complainant continues to behave in a way that is unacceptable, the Clerk, in consultation with the Complaints Committee may decide to refuse all contact with the complainant and stop any investigation into his or her complaint.

4.7.2. Where the behaviour is so extreme or it threatens the immediate safety and welfare of staff, other options will be considered, eg the reporting of the matter to the police or taking legal action. In such cases, the complainant may not be given prior warning of that action.

4.8. Restrictions

Restrictions will be tailored to deal with the individual circumstances of the complainant and may include (the list is not exhaustive):

(a) Restricting the complainants contact with officers by telephone to through a third party e.g. a solicitor, a Councillor or a friend acting on their behalf.

(b) Prohibiting the complainant from sending emails to individual and/or all Council Officers and insisting they only correspond through a nominated councillor, usually the Mayor.

(c) Requiring contact to take place with one named member of staff only.

(d) Requiring contact to take place through a single medium.

(e) Restricting telephone calls to specified days and/or times and/or duration.

(f) Requiring any personal contact to take place in the presence of an appropriate witness.

(g) Informing the complainant know that Sandown Town Council will not reply to, or acknowledge any further contact, from them on the specific topic of that complaint (in

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this case, a designated member of staff will be identified who will read future correspondence)

4.9. New complaints from complainants who are treated as abusive, vexatious or persistent

4.9.1. New complaints from people who have come under this policy will be treated on their merits. The Clerk and the Human Resources Committee will decide whether any restrictions that have been applied before are still appropriate and necessary in relation to the new complaint.

4.9.2. A blanket policy is not supported, nor is ignoring genuine service requests or complaints where they are founded.

4.10. Review

4.10.1. The status of a complainant judged to be unreasonably persistent or vexatious will be reviewed by the Clerk, and the Human Resources Committee after three months, and at the end of every subsequent three months within the period during which the policy is to apply.

4.10.2. The complainant will be informed of the result of this review if the decision to apply this policy has been changed or extended.

4.11. Record Keeping

4.11.1. The Clerk will retain adequate records of the details of the case and the action that has been taken. Records will be kept of:

(a) The name and address of each complainant considered abusive, vexatious or persistent.
(b) Detail of any warnings issued (date, if response received).
(c) The start and end date of any period of restriction.
(d) The nature of the restriction.
(e) The date of the decision.
(f) The date the complainant and Council were notified.

4.11.2. The Council will be provided with an annual report giving information about members of the public who have been treated as vexatious/persistent as per this policy.

4.12. Right of Appeal

4.12.1. A complainant declared Vexatious by the Human Resources Committee may appeal the decision by requesting the matter be brought to the next meeting of Full Council.

4.12.2. This request must be made via email or in writing.

4.12.3. The complainant will be notified of the date of the meeting.

4.12.4. The relevant documents will be circulated to all members.

4.12.5. A decision will be made at the start of the Agenda item if the matter will be debated or if Council supports the Committees decision without further discussion.

4.12.6. The complainant will be notified in writing of the outcome of the meeting.

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SANDOWN TOWN COUNCIL

Code of Conduct

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1. INTRODUCTION AND INTERPRETATION

1.1. This Code applies to all elected and co-opted members of the Parish Council whenever they act in their role as a councillor or representative of the council. It is the responsibility of each member to comply with the provisions of this Code.

2. NOLAN PRINCIPLES – THE SEVEN PRINCIPLES OF PUBLIC LIFE

2.1. Councillors should observe the "Nolan Principles – the Seven Principles of Public Life":

Selflessness

2.2. Holders of public office should act solely in terms of the public interest.

Integrity

2.3. Holders of public office must avoid placing themselves under any obligation to people or organisations that might try inappropriately to influence them in their work. They should not act or take decisions in order to gain financial or other material benefits for themselves, their family or their friends. They must declare and resolve any interests and relationships.

Objectivity

2.4. Holders of public office must act and take decisions impartially, fairly and on merit, using the best evidence and without discrimination or bias.

Accountability

2.5. Holders of public office are accountable to the public for their decisions and actions and must submit themselves to the scrutiny necessary to ensure this.

Openness

2.6. Holders of public office should act and take decisions in an open and transparent manner. Information should not be withheld from the public unless there are clear and lawful reasons for so doing.

Honesty

2.7. Holders of public office should be truthful. They must declare any private interests relating to their public duties and take steps to resolve any conflicts arising in a way that protects the public interest.

Leadership

2.8. Holders of public office should exhibit these principles in their own behaviour. They should actively promote and support the principles and be willing to challenge poor behaviour wherever it occurs.

3. SCOPE

3.1. You must comply with this Code whenever you:

(a) conduct the business of the council; or

(b) act, claim to act, or give the impression that you are acting in your official capacity as a representative of the council.

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3.2. This Code does not apply to your private conduct unless that conduct could reasonably be regarded as bringing your office or the council into disrepute.

3.3. Where you act as a representative of the council on another body, you must comply with any lawful code or rules applicable to that body.

4. GENERAL OBLIGATIONS

4.1. When acting in your role as a member of the council you must:

(a) Treat others with respect.

(b) Not bully, harass or intimidate any person.

(c) Not do anything that may cause the council to breach equality law, including the Equality Act 2010.

(d) Not intimidate or attempt to intimidate any person involved in a complaint, investigation or proceedings relating to an alleged breach of this Code.

(e) Not compromise, or attempt to compromise, the impartiality of anyone who works for or on behalf of the council.

(f) Not disclose confidential information except where

- you have consent to do so;
- you are required by law to do so;
- the disclosure is made for the purpose of obtaining professional advice; or
- the disclosure is reasonable, lawful and in the public interest.

(g) Not prevent another person from gaining access to information to which they are entitled by law.

(h) Not conduct yourself in a manner that could reasonably be regarded as bringing your office or the council into disrepute.

(i) Not use your position improperly to secure an advantage or disadvantage for yourself or another person.

(j) When using council resources:

- act in accordance with the council's requirements; and
- ensure resources are not used improperly for political purposes.

(k) Have regard to any applicable code of publicity made under the Local Government Act 1986.

(l) Have regard to advice provided by the Proper Officer, Responsible Financial Officer or Monitoring Officer where relevant.

(m) Give reasons for decisions where required by law or council procedure.

5. REGISTER OF INTERESTS

5.1. You must register your Disclosable Pecuniary Interests within 28 days of election or co-option and notify the Monitoring Officer of any changes within 28 days.

5.2. A "Disclosable Pecuniary Interest" means an interest of yourself or your partner relating to:

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- employment, trade or profession;
- sponsorship;
- contracts with the council;
- land and property within the council area;
- licences to occupy land;
- corporate tenancies; or
- securities and shareholdings.

5.3. The register of interests will be available for public inspection and published in accordance with legal requirements.

6. DECLARATION OF INTERESTS

6.1. Where you have a Disclosable Pecuniary Interest in any matter being considered at a meeting, you must:

(a) declare the interest;

(b) explain the nature of the interest;

(c) not participate in discussion or voting on the matter unless a dispensation has been granted;

(d) leave the meeting room while the matter is being considered unless permitted to remain under a dispensation; and

(e) not seek improperly to influence the decision.

7. SENSITIVE INTERESTS

7.1. Where you consider that disclosure of the details of an interest could lead to you or a connected person being subject to violence or intimidation, and the Monitoring Officer agrees, the details may be withheld from public inspection in accordance with the Localism Act 2011.

8. DISPENSATIONS

8.1. The council may grant a dispensation allowing a member to participate in discussion and voting where permitted by law.

8.2. Applications for dispensations must be made in writing to the Monitoring Officer.

9. PERSONAL INTERESTS

9.1. You must register and declare any personal interests required by law or council procedure.

9.2. A personal interest may arise where a matter affects:

- a body to which you have been appointed by the council;
- a charitable body, political party or trade union of which you are a member; or
- the wellbeing or financial position of yourself, your family, close associates or persons with whom you have a close association.

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- Where a personal interest is so significant that it could reasonably be regarded as affecting your judgement or giving rise to bias or predetermination, you should declare the interest and withdraw from the meeting during consideration of the item.

10. GIFTS AND HOSPITALITY

10.1. You must notify the Monitoring Officer of any gift or hospitality with an estimated value exceeding £50 received in your role as a councillor.

10.2. Such notifications will be included in the council's register of interests where required.

11. COMPLAINTS PROCEDURE

11.1. The council shall maintain arrangements under the Localism Act 2011 for dealing with allegations that a councillor has failed to comply with this Code.

11.2. Complaints will normally be handled in conjunction with the Monitoring Officer of the principal authority.

11.3. An Independent Person may be consulted in accordance with the requirements of the Localism Act 2011.

12. SANCTIONS FOR BREACH OF THE CODE

12.1. Where a breach of the Code is found, the council may impose or recommend one or more of the following sanctions:

(a) publication of findings;

(b) formal censure or reprimand;

(c) removal from committees or outside appointments;

(d) recommendation of training;

(e) withdrawal of council facilities, where appropriate; or

(f) exclusion from council offices except for attendance at meetings where legally entitled.

12.2. The council has no power to suspend or disqualify a councillor or to withhold a member's allowance.

13. CRIMINAL OFFENCES

13.1. It is a criminal offence to:

- fail to register a Disclosable Pecuniary Interest;
- fail to disclose a Disclosable Pecuniary Interest at a meeting;
- participate in discussion or voting where prohibited;
- knowingly or recklessly provide false or misleading information regarding interests.

13.2. Penalties are determined by the courts in accordance with the Localism Act 2011.

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SANDOWN TOWN COUNCIL

Grant Award Policy

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1. INTRODUCTION

1.1. The Council can use Section 137 of the Local Government Act 1972 to award grants.

1.2. An allocated amount is included in the budget each year to facilitate this.

1.3. The following policy sets out how Sandown Town Council considers and makes grant awards.

1.4. The policy enables the council to make an informed and fair assessment of grant applications, so that decisions made in relation to grant applications within the allocated grant budget are made in a way which is fair and transparent.

2. GENERAL PRINCIPLES

2.1. Grants will only be awarded for activities and projects that are:

(a) In the interests of the town; or

(b) For the benefit for some, or all, of the residents of Sandown; or

(c) Improve the range of services in the town.

2.2. Grants can be awarded to voluntary groups, charitable bodies, and community organisations, including new organisations or bodies being established.

2.3. Generally, only one grant will be awarded to an organisation in any financial year.

2.4. The award of a grant in any given year does not set a precedent for or preclude the award of a grant in a subsequent year.

2.5. Applications from organisations with substantial unallocated resources will not be considered a priority for funding.

2.6. Decisions made by the Council on grant applications are solely a matter for and at the discretion of the Council.

2.7. The Town Council reserves the right to decline any application or to apply conditions to the grant.

2.8. Recognition of the grant from Sandown Town Council must be made in any publicity details of the grant award will be published by the council in its accounts and other published documents.

2.9. The Town Council recognises that for smaller organisations with lesser levels of governance and financial management or recently formed with little history, a small grant can make a major difference. To cater for this, there will be a lesser burden of information required for small grants up to £200. Whilst for larger grants, the Council needs to be assured of a higher level of governance and financial management, and a more detailed level of information will be required to consider a grant application.

2.10. Applications submitted without the required supporting information, will not be considered.

3. AMOUNTS AWARDED

3.1. There are no upper or lower limits set for the amount of any grant, but generally they will be restricted to a level of £500.

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3.2. The total amount of grants awarded in any one financial year will not exceed the sum allocated in that year budget for disbursement as grants.

3.3. The Town Council will normally expect to distribute grants to a variety of organisations. This may mean a smaller amount is awarded than that requested.

3.4. The Council will normally only fund up to a maximum of 50% of a project cost.

3.5. Grants will not be awarded to cover costs that have already been incurred.

4. ELIGIBLE PARTIES

4.1. Grants can be applied for by:

(a) Not-for- profit groups operating for the benefit of the community in Sandown.

(b) Groups set up for charitable purposes,

(c) Groups of people, not necessarily constituted who have specifically come together to run a project.

(d) A new group being set up. For new groups information will be required on:

- Why the group is being started the group and how it will be continued
- If there is any support from people wanting to join or run the group
- How it has been established there is a need for the proposed activity or project.

(e) Applications from religious groups will be considered where a clear benefit to the wider community can be demonstrated, irrespective of their religious beliefs.

(f) Applications from health, education or social services will be considered where there are benefits to the wider community and the project is in addition to statutory services.

(g) Grants may only be awarded to branches of regional or national organisations which clearly demonstrate how the funding is to be used to specifically benefit the people of Sandown.

5. INELIGIBLE PARTIES

5.1. Sandown Town Council is prevented by law from giving financial assistance to individuals.

5.2. Sandown Town Council will not provide a grant to aid commercial organisations which aim to generate a profit.

6. ELIGIBLE PROJECTS OR ACTIVITIES

6.1. Grants will be awarded, at the discretion of the Sandown Town Council, to organisations and projects which provide or improve:

(a) Safety

(b) Recreation

(c) Community pride

(d) Sports

(e) Art, culture or heritage

(f) Services for children and young adults

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(g) Services for the elderly

(h) Services for people with disabilities or;

(i) Other projects or services which the Council considers will be of benefit to the local community or Sandown's residents.

7. IN-ELIGIBLE PROJECTS OR ACTIVITIES

7.1. Grants will not be awarded for projects or activities that:

(a) Are statutory responsibilities.

(b) Could reasonably be expected to be funded from other sources.

(c) Could reasonably be expected to be funded from membership subscriptions.

(d) Are political in nature.

(e) Seek to promote or oppose a a religious viewpoint or activity.

(f) Seek to fund professional services.

(g) Seek to fund salary, routine or other administration costs.

7.2. Grants cannot be awarded in relation to church buildings and other property owned by religious institutions.

8. APPLICATIONS

8.1. Applications are accepted at any time throughout the year but will not be considered until the next meeting of council.

8.2. Applications are considered in accordance with the policy and criteria set out above.

8.3. Grant applications will only be considered if:

8.3.1. Submitted using Sandown Town Councils Grant Application Form

Form A – Lower-Level Grants
Grant applications up to and including £200

Form B – Upper-Level Grants
Grant applications in excess of £500

8.3.2. Supported with all requested/relevant documentation.

8.3.3. All the questions on the application form are answered as fully as possible to provide a detailed picture of the proposed project or of the activities and of your organisation within the town.

8.4. Amounts over £500 will be given only in exceptional circumstances. If you feel you may have a special case, please discuss this with the Clerk in the first instance.

8.5. Grants applications should be submitted at least 14 days before the next meeting of council or will be considered at the following meeting.

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9. CONSIDERATION OF APPLICATIONS

9.1. The council will consider if funding requested is commensurate to the benefit obtained by the residents of Sandown, including:

(a) How well the grant will meet the needs of the community.

(b) How effectively the grant will be used by the applicant.

(c) If the costs are reasonable and expected contributions that have been or are being raised locally are realistic.

(d) If the applicant could reasonably have been expected to obtain sufficient funding from a more appropriate source

(e) The constitution and management of the applicant.

9.2. The council reserved the right to seek additional information in relation to the application and the applicant including undertaking checks and balances.

9.3. Groups working with young people and/or vulnerable adults are required to have protection policies in place staff must have been subject to the required safeguarding checks.

9.4. Applicants will need to demonstrate that they have adequate public liability or other insurance for the planned activity or project.

9.5. If funding has previously been awarded for the same project or activity, the Council must be satisfied that the project or service was delivered to a satisfactory level.

10. AWARD OF GRANTS

10.1. Applicants will be informed of the decision on their grant application within two weeks of council considering the application.

10.2. Grant awards will by preference be paid by bank transfer into the bank account of the organisation. Payments will not usually be made to individuals, with the exception of the lower level grants where the organisation does not have/intend to have a bank account for the organisation can satisfy the Council that monies will be and have been appropriately spent.

10.3. The grant can only be awarded to the value approved by council.

11. GRANT AWARD CONDITIONS

11.1. Grant awards are made subject to the following conditions:

11.1.1. The grant award must be used for the purpose detailed in the application.

11.1.2. Monies must be used within one year of award. The council recognises that project timescales can slip for valid reasons. In such circumstances, the council expects to be informed of any issues.

11.1.3. If a project does not ultimately proceed as planned, grant monies will be returned.

11.1.4. Proof of purchase will be made available to the council if an award relates to a specific item.

11.1.5. The applicant will provide to the council all such assistance as is reasonably necessary to enable the council to comply with its requirements under the freedom of information action.

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11.1.6. The applicant will acknowledge the contribution made by the council when arranging promotional activity or literature including press releases relating to the application.

12. REPAYMENT OF GRANTS

12.1. Sandown Town Council will require repayment of monies if the applicant is unable to use the award for the stated purpose.

12.2. The council reserves the right to recover the grant and/or moveable equipment purchased with grant monies if:

- The organisation to which the grant was awarded ceases to exist
- The grant is not used for the purposes specified, or the applicant does not comply with the conditions of the grant.

12.3. Should dishonesty be found in relation to the application or spending the grant, the matter will be reported to the police and the Council will press for prosecution.

13. DATA PROTECTION

13.1. By submitting the application form, you give permission for Sandown Town Council to use the information that you provide for purposed including but not limited to:

- Establishing entitlement to a grant; and
- Inclusion in the council's records, including those which by law must be published.

13.2. Sandown Town Council aims to make the grant making and assessment process as open and clear as possible. Therefore, meetings are held in public and individual applications may be discussed in front of the public and press.

13.3. In certain circumstances the council recognises this is not appropriate and consideration is given to what information it would be appropriate to reveal, recognising the need to maintain the confidentiality of vulnerable groups and individuals, and their details will not be made public in any way, except as required by law.

13.4. If you think your application falls within this category, please notify the clerk on application.

14. CONTACT DETAILS

RFO: Jennifer Armstrong
The Broadway Centre,
1 Broadway,
Sandown,
Isle of Wight
PO36 9GG

Tel: (01983) 408 287/ 300 329

Email: rfo@sandowntowncouncil.gov.uk

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SANDOWN TOWN COUNCIL

Grant Application - Form A

Lower Level Grants - Up To £200

Please complete this form as clearly as possible. You may continue onto additional sheets, if necessary, but please indicate where you are doing so and ensure they are securely fastened to this form on submission. Please refer to our grant policy, before completion of this form.

Applicant Details

A1. Name of Club/Organisation

Please give the name of your organisation as it appears on your constitution or set of rules if you have them.

A2. Name of Contact

This should be the main contact in respect of this application.

A3. Address

This should be the address of the organisation or the main address for correspondence.

A4. Additional Contact Details

Please provide daytime contact details for your organisation.

Phone:
Mobile:
Email:

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A5. Club/Organisation Description

Briefly describe your organisation's activities/intended activities. Please include your aims and objectives and tell us how long your club/organisation has been in existence. If you are recently formed, please state that and whether your application relates to a one off project or a longer/ongoing activity.

A6. Link to the Sandown Community

Briefly explain how your organisation is linked to Sandown and supports its community.

A7. Membership (if you have one) - number of individuals involved in the organisation/activities.

Total Membership:	Adults:	Children:
Sandown Residents Membership:	Adults:	Children:

A8. Registered charity no (if applicable)

No:	Not Applicable:

A9. VAT Registered

No:	Not Applicable:

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Grant Details

B1. Description

Please briefly describe the project, scheme or service for which this grant is intended. Only applications for specific projects will be considered. Expenses linked to the day to day running of an organisation will not be funded.

B2. Grant Beneficiaries

Please indicate which sections of the community will benefit from your project.

B3. Timeline

Please indicate when the project will start. Grant funds will not be released earlier than 3 month before the start of the project. This also applies to events.

Funding Details

C1. Total Cost

Please use the table below to provide an estimated breakdown of the expenditure for which this grant is being applied.

Item	**Cost**
Total	

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C2. Additional Funding

Please give details (including amounts and dates) of all other sources of funding you have secured for what this grant is going towards. This may include funding received from other bodies applied to for grant aid, own funds that will be contributed towards the project and contributions in kind received for this purpose. Sandown Town Council will usually not fund more than 50% of a project.

C3. Previous Applications

If your organisation has previously applied for a grant from Sandown Town Council, please provide the grant ID and details of the grant and what it was used for.

Additional Information

D1. Additional Information

Please use this section to provide us with any further information you feel is important to the consideration of your claim.

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Declaration

I certify that, to the best of my knowledge, all the information I have given in this application is correct and understand that any grant awarded and used for any other purpose than that detailed in this application or unused within 6 months must be returned in full to Sandown Town Council as set out in the Application Guidelines.

Signed Date of Application

Name (in capitals)

Position in Club/Organisation

Please return completed forms to:

Town Clerk
Sandown Town Council
The Broadway Centre
S1 Broadway
Sandown
IW
PO36 9GG

Email signed forms to: rfo@sandowntowncouncil.gov.uk

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SANDOWN TOWN COUNCIL

Grant Application - Form B

Upper Level Grants - Over £200

Please complete this form as clearly as possible. You may continue onto additional sheets, if necessary, but please indicate where you are doing so and ensure they are securely fastened to this form on submission. Please refer to our grant policy, before completion of this form.

Applicant Details

A1. Name of Club/Organisation

Please give the name of your organisation as it appears on your constitution or set of rules if you have them.

A2. Name of Contact

This should be the main contact in respect of this application.

A3. Address

This should be the address of the organisation or the main address for correspondence.

A4. Additional Contact Details

Please provide daytime contact details for your organisation.

Phone:
Mobile:
Email:

A5. Club/Organisation Description

Briefly describe your organisation's activities/intended activities. Please include your aims and objectives and tell us how long your club/organisation has been in existence. If you are recently formed, please state that and whether your application relates to a one off project or a longer/ongoing activity.

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A6. Link to the Sandown Community

Briefly explain how your organisation is linked to Sandown and supports its community.

A7. Membership (if you have one) - number of individuals involved in the organisation/activities.

Total Membership:	Adults:	Children:
Sandown Residents Membership:	Adults:	Children:

A8. Registered charity no (if applicable)

No:	Not Applicable:

A9. VAT Registered

No:	Not Applicable:

Grant Details

B1. Description

Please briefly describe the project, scheme or service for which this grant is intended. Only applications for specific projects will be considered. Expenses linked to the day to day running of an organisation will not be funded.

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B2. Grant Beneficiaries

Please indicate which sections of the community will benefit from your project.

B3. Timeline

Please indicate when the project will start. Grant funds will not be released earlier than 3 month before the start of the project. This also applies to events.

Funding Details

C1. Total Cost

Please use the table below to provide an estimated breakdown of the expenditure for which this grant is being applied.

Item	**Cost**
Total	

C2. Additional Funding

Please give details (including amounts and dates) of all other sources of funding you have secured for what this grant is going towards. This may include funding received from other bodies applied to for grant aid, own funds that will be contributed towards the project and contributions in kind received for this purpose. Sandown Town Council will usually not fund more than 50% of a project.

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C3. Previous Applications

If your organisation has previously applied for a grant from Sandown Town Council, please provide the grant ID and details of the grant and what it was used for.

Additional Information

D1. Additional Information

Please use this section to provide us with any further information you feel is important to the consideration of your claim.

D2. Checklist

In order to consider your claim for a small grant the following materials must be submitted to Sandown Town Council with this completed form:

- A copy of your club/organisation's constitution or set of rules
- A copy of your bank statement and recent accounts
- A copy of any quotations as specified in section C1

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Declaration

I certify that, to the best of my knowledge, all the information I have given in this application is correct and understand that any grant awarded and used for any other purpose than that detailed in this application or unused within 6 months must be returned in full to Sandown Town Council as set out in the Application Guidelines.

Signed Date of Application

Name (in capitals)

Position in Club/Organisation

Please return completed forms to:

Town Clerk
Sandown Town Council
The Broadway Centre
S1 Broadway
Sandown
IW
PO36 9GG

Email signed forms to: rfo@sandowntowncouncil.gov.uk

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SANDOWN TOWN COUNCIL

Information Technology Policy

APPROVAL DATE:
REVIEW DATE:
MINUTE NUMBER:

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1. INTRODUCTION

1.1. Sandown Town Council has a duty to ensure the proper security and privacy of its computer systems and data. All users have some responsibility for protecting these assets. The Town Clerk is responsible for the implementation and monitoring of this policy but may delegate that responsibility to another officer.

2. GENERAL PRINCIPLES

2.1. All employees, members and other users should be aware of the increasingly sophisticated scams and risks posed to cybersecurity and when in any doubt should seek guidance from the Town Clerk.

2.2. As a general rule, users will never be asked to share passwords by email and users should be aware of odd language used in emails which may indicate a fraudulent email.

2.3. All employees, members and other users of council IT equipment must be familiar with and abide by the regulations set out in the council's 'Data Protection Policy'.

2.4. All council devices run windows defender. This must not be switched off for any reason without the authorisation of the Town Clerk. Individuals must ensure all recommended windows updates are installed in a timely manner.

2.5. All users are reminded that deliberate unauthorised use, alteration, or interference with computer systems, software or data is a breach of this policy and in some circumstances may be a criminal offence under the Computer Misuse Act 1990.

2.6. All software installed on council devices must be fully licensed and no software should be installed without authorisation from the Town Clerk

3. EMPLOYEES

3.1. All employees will be assigned a council email address as appropriate.

3.2. Volunteers may also be assigned a council e-mail address where necessary.

3.3. Personal use of Council IT equipment is permitted but should be kept to a minimum during working hours.

3.4. Reasonable use of the internet during working hours is permitted.

3.5. The council reserves the right to monitor all activity on company devices. This includes activity, email activity and internet usage for the purposes of ensuring compliance with our policies and procedures and of ensuring compliance with the relevant regulatory requirements.

3.6. Information acquired through such monitoring may be used as evidence in disciplinary proceedings. Monitoring usage will mean processing personal data.

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4. MEMBERS

4.1. All members will be provided with a council e-mail address and must use this for all council business

4.2. Members are reminded that any e-mail sent or received in their capacity as a Town Councillor is Council data and any e-mails may have to be disclosed following requests under the Data Protection Act or Freedom of Information Act. This includes e-mails on Personal Accounts when acting as a Councillor

4.3. A copy of all e-mail received on the councillor e-mail accounts is kept on the server in line with the council's Data Protection Policy.

4.4. A copy of all e-mail sent from councillor e-mail accounts on the webmail is kept on the server; it is recommended that members not using webmail to access e-mail should set up a rule to ensure a copy of e-mail is kept on the server.

4.5. Members using social media in their capacity as councillors must make it clear they are speaking in a personal capacity and not representing the view of the council.

4.6. Members should ensure they are adhering to the Council's Code of Conduct when using social media.

4.7. Members must ensure that any personal devices used to access council systems (including email, websites and data) are password protected and access is restricted solely to the member.

5. WEBSITES AND SOCIAL MEDIA

5.1. Officers shall ensure that any websites operated by the council are regularly reviewed to ensure content is accurate and up-to-date. Websites shall also be monitored for unauthorised access and abuse.

5.2. Council social media accounts will be operated by officers.

5.3. The Town Mayor's official social media accounts may also be operated by the Mayor.

5.4. All council social media messages must be non-political, uncontroversial and used to promote/highlight the Town.

5.5. Approval must be obtained from the Town Clerk prior to the creation of any council websites or social media accounts.

6. PASSWORD PROTECTION

6.1. All council computers and systems must be password protected to prevent unauthorised access.

6.2. Users should ensure that unattended devices are password protected and lock screen engaged when leaving their device unattended.

6.3. Where possible Passwords must confirm to the following criteria:

a) Minimum eight characters

b) Comprise of at least three random words

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c) Include at least one upper case letter and one number

6.4. Where possible, generic user accounts should be avoided.

6.5. Where users have unique access permissions and/or accounts for systems, these must not be shared with other users

6.6. Different passwords should be used for different devices and accounts.

6.7. Passwords should be routinely changed.

6.8. Passwords should not be written down or left in unsecure locations.

7. PORTABLE DEVICES

7.1. All portable devices (including tablets and mobile phones) must be protected to prevent unauthorised access. This can be by use of passwords, passcodes or other biometric measures as applicable.

7.2. Passcodes must be appropriate for the device and the level of risk that unauthorised access poses to the organisation; where devices can access council data or other systems, passcodes must be unique and not easily guessable.

7.3. Particular care must be taken when using removable media to transmit data as such media are easily lost or intercepted. Any sensitive information (including personal data, confidential documents or data which could impact on the rights or reputation of any person or organisation including the council) placed on removable media must be suitably password protected or encrypted.

8. INCIDENT REPORTING

8.1. All members, employees or volunteers must report any incidents which could pose a risk to the council's systems or data security to the Town Clerk without delay.

8.2. This includes but is not limited to:

a) Lost devices

b) Potential risk arising from phishing emails/websites

c) Passwords having been shared

9. MISUSE OF IT

9.1. IT systems will be monitored for misuse and all misuse is prohibited.

9.2. Misuse includes, but is not limited to:

a) Creation or transmission of any offensive, obscene or indecent images, data or other material or any data capable of being resolved into obscene or indecent images or material

b) Creation of material which is designed or likely to cause annoyance, inconvenience or needless anxiety.

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c) Creation or transmission of defamatory material

d) Transmission of material which in anyway infringes the copyright of another person

e) Transmission of unsolicited commercial advertising material to networks belonging to other organisations

f) Deliberate actions or activities with any of the following characteristics:

   (i) Wasting staff effort or networked resources

   (ii) Corrupting or destroying another users' data

   (iii) Violating the privacy of other users

   (iv) Disrupting the work of other users

   (v) Other misuse of the networked resources by the deliberate introduction of viruses/malware

   (vi) Playing games during working hours

   (vii) Altering the set up or operating perimeters of any computer equipment without authority.

   (viii) Unauthorised access, use, destruction, modification and/or distribution of council information, systems or data is prohibited

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Sandown Town Council Medium Term Financial Strategy

This strategy is an overarching medium term financial strategy that the Council will follow when making financially relevant decisions.

1. Value for Money.

   The Council will always seek to obtain best value for money in all its financially relevant decisions (this does not necessarily mean accepting the lowest tender in any contract.

2. Maintaining its assets

   The Council will budget monies to provide anticipated maintenance cost for all the facilities the Council runs (2021, 2022 & 2023 budget decision).

3. Replacement of facilities and equipment

   The Council will make financial provision for the replacement of facilities and equipment. Money will be budgeted and placed in council reserves for the replacement of facilities/equipment the council operates, based on an anticipated life of the facility/equipment (2021, 2022 & 2023 budget decision).

4. Reserves.

   (i) The Councill will hold a minimum of 6 months of net revenue expenditure in general reserves[1].

   (ii) Monies allocated to the above provision (6 above) to be ringfenced for that provision and detailed in the Council budget reserves. Monies may, exceptionally, be vired from these reserves by a Council decision.

5. Broadway Centre.

   The Broadway is a community asset, and whilst hire charges to users will defray running costs, it is not expected to be run as profit centre. Hire charges will be reviewed and adjusted, if necessary, on an annual basis.

6. Public Toilets.

   The Council will look to offset running cost of its various facilities by charging a reasonable charge (not necessarily to make a profit/cover running costs).

7. Grant Funding.

   The Council will look to obtain grant funding at all opportunities.

8. Inflationary Budget Increases.

   The Council will budget to deal with inflationary increases in running costs so that it does not cut services (2021, 2022 & 2023 budget decision).

9. Investments:

   See Reserves and Investments policy.

[1] As outlined by the Joint Panel on Accountability and Governance Practitioners Guide 2022 sections 5.32 – 5.34.

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SANDOWN TOWN COUNCIL

Reserves and Investments

APPROVAL DATE:
REVIEW DATE: May 2027
MINUTE NUMBER:

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1. INTRODUCTION AND RELEVANT GUIDANCE

1.1. This policy has been policy has been developed in accordance with:

1.1.1. Statutory Guidance on Local Government Investments (3rd Edition) issued under section 15 (1)(a) of the Local Government Act 2003 and effective for financial years commencing on or after 1 April 2018

1.1.2. The Treasury Management Code issued by CIPFA – "Treasury Management in the Public Services: Code of Practice and Cross-Sectoral Guidance Notes, 2017 Edition".

1.1.3. Joint Panel on Accountability and Governance (JPAG) Practitioner's Guide – March 2022 edition.

1.2. The key principles of the guidance are transparency and democratic accountability.

1.3. The guidance is statutory for parish councils, providing their total investments exceed or are expected to exceed £100,000 at any time during the financial year.

1.4. Council should approve its Investment Strategy at least annually before the start of the financial year.

1.5. The guidance states that local authorities who hold treasury management investments should apply the principles set out in the CIPFA Treasury Management Code.

1.6. There are 3 key principles within section 4 of the Code which are:

1.6.1. The Council should put in place formal and comprehensive objectives, policies and practices, strategies and reporting arrangements for the effective management and control of their treasury management activities.

1.6.2. Policies and practices should make clear that the effective management and control of risk are prime objectives of their treasury management activities and that responsibility for these lies clearly within their organisations.

1.6.3. Their appetite for risk should form part of their annual strategy, including any use of financial instruments for the prudent management of those risks, and should ensure that priority is given to security and portfolio liquidity when investing treasury management funds.

1.7. The Council should acknowledge that the pursuit of value for money in treasury management, and the use of suitable performance measures, are valid and important tools for responsible organisations to employ in support of their business and service objectives; and that within the context of risk management, their treasury management policies and practices should reflect this.

2. USE OF INDICATORS

2.1. The guidance states that where authorities are holding treasury management investments for more than 12 months, they should include quantitative indicators that allow Councillors and the public to assess a local authority's total risk exposure as a result of its investment decisions.

2.2. The authority should consider the most appropriate indicators to use, given their risk appetite and capital and investment strategies. The indicators used should be consistent from year to year and should be presented in a way that allows elected members and the

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general public to understand a local authorities' total risk exposure from treasury management and other types of investment.

2.3. Where a local authority has entered into a long term investment or has taken out long term debt to finance an investment, the indicators used should allow Councillors and the general public to assess the risks and opportunities of the investment over both it's payback period and over the repayment period of any debt taken out.

3. RESERVES POLICY

3.1. The Town Council will only maintain reserves for the following reasons:

General (non-earmarked) Reserve

3.1.1. A General (non-earmarked) Reserve will be maintained to provide a contingency for unforeseen circumstances. A sum approximately equal to 25% - 50%, depending on financial circumstances, of it's Net Revenue Expenditure will be maintained.

Capital Reserve

3.1.2. A Capital Reserve will be built up to meet any needs identified in its Medium-Term Financial Forecasts or for unexpected expenditure or emergencies.

Earmarked Reserves

3.1.3. Other Reserves which are earmarked for special purposes or future development, or to meet commitments, will be maintained as necessary.

4. INVESTMENT STRATEGY 2022

4.1. The Town Council acknowledges the importance of prudently investing the surplus funds held on behalf of the community.

4.2. The guidance states that the Council's Investment Strategy should be publicly available on a local authority's website.

Definitions of treasury management activities

4.3. The Council defines its treasury management activities as:

4.3.1. The management of the Council's cash flows, its banking and money market transactions, the effective control of the risks associated with those activities, and the pursuit of best value performance consistent with those risks.

4.3.2. The Town Council holds investments for treasury management purposes. The contribution that these investments make to the objectives of the Town Council is to support effective treasury management activities.

4.3.3. Yields that are generated from financial investments will be added to the councils income on a regular basis to contribute towards the future needs identified in the capital program.

4.3.4. This strategy establishes formal objectives, policies and practices and reporting arrangements for the effective management and control of the Council's treasury management activities and the associated risks.

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Investment Policy Investment objectives

4.4. A prudent investment policy has two underlying objectives:

4.4.1. Security (protecting the capital sum from loss)

4.4.2. Liquidity (keeping the money readily available for expenditure when needed)

4.5. Once proper levels of security and liquidity are determined it will then be reasonable to consider a third objective, what level of yield can be obtained consistent with the first two objectives.

Investment Priorities

4.6. The Town Council's investment priorities therefore are:

- the security of its reserves, and
- the adequate liquidity of its investments, and
- the return (yield) on investment - the Council will aim to achieve the optimum return on its investments commensurate with proper levels of security and liquidity.

4.7. All investments of money under the control of the Council shall be in the name of Sandown Town Council.

4.8. The Department for Communities and Local Government maintains that the borrowing of money purely to invest or to lend and make a return is unlawful and the Council will not engage in such activity.

4.9. Where external investment managers are used they will be contractually required to comply with the Strategy.

Security

4.10. In order to diversify an investment portfolio largely invested in cash, investments will be placed with a range of approved financial institutions to minimise risk.

4.11. Financial investments can fall into one of three categories:

Specified Investments

4.11.1. Specified investments are those offering high security and high liquidity.

4.11.2. All investments will be made in sterling.

4.11.3. Specified investments are not long term, the local authority has contractual right to repayment within 12 months.

4.11.4. The investment is made with a body or in an investment scheme described as high quality or will one of the following bodies:

- The United Kingdom Government
- A local authority in England or Wales (as defined in section 23 of the 2003 Act) for a similar body in Scotland or Northern Ireland; or
- A parish council or community council.

4.11.5. The Council will only invest in institutions of high credit quality – based on information from approved credit rating agencies (Moody's Investors Service Ltd, Fitch Ratings Ltd or Standard and Poor's).

4.11.6. High credit quality is defined as a body or investment scheme with an 'A' or P1 rating.

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4.11.7. The Town Council will assess the risk of loss before entering into, and whilst holding, an investment and will monitor the risk of loss on investments by review of credit ratings on a quarterly basis.

Loans

4.11.8. The guidance states that a local authority may choose to make loans to local enterprises, local charities, wholly owned companies and joint ventures as part of a wider strategy for local economic growth even though those loans may not all be seen as prudent if adopting a narrow definition of prioritising security and liquidity.

4.11.9. There are specific conditions that the local authority must be able to demonstrate in order to undertake this type of investment and the guidance contains a detailed explanation.

4.11.10. The Town Council will not participate in such investments in FY 2026/27.

Other Non-Specified Investments

4.11.11. Non-Specified Investments are those which are not a loan, nor does it meet the criteria to be treated as a specified investment. Examples may be long term investments (longer than 12 months) and investment in stocks and shares.

4.11.12. Given the unpredictability and uncertainty surrounding investments in stocks and shares, The Town Council will not participate in such investments.

Liquidity

4.11.13. The Council's policy on liquidity states that only short-term investments will be held. The Town Clerk/RFO and Chairman of Finance Committee will determine the maximum period for which funds may prudently be invested, so as not to compromise liquidity.

4.11.14. The Town Council's policy will include short-term investments (no longer than 12 months) and ensure liquidity.

4.11.15. The Town Council will invest through its bank where appropriate by a series of linked accounts which allow transfer of money not immediately required to successfully higher interest investment.

Reporting

4.11.16. The Council will report on the return on investments within the annually produced Investment Position Statement as an indicator of investment performance.

4.11.17. At the end of the financial year, the Town Clerk/RFO will provide a report on the performance of the Council's investments and an Investment Position Statement to full council at their first meeting of the new financial year.

4.11.18. Within the annually produced Investment Position Statement, the Council will report on:

- Return on investments as an indicator of investment performance
- Debt to net revenue expenditure (gross debt as a percentage of net revenue expenditure, where net revenue expenditure is a proxy for the size and financial strength of a local authority)

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5. REVIEW

5.1. The Council shall be able to amend or make variations to this document at any time following consideration of recommendations from the Town Clerk/RFO

5.2. A local authority should prepare at least one Investment Strategy which needs to contain the disclosures and reporting requirements specified in the guidance.

5.3. The Strategy should be approved by the full Council.

5.4. The Secretary of State recommends that the Strategy should be presented for approval prior to the start of the financial year.

5.5. Where a local authority proposes to make a material change to its Investment Strategy during the year a revised Strategy should be presented to full council or equivalent for approval before the change is implemented Treasury Management Advice.

5.6. The Town Council recognises that neither members or officers are experts in the field of treasury management. As such, the Council should:

- review it's level of investment on an annual basis and assess if there is a requirement to obtain independent, external, expert 'Treasury Management' advice in reviewing the Investment Strategy and the allocations of Specified Investments.
- Treasury Management advice may potentially be sourced from the principal local authority or a specialist treasury management advisory firms who specialises in local authority and local town and parish councils.

5.7. On this basis, this document will be reviewed annually by the Council prior to the start of the financial year.

6. BANKING ARRANGEMENTS

6.1. The Council will periodically review its banking arrangements by a competitive process which balances returns, high street presence, accessibility of funds, service level, bank charges and ethical credentials

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SANDOWN TOWN COUNCIL

Written Dispensations Procedure

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Approval Date:
Minute Number:
Review Date: May 2027

1. INTRODUCTION

1.1 Town Councils are now responsible for determining requests for a dispensation by a Town councillor under Section 33 of Localism Act 2011.

1.2 This is because they are a "relevant authority" under section 27(6) (d) of the Act.

1.3 This guide explains:

(a) the purpose and effect of dispensations

(b) the procedure for requesting dispensations

(c) the criteria which are applied in determining dispensation requests

(d) the terms of dispensations.

2. PURPOSE AND EFFECT OF DISPENSATIONS

2.1 In certain circumstances Councillors may be granted a dispensation which enables them to take part in Council business where this would otherwise be prohibited because they have a Disclosable Pecuniary Interest.

2.2 Provided Councillors act within the terms of their dispensation there is deemed to be no breach of the Code of Conduct or the law.

2.3 Section 31(4) of the Localism Act states that dispensations may allow the Councillor:

(a) to participate, or participate further, in any discussion of the matter at the meeting(s); and/or

(b) to participate in any vote, or further vote, taken on the matter at the meeting(s).

2.4 If a dispensation is granted, the Councillor may remain in the room where the meeting considering the business is being held.

2.5 **Please note: If a Town councillor participates in a meeting where he/she has a Disclosable Pecuniary Interest and he/she does not have a dispensation, they may be committing a criminal offence under s34 Localism Act 2011.**

3. PROCESS FOR MAKING REQUESTS

3.1 Any Councillor who wishes to apply for a dispensation must fully complete a Dispensation Request form and submit it to the proper officer of the town council (ie. the town clerk)

3.2 As soon as possible before the meeting which the dispensation is required. Applications may also be made at the town council meeting itself (if town councils have a standing item on the agenda to deal with dispensation requests) and the nature of the interest has only become apparent.

3.3 A request for dispensation must be made on an individual basis.

4. CONSIDERATION BY THE TOWN COUNCIL

4.1 The Town Council can either delegate to the Town clerk the authority to grant dispensations or reserve such decisions for the full town council. Sandown Town Council's standing orders delegate authority to the Proper Office (S.O 6.4-5).

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4.2 The Town clerk or the Town council may grant a dispensation to a councillor who has a Disclosable Pecuniary Interest to participate in any discussion of a matter at a meeting and/or to participate in any vote on the matter (as per para. 2 above) if they consider that:

(a) so many members of the decision-making body have disclosable pecuniary interests that it would impede the transaction of the business (ie. the meeting would be inquorate); or

(b) the authority considers that the dispensation is in the interests of persons living in the authority's area; or

(c) it is otherwise appropriate to grant a dispensation.

4.3 The Town council may wish to extend the provisions of the above paragraph to apply in the same way in the case of a "non-disclosable pecuniary interest" or a "non-pecuniary interest", as defined in the Code of Conduct, but this is at the discretion of the council.

4.4 The terms of any dispensation shall be in accordance with Paragraph 6.

4.5 The Town clerk or Town council should formally notify the Councillor of their decision and reasons in writing at the earliest opportunity and in any event within 5 working days of the decision.

5. CRITERIA FOR DETERMINATION OF REQUESTS

5.1 In reaching a decision on a request for a dispensation the parish council or the parish clerk (as appropriate) will take into account:

(a) the nature of the Councillor's prejudicial interest

(b) the need to maintain public confidence in the conduct of the Council's business

(c) the possible outcome of the proposed vote

(d) the need for efficient and effective conduct of the Council's business

(e) any other relevant circumstances.

6. TERMS OF DISPENSATIONS

6.1 Dispensations may be granted:

(a) for one meeting; or

(b) for a period not exceeding 4 years.

7. DISCLOSURE OF DECISION

7.1 Any Councillor who has been granted a dispensation must declare the nature and existence of the dispensation before the commencement of any business to which it relates.

7.2 A copy of the dispensation will be kept with the Register of Councillors' Interests.

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Sandown Town Council Dispensation Request Form

Your name:	
The business for which you require a dispensation (refer to agenda item number if appropriate)	
Details of your interest in that business	
Date of meeting or time period (up to 4 years) for which dispensation is sought.	
Dispensation requested to participate, or participate further, in any discussion of that business by that body.	
Full reasons why you consider a dispensation is necessary (use a continuation sheet if necessary)	
Signed	
Dated	
Please send your completed form to the Town Clerk . You will receive written notification of the Proper Officer's decision within 5 working days of the decision	

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Received by Proper Officer:	
Date Received	
Decision	Granted / Not Granted
If granted reason for dispensation.	(a) the nature of the Councillor's prejudicial interest (b) the need to maintain public confidence in the conduct of the Council's business (c) the possible outcome of the proposed vote (d) the need for efficient and effective conduct of the Council's business (e) any other relevant circumstances.
Term of Dispensation	(a) for one meeting; or (b) for a period not exceeding 4 years. And (c) to participate, or participate further, in any discussion of the matter at the meeting(s); and/or (d) to participate in any vote, or further vote, taken on the matter at the meeting(s).
Other Notes	
Date Councillor Informed:	

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