

TOWN HALL Market Square Crewkerne Somerset **TA187LN**

towncouncil@crewkerne-tc.gov.uk

01460 74001

Councillors are hereby summoned, and members of the public and press are invited, to attend a meeting of the Policy & Resources Committee to be held on Monday 13 October 2025, following the meeting of the Planning & Highways Committee, and not commencing before 19.00, in the Beech Suite, George Reynolds Centre, South Street, Crewkerne for the purpose of transacting the business outlined on the agenda below.

Notes:

- Members of the public can access the meeting which will be uploaded via the following link: https://www.youtube.com/channel/UCTA9K-7L4Onjcli2Gtz7tCg.
- Members of the public requiring assistance or reasonable adjustments to aid their attendance at council meetings are asked to contact the Council Offices in advance using the above contact details. Documents are available in large print by request.
- Assistive listening devices are available at public meetings please see a member of staff prior to the start of the meeting.
- Recording of meetings is permitted under the Openness of Local Government Bodies Regulations 2014; please refer to the Council's Policy on Audio/Visual Recording & Photography at Meetings (Recording-Meetings-policy-Feb-2022.pdf (crewkerne-tc.gov.uk).
- Public participation is welcome during the allocated Public Open Forum session, please refer to Section 3 of the Council's Standing Orders (Standing-Orders-May-2024.pdf (crewkerne-tc.gov.uk).

Gemma Hughes, Town Clerk (signed on original) 7 October 2025

Agenda

010/2526

To receive and approve apologies for absence.

a. To record members present:

Schedule 12 of the Local Government Act 1972 requires:

- a record be kept of the members in attendance.
- this record forms part of the minutes of the meeting.
- Members who are unable attend a meeting should tender apologies in advance to the Town Clerk and the grounds for apologies tendered will also be recorded.

b. To approve any apologies for absence:

Section 85(1) of the Local Government Act 1972 requires:

Members present to decide if the reason(s) for a member's absence are acceptable.

011/2526

To receive declarations of pecuniary or personal interests in items on the agenda and any dispensations.

The Localism Act 2011 and the Council's Code of Conduct requires:

- Members to declare any interests not currently recorded in the Member's Register of Interests or not notified to the Monitoring Officer of it.
- Requests for Dispensations should be made in writing to the Clerk in advance of the meeting.

012/2526

To approve the draft minutes of the Policy & Resources Committee meeting held on 9 June 2025.

013/2526

Public Open Forum: Questions may be put to the Council in person during this public participation session of up to 15 minutes and a maximum of 3 minutes per person. Issues notified to the Clerk a minimum of 3 working days before the meeting (i.e., by 5pm on the LOCAL COUNCIL AWARD SCHEME QUALITY preceding Wednesday) will receive a response during this session. Issues

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raised in this session without prior notice may be referred to the Clerk to respond to within 10 working days or listed on a subsequent agenda. The Chair reserves the right to vary or extend these time limits.

014/2526 Terms and Conditions: To adopt updated terms and condition for hirers of the GRC and Victoria Hall

015/2526 New policies:

To adopt a Volunteer Management Policy and Agreement Form

016/2526 Review of Existing Policies and Terms of Reference (proposed changes in red):

a. CCTV Policy

b. Social Media Policy

c. Investment and Borrowing Management Policy

d. Open Spaces Management Policy

e. Time Off In Lieu (TOIL) Policy and to incorporate this into the Staff Handbook

f. Child and Vulnerable Persons

g. Data Protection Policy

h. Joint Burial Committee Terms of Reference

017/2526 Policy Review Schedule: to note the updated policy review schedule.

To receive Matters of Report (verbal reports for information only).

Next meeting: Monday 12 January 2026, following the Planning and Highways Committee, Council Chamber, Town Hall.

In accordance with the Public Bodies (Admission to Meetings) Act 1960 s 1(2), to resolve that the press and member of the public be excluded from following items having regard to the confidential issues to be discussed.

Confidential Session: Exclusion of the Press & Public – Contractual, staffing and commercially sensitive information.

O20/2526 Annual Hire Charges: To review the annual hire charges

021/2526 Sports Clubs Charges: To review the annual charges for the sports clubs use of the GRC

O22/2526 PRS/PPL Charges: To review the annual charges





Conditions for the hire of the George Reynolds Centre (GRC)

THIS IS A NO SMOKING BUILDING: SMOKING IS NOT PERMITTED ANYWHERE ON THE PREMISES

All references to the Council are to Crewkerne Town Council unless otherwise specified.

The term 'Hire' includes where the use of the GRC or part thereof is used with or without charge.

- 1) All applications for the hire of the GRC must be made on the official booking form and forwarded on completion to the Council.
- 2) The person by whom the booking form is signed shall be considered the hirer and must be over 18 years of age. Where an organisation is named on the application form, that organisation shall also be considered the hirer and shall be jointly and severally liable hereon with the person who signs the form, as will anyone else who appears to the Council that they exercise control of the event/activity whether or not they are named as an organiser.
- 3) At least one person suitably qualified to supervise persons under 18 years must be in attendance during all activities where the hiring organisation is a youth group. The hirer shall carry out a risk assessment to determine the number of suitably qualified persons for each session.
- 4) The Council shall have the right to refuse any application for the hire of the GRC or part thereof.
- 5) All hires are subject to the Council's current appropriate cancellation charge(s), regardless of when hired; refer to separate Hire Charge sheet for details.
- 6) The hirer must provide a copy of their Public Liability Insurance (PLI) for any hire which is open to the public to attend, at least 7 days before the hire takes place unless otherwise agreed with an officer of the Council. The acceptance of a copy of the public liability insurance, does not mean that the Council has the expertise to determine whether the level of cover or its content is adequate for the needs of the hirer; this can only be determined by the hirer. The Council does not accept any liability (except where imposed by legislation) for any losses whether it/they are incurred either directly or indirectly as a result of this cover; where it is imposed by legislation, the hirer must indemnify the Council against such losses unless the loss is caused by the negligence of the Council. Where an officer of the Council has decided that the hirer is not required to provide PLI in their name, if they employ any contractors (DJ, caterer(s) etc.) a copy of their PLI must be provided. For the sake of clarity, the term 'employ' in this context includes where the provision of a DJ, caterer(s) etc. is made with or without payment. No booking will be confirmed until such time as these copies are provided to an officer of the Council.
- 7) No copyright dramatic or musical work shall be performed or sung without the licence of the owner of the copyright and all such licences shall be produced to an officer of the Council before the commencement of the hiring. Should the hirer wish to play **ANY** music at all in **ANY** format during the event/activity, this must be stated on the application form as authorisation may be required from the Performing Rights Society/Phonographic Performance Ltd or their successor in title. The hirer shall indemnify the Council against any infringement of copyright which may occur during the hiring.

- 8) The hirer shall not carry out or permit fly posting or any other form of unauthorised advertising for any event taking place at the premises and shall indemnify the Council accordingly against all actions, claims and proceedings arising from any breach of this condition.
- 9) It will be the responsibility of the hirer to ensure that, any event they wish to hold in the hall, complies with the appropriate legislation under the Gambling Act 2005 and that any licence or other form of authorisation required under this Act, is obtained prior to the event from Somerset Council or the Gambling Commission depending on the type of authorisation required; a copy shall be supplied to an officer of the Council at least 7 days before the hire takes place; the licence/authorisation may be subject to redaction. Please contact the Council for further details.
- 10) Any hire of the GRC or part thereof does not entitle the hirer to use or enter the premises at any time other than the specific hours for which the GRC is hired, unless prior arrangement has been made with the Clerk and payment made where applicable.
- 11) The hire of part of the GRC shall not entitle the hirer or any of their members/guests etc. to use any other part of the GRC which is subject to a hire fee unless agreed otherwise in writing with the Clerk. The hirer shall put robust measures in place to ensure that this does not occur. Failure to comply is likely to result in an additional fee being levied and may mean no further bookings will be taken from the hirer.
- 12) The hirer shall not sub-let the GRC or any part thereof unless by prior arrangement with the Clerk.
- 13) The hirer is responsible for all losses caused by damage(s) to the hired part of the GRC and for any property contained within during the period of hire. The hirer is also responsible for any losses caused during the period of hire to any other part of the GRC except where the damage(s) is/are caused by another hirer using another part of the premises or a communal area at the same time. Where a bond is payable, the Council reserves the right to deduct from such a bond, the cost of repair or reasonable replacement. Where the cost exceeds the amount of the bond, or a bond was not payable, the hirer shall be responsible for paying the difference/cost to the Council; this shall be paid no later than 30 days after notification by the Council of the outstanding amount. Interest at 2% above the base rate may be payable if 30 days are exceeded.
- 14) The activation of the fire alarm (except in an emergency) will result in the forfeit of the £100 bond.
- 15) Where a bond is payable, this shall be paid together with the hire charge (where appropriate) at the time of booking unless otherwise agreed with the Clerk.
- 16) The Council shall not be responsible for any loss or damage to any property arising out of the hiring which may be incurred by or be done by any person or persons resorting to the hall during the hiring arising from any cause whatsoever or for any loss due to any breakdown or machinery failure or supply of electricity, leakage of water, fire, Government restriction or Act of God which may cause the hall to be temporarily closed or the hiring to be interrupted or cancelled; and the hirer shall indemnify the owner against any claim which may arise out of the hiring in respect of any such loss or damage. Hirers leave their property on the premises at their own risk.
- 17) The Council shall not be responsible for death or personal injury to persons resorting to the hall arising from any cause whatsoever except where this is caused by the negligence of the Council or is prescribed in legislation.
- 18) No nails, screws or other like objects shall be driven into any part of the GRC, nor shall any placards, streamers or other articles be fixed thereto. Where any fastenings such as adhesive putty or other adhesive mediums are used, should the fabric of the premises (including paintwork) be damaged, the hirer shall be responsible for all rectification works/costs.
- 19) The hirer shall pay special attention to ensuring that neither they nor anyone else present at any time during the hiring cause any damage to the wooden flooring this includes damage caused by moving tables and

- chairs or any other object(s) or causing anything to mark, scuff, scratch, penetrate or otherwise damage the floor howsoever caused. The hirer shall be responsible for rectification/costs of said damage.
- 20) No flags, emblems or other decorations shall be displayed outside any part of the GRC without the prior written consent of the Council.
- 21) In the event of a lift breakdown, the hirer shall ensure that any passengers inside the lift are aware that they need to set off the alarm which will call a nominated person to release them.
- 22) The hirer shall also be responsible for ensuring the safe evacuation of wheelchair users, the elderly or frail in the event of a fire or lift breakdown. An evacuation chair, available for this purpose, is kept in the wheelchair refuge at the rear of the hall. False activation of the lift alarm will result in the forfeit of the bond.
- 23) The right of entry to the GRC is reserved to the Clerk and any member or other agent of the Council and any police officer or authorised officer of any other regulatory body at any time during the hiring. The arrival and departure of guests will be regularly monitored by the hirer to ensure the prevention of noise nuisance to the public especially where this exceeds 9pm. The hirer shall be responsible that good order is kept in the GRC during the hiring. The Council reserves the right to put a stop to any entertainment, activity or meeting not properly conducted or prohibited by law.
- 24) All hirers of the GRC for the purposes of Discos or similar musical events and other events using amplified sound, will be responsible for notifying the local police that such an event is to take place. All windows must remain closed after 9pm for any such events and any evidence that windows are opened After this time, will result in the forfeit of the bond.
- 25) Where any licensable activities take place at the GRC, they MUST be authorised under the Licensing Act 2003; the hirer shall be responsible for obtaining the appropriate authorisation from Somerset Council and for adhering to the following conditions:
 - a) All persons involved in the sale of alcohol at the premises will be fully trained on their responsibilities in relation to the sale of alcohol, particularly in regard to preventing the sale of alcohol to intoxicated or underage persons. Records of this training shall be made available to the Council, Somerset Council, Trading Standards and Police upon request.
 - b) Where any part of the GRC is booked for an 18th or 21st Birthday or a Prom (celebratory gathering of young people predominately under the age of 22 years) there shall be a minimum of two Security Industry Authority (SIA) appropriately registered persons present at the premises from the start of the event to 15 minutes after the event finishing.
 - c) Where any alcohol is supplied during the period of hire (including where it being sold or given away without charge or there is a requirement to do something or refrain from doing something in order to obtain the alcohol, or it is included in the price of a ticket or donations towards the cost are requested) the following conditions shall apply unless otherwise agreed in writing with the Town Clerk:
 - All persons under 16 years of age shall be accompanied by at least one responsible adult.
 - ii) No responsible adult can supervise more than 4 persons under 16 years of age.
 - iii) A responsible adult shall be at least 25 years of age
 - iv) Except where the alcohol is supplied under a club premises certificate, the hirer shall ensure that a personal licence holder supervises all supplies of alcohol during the period of hire.
 - d) A Challenge 25 proof of age policy shall operate at the premises at all times where alcohol is supplied/provided; this shall be read in conjunction with the paragraph above.

- e) Prior to the commencement of the hire, the hirer shall be responsible for providing a written copy of the Challenge 25 policy to all persons involved in the provision of alcohol whether they are paid or unpaid. The policy MUST contain information on intoxication, proxy sales etc.
- f) No glassware or crockery shall be taken on to any terraced/balcony area; any drinks whether alcoholic or otherwise shall be decanted into suitable recycled paper/plastic receptacles.
- g) The hirer shall complete a risk assessment to determine the number of SIA registered persons that shall be on duty for each public opening and any other event where an officer of the Council has determined that there is potential for damage to property and/or injury to any person. It is the hirer's responsibility to ensure that that the risk assessment is carried out by a person with competence in this area. The Council does not accept any liability howsoever arising for any consequences which may arise from this risk assessment.
- 26) The use of smoke effects by individuals for discos or parties is prohibited because the smoke activates the fire alarm system. Any such use shall result in the forfeiture of the bond and/or any other associated costs incurred by the Council
- 27) The hirer will be responsible for ensuring that any electrical equipment used on the premises is in good working order and has current PAT certification.
- 28) Hire of the kitchen is by separate arrangement charged at the rate prevailing at the time of the booking. The hirer will be responsible for all crockery, cutlery and other kitchen items used and for ensuring they are left in a clean and undamaged condition; should this not be the case; the hirer shall be responsible for any associated cleaning costs. The term 'Other kitchen items' include but is not limited to kettles, urns, oven, microwave, fridge, freezer, dishwasher, table and countertops.
- 29) The hirer shall at the expiration of the period of hire leave the premises or hired part thereof, in a clean and orderly state, remove all rubbish and food waste from the building and put tables and chairs back as found. Should Council find prior to the next hiring of this part of the GRC, that compliance with this condition is not to its satisfaction, the cost of rectification shall be borne by the hirer.
- 30) The hirer shall be responsible for ensuring at the termination of the hire that ALL DOORS AND WINDOWS ARE SECURELY LOCKED AND THAT ALL LIGHTS and air conditioning ARE TURNED OFF in the hired part or parts of the GRC (this includes locking the front door unless the hire terminates before that of another hirer) Should the hirer fail to lock the doors and/or windows and this failure results in damage to the GRC or any property contained within, the hirer shall be responsible for ALL rectification and replacement costs.
- 31) The hirer shall be responsible for the collection and prompt return of the key(s) where this is not a regular booking. The key(s) will be available for collection between the hours of 9 a.m. and 3.00 p.m. on the day of the hire or during the same hours on a Friday if the hire is at the weekend. The key(s) must be returned the following morning between the same hours; if this is a weekend, the key(s) must be posted through the letter box of side door of Town Hall together with the document containing the alarm code unless otherwise instructed by an officer of the Council.
- 32) Under NO circumstances shall the hirer cause or cause anyone else to duplicate any keys or codes to Council property. Should any key or code be lost, stolen or become unusable, the hirer shall notify the Council in writing within 24 hours if a weekday or 72 hours if a weekend, of the occurrence taking place. The key(s)/code(s) remain the property of the Council. The hirer remains responsible for any damage or injury or death that may arise either directly or indirectly as a result of said duplication, loss, theft or damage so must ensure that they take every reasonable step to prevent this from occurring.
- 33) Property of the hirer and the hirer's agent must be removed before 12 noon of the day following the period of hire or fees may be charged for each day or part of a day until the same is removed. The Council does not accept any responsibility for any property left on the premises after the hiring and reserves the right to

dispose of said property after 14 days from date of hire. In the case of bazaars, jumble sales and any other occasion when property is brought into the premises for sale, all property must be taken away or a charge for its removal and disposal will be deducted from the bond.

IMPORTANT NOTES

<u>Please Note: The sale of alcohol and all entertainment must cease at midnight or beforehand and the building must be vacated no later than 30 minutes later.</u>

EMERGENCY KEYHOLDERS:

DURING OFFICE HOURS: Town Council 01460 74001

OUTSIDE OFFICE HOURS: Cllr. Mike Best





Conditions for the hire of the Victoria Hall

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The term 'Hire' includes where the use of the of the Victoria Hall is used with or without charge.

- 1) All applications for the hire of the Victoria Hall must be on the official booking form and forwarded on completion to the Council.
- 2) The person by whom the booking form is signed shall be considered the hirer and must be over 18 years of age. Where an organisation is named, that organisation shall be considered the hirer and shall be jointly and severally liable hereon with the person who signs the form as will anyone else who appears to the Council that they exercise control of the event/activity whether or not they are named as an organiser.
- 3) At least one person suitably qualified to supervise persons under 18 years must be in attendance during all activities where the hiring organisation is a youth group or has youth members. The hirer shall carry out a risk assessment to determine the number of suitably qualified persons for each session.
- 4) The Council shall have the right to refuse any application for the hire of the Victoria Hall.
- 5) All hires are subject to the Council's current appropriate cancellation charge(s), regardless of when hired; refer to separate Hire Charge sheet for details.
- 6) The hirer must provide a copy of their Public Liability Insurance (PLI) for any hire which is open to the public to attend, at least 7 days before the hire takes place unless otherwise agreed with an officer of the Council. The acceptance of a copy of the public liability insurance, does not mean that the Council has the expertise to determine whether the level of cover or its content is adequate for the needs of the hirer; this can only be determined by the hirer. The Council does not accept any liability (except where imposed by legislation) for any losses whether it/they are incurred either directly or indirectly as a result of this cover; where it is imposed by legislation, the hirer must indemnify the Council against such losses unless the loss is caused by the negligence of the Council. Where an officer of the Council has decided that the hirer is not required to provide PLI in their name, if they employ any contractors (DJ, caterer(s) etc.) a copy of their PLI must be provided. For the sake of clarity, the term 'employ' in this context includes where the provision of a DJ, caterer(s) etc. is made with or without payment. No booking will be confirmed until such time as these copies are provided to an officer of the Council.
- 7) No copyright dramatic or musical work shall be performed or sung without the licence of the owner of the copyright and all such licences shall be produced to an officer of the Council before the commencement of the hiring. Should the hirer wish to play **ANY** music at all in **ANY** format during the event/activity, this must be stated on the application form as authorisation may be required from the Performing Rights Society/Phonographic Performance Ltd or their successor in title. The hirer shall indemnify the Council against any infringement of copyright which may occur during the hiring.

- 8) The hirer shall not carry out or permit fly posting or any other form of unauthorised advertising for any event taking place at the premises and shall indemnify the Council accordingly against all actions, claims and proceedings arising from any breach of this condition.
- 9) It will be the responsibility of the hirer to ensure that, any event they wish to hold in the hall, complies with the appropriate legislation under the Gambling Act 2005 and that any licence or other form of authorisation required under this Act, is obtained prior to the event from Somerset Council or the Gambling Commission depending on the type of authorisation required; a copy shall be supplied to an officer of the Council at least 7 days before the hire takes place; the licence/authorisation may be subject to redaction. Please contact the Council for further details.
- 10) Any hire of the Victoria Hall does not entitle the hirer to use or enter the premises at any time other than the specific hours for which the hall is hired, unless prior arrangement has been made with the Clerk and payment made where applicable.
- 11) The hirer must not cause or permit anyone else to cause any vehicle to be driven or moved onto or park on the paved forecourt, unless the Council have agreed prior to the commencement of the hire that exceptional circumstances apply.
- 12) The hirer shall not sub-let the hall or any part thereof unless by prior arrangement with the Clerk.
- 13) The hirer is responsible for all damage to the Victoria Hall and to any property contained within during the period of hire. Where a bond is payable, the Council reserves the right to deduct from such a bond, the cost of repair or reasonable replacement. Where the cost exceeds the amount of the bond, or a bond was not payable, the hirer shall be responsible for paying the difference/cost to the Council; this shall be paid no later than 30 days after notification by the Council of the outstanding amount. Interest at 2% above the base rate may be payable if 30 days are exceeded.
- 14) Activation of the fire door alarms (except in an emergency) will result in the forfeit of the £100 bond.
- 15) Where a bond is payable, this shall be paid together with the hire charge (where appropriate) at the time of booking unless otherwise agreed with the Clerk.
- 16) The Council shall not be responsible for any loss or damage to any property arising out of the hiring which may be incurred by or be done by any person or persons resorting to the Victoria Hall during the hiring arising from any cause whatsoever or for any loss due to any breakdown or machinery failure or supply of electricity, leakage of water, fire, Government restriction or Act of God which may cause the hall to be temporarily closed or the hiring to be interrupted or cancelled; and the hirer shall indemnify the owner against any claim which may arise out of the hiring in respect of any such loss or damage. Hirers leave their property on the premises at their own risk.
- 17) The Council shall not be responsible for death or personal injury to persons resorting to the Victoria Hall arising from any cause whatsoever, except where this is caused by the negligence of the Council or is prescribed in legislation.
- 18) No nails, screws or other like objects shall be driven into any part of the Victoria Hall, nor shall any placards, streamers or other articles be fixed thereto. Where any fastenings such as adhesive putty or other adhesive mediums are used, should the fabric of the premises (including paintwork) be damaged, the hirer shall be responsible for all rectification works/costs.
- 19) The hirer shall pay special attention to ensuring that neither they nor anyone else present at any time during the hiring cause any damage to the wooden floor this includes moving tables and chairs or any other object(s) or causing anything to mark, scuff, scratch, penetrate or otherwise damage the floor howsoever caused. The hirer shall be responsible for rectification/costs of said damage.

- 20) No flags, emblems or other decorations shall be displayed outside the Victoria Hall without the consent of the Council.
- 21) In the event of a lift breakdown passengers inside the lift should set off the alarm which will call a nominated person to release them, but the hirer shall be responsible for ensuring the safe evacuation of wheelchair users, the elderly or frail in this event. An evacuation chair, available for this purpose, is kept in the wheelchair refuge at the rear of the hall. False activation of the lift alarm will result in the forfeit of the bond.
- 22) In the event of a fire the lift must not be used, and wheelchair users should be directed to the refuge at the back of the hall where they will be safely taken from the building via the rear fire exit.
- 23) The hirer shall ensure that they and anyone attending their function do not access any part of the Victoria Hall, to which they have not been given permission to do so.
- 24) The right of entry to the Victoria Hall is reserved to the Clerk and any member, officer or other agent of the Council, and any police officer or authorised officer of any other regulatory body at any time during the hiring. The hirer shall be responsible that good order is kept in the hall during the hiring. The Council reserves the right to put a stop to any entertainment, activity or meeting not properly conducted or prohibited by law.
- 25) The hirer is responsible for regularly monitoring the arrival and departure of guests and for ensuring that all windows in the Victoria Hall are shut after 9pm when Live and/or Recorded music is playing/being performed to ensure the prevention of noise nuisance to the public.
- 26) All hirers of the Victoria Hall for the purposes of Discos or similar musical events and other events using amplified sound, will be responsible for notifying the local police that such an event is to take place. The amplifiers shall be connected to the red electric sockets upon the stage. This is a sound monitoring system which will cut out if the volume of the music exceeds the preset limits. All windows must remain closed during such events and any evidence that windows are opened will result in the forfeit of the bond.
- 27) The Victoria Hall is a Licensed Premises, and all bars will be run the Designated Premises Supervisor (DPS). Whether alcohol is to be sold or provided free of charge the DPS retains the right to refuse permission. There may, however, be circumstances under which the hirer will be requested by the Council to submit a Temporary Event Notice (TEN) to Somerset Council in which case a redacted copy of the notice must be supplied to the Council prior to the date of the hire. Please contact the Council for further information on what information may be redacted
- 28) Where any other licensable activities take place at the Victoria Hall, they MUST be authorised under the Licensing Act 2003; the hirer may also be responsible for obtaining a Temporary Event Notice from Somerset Council for these too, please contact the Council for further information.
- 29) The hirer is responsible for adhering to the following conditions:
 - i) Where the Victoria Hall is booked for an 18th or 21st Birthday or a Prom (celebratory gathering of young people predominately under the age of 22 years) there shall be a minimum of two Security Industry Authority (SIA) appropriately registered persons present at the premises from the start of the event to 15 minutes after the event finishing.
 - ii) Where any alcohol is supplied during the period of hire (including where it being sold or given away without charge or there is a requirement to do something or refrain from doing something in order to obtain the alcohol, or it is included in the price of a ticket or donations towards the cost are requested) the following conditions shall apply unless otherwise agreed in writing with the Town Clerk:
 - (1) All persons under 16 years of age shall be accompanied by at least one responsible adult.
 - (2) No responsible adult can supervise more than 4 persons under 16 years of age.

- (3) A responsible adult shall be at least 25 years of age
- (4) the hirer shall ensure that a personal licence holder supervises all supplies of alcohol during the period of hire.
- iii) A Challenge 25 proof of age policy shall operate at the premises at all times where alcohol is supplied/provided; this shall be read in conjunction with the paragraph above.
- iv) Prior to the commencement of the hire, the hirer shall be responsible for providing a written copy of the Challenge 25 policy to all persons involved in the provision of alcohol whether they are paid or unpaid. The policy MUST contain information on intoxication, proxy sales etc.
- v) No drinks whether alcoholic or otherwise shall be taken out of the Victoria Hall.
- vi) The hirer shall complete a risk assessment to determine the number of SIA registered persons that shall be on duty for each public opening and any other event where an officer of the Council has determined that there is potential for damage to property and/or injury to any person. It is the hirer's responsibility to ensure that that the risk assessment is carried out by a person with competence in this area. The Council does not accept any liability howsoever arising for any consequences which may arise from this risk assessment.
- b) The use of smoke effects by individuals for discos or parties is prohibited because the smoke activates the fire alarm system. Any such use shall result in the forfeiture of the bond and/or any other associated costs incurred by the Council.
- 30) The hirer will be responsible for ensuring that any electrical equipment used on the premises is in good working order and has current PAT certification.
- 31) Hire of the kitchen is by separate arrangement charged at the rate prevailing at the time of the booking. The hirer will be responsible for all crockery, cutlery and other kitchen items used and for ensuring they are left in a clean and undamaged condition; should this not be the case; the hirer shall be responsible for any associated cleaning costs. Other kitchen items include but are not limited to kettles, urns, oven, microwave, fridge, freezer, dishwasher, table and countertops.
- 32) The hirer shall at the expiration of the period of hire leave the premises in a clean and orderly state, remove all rubbish and food waste from the building and put tables and chairs back as found. Should Council find prior to the next hiring of the premises, that compliance with this condition is not to its satisfaction, the cost of rectification shall be borne by the hirer.
- 33) The hirer shall be responsible for ensuring at the termination of the hire that ALL DOORS AND WINDOWS ARE SECURELY CLOSED/LOCKED AND THAT ALL LIGHTS and air conditioning ARE TURNED OFF (this includes ensuring the front door is locked upon leaving the premises. Should the hirer fail to lock the doors and/or secure the windows, and this failure results in damage to the Victoria Hall, or any property contained within, the hirer shall be responsible for ALL rectification and replacement costs.
- 34) The hirer shall be responsible for the collection and prompt return of the key(s) The key(s) will be available for collection between the hours of 9 a.m. and 3.00 p.m. on the day of the hire or during the same hours on a Friday if the hire is at the weekend. Key(s) must be returned by the following morning between the same hours; if this is a weekend the key(s) must be posted through the letter box of side door of Town Hall unless otherwise instructed by an officer of the Council.
- 35) Under NO circumstances shall the hirer cause or cause anyone else to duplicate any keys to Victoria Hall. Should any key be lost, stolen, or become unusable, the hirer shall notify the Council in writing within 24 hours if a weekday or 72 hours if a weekend, of the occurrence taking place. The key(s) remain the property of the Council. The hirer remains responsible for any damage or injury or death that may arise either directly

- or indirectly as a result of said duplication, loss, theft, or damage so must ensure that they take every reasonable step to prevent this from occurring.
- 36) Property of the hirer and the hirer's agent must be removed before 12 noon of the day following the period of hire or fees may be charged for each day or part of a day until the same is removed. The Council does not accept any responsibility for any property left on the premises after the hiring and reserves the right to dispose of said property after 14 days from date of hire. In the case of bazaars, jumble sales and any other occasion when property is brought into the premises for sale, all property must be taken away or a charge for its removal and disposal will be deducted from the bond.

IMPORTANT NOTES

<u>Please Note: The sale of alcohol and all entertainment must cease at midnight or beforehand and the building must be vacated no later than 30 minutes later.</u>

EMERGENCY KEYHOLDERS:

DURING OFFICE HOURS: Town Council: 01460 74001

OUTSIDE OFFICE HOURS: Cllr. Kathy Head

Cllr. Mike Best





Volunteer Management Policy

1. Introduction

- 1.1 This policy supports Crewkerne Town Council's mission to foster a town with a strong sense of community pride, ensuring that volunteering is a safe, inclusive, and rewarding experience for all. The council recognises the valuable contribution that volunteers can make to the work it does in the community and how vital volunteers can be for projects and events to be successful.
- 1.2 The Council also recognises that volunteers are motivated, because it is their choice to volunteer and give their time freely. In return, the council wishes to provide volunteers with opportunities that will help them to develop new skills and experiences.
- 1.3 The aim of this policy is to ensure volunteers are safe and appreciated when volunteering with the council. It is designed to provide a framework for how the council will manage volunteers and what volunteers can expect from the council; it sets out the principles and practice by which the council will involve volunteers.
- 1.4 This policy applies to all volunteers undertaking work or duties on behalf of the council in a voluntary capacity. It does not apply to those who are directly employed or contracted by the council or to councillors. Volunteers are not employees and do not have a contract of employment with the Council. Nothing in this policy creates a legally binding relationship.
- 1.5 Officers may identify the opportunity for volunteering with the Council, but all volunteering opportunities must be approved by the Town Clerk in consultation with the Town Mayor.

2. Principles

- 2.1 All employees will be expected to work positively with any volunteers and, where appropriate, will actively seek to involve them in their work.
- 2.2 The Council aims to provide volunteers with satisfying roles and the opportunity for personal development. The Council seek to help volunteers meet these needs.
- 2.3 The Council will not introduce volunteers to replace paid staff.
- 2.4 For all volunteering roles, there will be an appointed volunteer coordinator who has responsibility for the volunteers. This will be identified in the volunteer agreement.
- 2.5 The Council is committed to providing equal opportunities for all volunteers, in line with the Equality Act 2010. No person will be discriminated against on the basis of protected characteristics, and the Council's Equality and Diversity Policy will apply.

3. Recruitment and Induction

3.1 The Council may recruit volunteers using a range of methods, including word of mouth, advertising, social media, talking with other organisations or engaging volunteers through another

organisation. It may also directly approach people who have previously volunteered with the council.

- 3.2 The Council will endeavour to help a volunteer overcome barriers which may make it difficult for them to volunteer.
- 3.3 Whilst not applicable for most volunteering opportunities with the Council, for certain voluntary roles prospective volunteers may be interviewed by the volunteer coordinator to assess their suitability. It may also be necessary to obtain references or a DBS check when the role involves children or vulnerable adults.
- 3.4 All volunteers will be asked to sign a volunteer agreement which details the role they wish to undertake, indicates agreement to the Council's relevant policies and sets out the commitment from the Council. This requirement may not be required where volunteers are working through a partner organisation which has a similar agreement in place for its volunteers. Signed agreements will be held securely by the Town Council in accordance with data protection legislation. Electronic copies will be stored on the Council's secure server, with access restricted to authorised staff only, and any paper copies will be kept in a locked cabinet within the Council offices.
- 3.5 All volunteers will receive an appropriate induction which will aim to:
 - Familiarise volunteers with the work of Crewkerne Town Council in general and in their specific area of work
 - Ensure volunteers are aware of the risk assessment and safety measures applicable to their work

4. Support, Involvement and Problem Solving

- 4.1 All volunteers will have a named person as their main point of contact.
- 4.2 Where appropriate (for example for ongoing volunteer work) volunteers will receive regular supervision to feedback on progress and discuss future development.
- 4.3 The Council may offer training and development opportunities where it helps fulfil the volunteer's role or where it is required for health and safety purposes or in compliance with law.
- 4.4 The Council will support networking meetings between volunteers to encourage peer support and share experiences.
- 4.5 The Council will invite volunteers to provide feedback on activity they are engaged in, including, but not limited to, the post-event evaluation of events and projects.
- 4.6 Volunteers are encouraged to express their views about matters concerning the Town Council, its facilities, services and events to the volunteer coordinator. The Council welcomes volunteers proactively providing feedback and making suggestions for how things may be done differently in future.
- 4.7 The Council wishes to identify and resolve any problems at the earliest possible stage and volunteers are encouraged to raise any grievance or complaint with their volunteer coordinator or the Town Clerk.

5. Health and Safety

- 5.1 The Council has responsibility for the health and safety of its volunteers and will undertake a risk assessment of all volunteering activities.
- 5.2 Volunteers must always follow the Council's health and safety policies and procedures; they have a duty of care to themselves and others who might be affected by their actions. Volunteers may also need to disclose any medical conditions which affect their ability to undertake certain activities.
- 5.3 The Council will inform volunteers of any specific health and safety measures which must be taken during a voluntary activity, and volunteers must wear any PPE as required.
- 5.4 Volunteers must report any accidents to the volunteer coordinator.
- 5.5 Volunteers are covered by the Council's insurance policies whilst undertaking official duties on behalf of the Council; cover is not provided for unauthorised actions or actions taken outside the volunteering agreement.
- 5.6 Where volunteers are engaged in roles involving children or vulnerable adults, safeguarding guidance will be provided. Volunteers must follow any safeguarding procedures adopted by the council and may be required to undergo DBS checks where appropriate.

6. Expenses

- Volunteers will be reimbursed for any out-of-pocket expenses incurred on behalf of the council where this has been approved in advance. Receipts must be provided.
- 6.2 With prior agreement of the Town Clerk, reasonable personal expenses may be reimbursed on a case-by-case basis to enable volunteers to overcome financial barriers to volunteering.

7. Recognition and Appreciation

- 7.1 The council greatly values the time, skills, and commitment that volunteers contribute to its work. Volunteers play an essential role in helping the council deliver services, projects and events for the benefit of the community.
- 7.2 The Council will recognise and appreciate volunteers in a range of ways, which may include:
 - Offering regular thanks and feedback from staff and councillors
 - Highlighting volunteer contributions in council communications, newsletters or social media (with consent)
 - Inviting volunteers to council events, celebrations or thank-you gatherings
 - Providing certificates of appreciation or letters of reference where appropriate
- 7.3 The council is committed to ensuring that all volunteers feel their contribution is valued, recognised and respected.

8. Volunteer Conduct

- 8.1 Volunteers represent the Council and whilst they are not employees there are certain expectations the council has for its volunteers. Volunteers are expected to:
 - undertake their volunteering duties to the best of their ability

- treat all volunteers, staff, contractors and members of the public fairly and courteously
- respect decisions taken by staff and follow all reasonable instructions
- follow safety procedures and wear any PPE provided
- wear appropriate clothing (including suitable footwear), provided identification (if required), and take necessary steps to protect themselves in the environment they are working in (e.g. protection from UV rays through the use of sunscreen and a hat)
- not behave in a way which could bring the council into disrepute
- return any equipment/clothing supplied at the end of their duties
- 8.2 Volunteers must comply with the Data Protection Act 2018 and UK GDPR. They will only access personal data required for their role and must not share any information outside of the Council unless legally required.
- 8.3 Volunteers may have access to personal data or sensitive information about the work of the Council, its volunteers and staff, clients or other organisations. In accordance with the Data Protection Act 2018 volunteers will only have access to personal or sensitive information they need to fulfil their specific role, and this shall be approved by the Town Clerk. There is an absolute requirement both during and after volunteering with the council to maintain confidentiality and not pass on information to any individual or third-party organisation unless required to do so by law.
- 8.4 Volunteers using the Council's computers/IT network will observe the council's IT policy and all volunteers are expected to observe the council's policies on Data Protection and Social Media use.

9. Right To Leave

9.1 The Council recognises that volunteers give their time freely and are under no obligation to give notice. However, it is greatly appreciated if volunteers can provide advance notice if they are either unable to attend their volunteer role or wish to end their volunteering arrangement with the Council.

Version Control:

Adopted at Policy & Resources Committee: 13th October 2025 Minute XXXXXX

This policy will be reviewed every four years, or sooner if required by changes in legislation or council practice.

Review Date: October 2029



Volunteer Agreement

This agreement sets out the mutual understanding between Crewkerne Town Council ("the Council") and the volunteer named below. It is not a contract of employment and does not create a legally binding relationship.

Volunteer Details
Name:
Role Title:
Start Date:
Appointed Volunteer Coordinator:
1. The Volunteer Role
The volunteer agrees to undertake the role of:
The main activities involved are:

2. The Council's Commitment

The Council will:

- Provide a safe and supportive environment in which to volunteer.
- Treat all volunteers fairly, with respect and in line with its Equality and Diversity Policy.
- Provide an induction and any necessary training to enable the volunteer to carry out their role safely and effectively.
- Ensure volunteers are covered by the Council's insurance when undertaking agreed activities.
- Reimburse agreed out-of-pocket expenses in line with the Volunteer Management Policy.
- Provide a named contact (the appointed Volunteer Coordinator) for support, supervision and problem-solving.

• Recognise and appreciate the volunteer's contribution.

3. The Volunteer's Commitment

The volunteer agrees to:

- Carry out their role to the best of their ability.
- Work in accordance with the Council's policies and procedures, including Health & Safety, Equality and Diversity, Data Protection and Safeguarding (where relevant).
- Treat councillors, staff, other volunteers and members of the public with respect and courtesy.
- Follow any reasonable instructions given by staff or the volunteer coordinator.
- Take care of equipment and return any items provided for the role.
- Provide as much notice as possible if unable to attend or if wishing to end their volunteering role.

4. Confidentiality and Data Protection

Volunteers may come into contact with personal or sensitive information. The volunteer agrees to handle such information in accordance with the Data Protection Act 2018 and UK GDPR, maintaining confidentiality both during and after their involvement with the Council.

5. Emergency Contact Details	
In case of emergency, please provide details of some	one the Council can contact:
Name:	
Relationship to Volunteer:	
Telephone Number(s):	
6. Agreement	
I have read and understood this agreement and agree under the terms set out above.	e to volunteer with Crewkerne Town Council
Signed (Volunteer):	Date:
Name:	
Signed (Volunteer Coordinator):	Date:
Name:	



CCTV Policy

1. Introduction

- 1.1 Crewkerne Town Council ('the Council') operates three CCTV systems, one providing surveillance within the Town Hall and the Local Information Centre, one at the George Reynolds Centre, and the other third, surveillance of various outside locations in the town centre.
- 1.2 This policy covers the management, operation and use of these CCTV systems and the associated data generated by the cameras and is in conformance with the Council's GDPR policy.

2. The Requirement for CCTV Surveillance

2.1 Town Hall CCTV System

Protection of Local Information Centre staff and volunteers and Town Council staff from unacceptable behaviour (verbal or physical abuse, intimidation or harassment) by members of the public who enter the building.

2.2 George Reynolds Centre CCTV System

Protection of GRC user groups, including Jigsaw staff and users, youth group, hirers, sports clubs volunteers and Town-Council staff from unacceptable behaviour (verbal or physical abuse, intimidation or harassment) by members of the public who enter the building.

2.3 <u>Town Centre CCTV System</u>

- To discourage all types of criminal activity in the town centre and help reduce the fear of crime.
- To provide the Police with evidential material in support of their investigations into criminal activity.
- To enhance community safety and promote greater use of town centre facilities.
- To promote and facilitate an active partnership between the Police, the Town
 Council, the local business community and local residents, for the discouragement
 of crime.
- 2.4 In accordance with Ref. 1, The Town-Council will regularly review these requirements and re-evaluate whether they continue to justify the need for a CCTV surveillance system is justified.

3 System Management

3.1 The Town Council are responsible for ensuring that the CCTV system and cameras are properly maintained. In support of this, the Council employs a specialist contractor to undertake regular system maintenance.

- 3.2 The Police, who are the users of the data, have a responsibility to alert the Council when they encounter problems with either the system or the cameras.
- 3.3 While the Police may assist by notifying the Council of any faults they encounter, ultimate responsibility for the operation, security and effectiveness of the CCTV systems rests with Crewkerne Town Council.

4 System Security

- 4.1 The CCTV control systems are contained within a secure room within the Town Hall building. Access to the CCTV control room is limited to the Police, the Town Clerk, the Deputy Clerk and the Town Councillors nominated as the Town Council representatives for the Crewkerne Community Safety Group.
- 4.2 All staff, Councillors and volunteers with access to CCTV data will receive appropriate training in data protection, confidentiality and the responsible handling of CCTV footage.

5 CCTV Data Recording and Access

- 5.1 Data from the CCTV cameras is continually recorded. As a result, old data is continually overwritten as fresh data is recorded. Recorded data is generally retained for approximately three months, depending on file sizes.
- 5.2 Access to the CCTV data is restricted to the Town Councillors nominated as the Town Council representatives for the Crewkerne Community Safety Group, the Town Clerk, Deputy Clerk and, by request, the Police.
- 5.3 Whenever the Police require data evidence to be taken from the CCTV recordings, an Evidence Form must be completed (see Appendix 1).
- 5.4 A log will be maintained of all instances where CCTV data is accessed, viewed, or shared. This log will include the date, time, reason for access, and the individual authorising the access.
- 5.5 Third-party access (for example, insurance companies, solicitors, or other organisations) is not permitted. Requests for data must be made through the Police, who may request the data directly in line with legal requirements.

6. Data Subject Rights

- 6.1 Under UK GDPR, individuals have the right to request access to personal data relating to them. If an individual believes they have been captured on CCTV operated by Crewkerne Town Council, they may submit a Subject Access Request (SAR) in writing to the Town Clerk. The Council will respond within one calendar month, in line with statutory requirements.
- Requests must include sufficient information to identify the individual and the relevant timeframe. The Council may require proof of identity before fulfilling a request.

6.3 Where fulfilling a request would infringe the rights of other individuals (e.g. third parties visible in the footage), the Council will take reasonable steps such as redaction or may refuse the request where appropriate under data protection legislation.

7. Data Breach Procedures

7.1 Any unauthorised access, loss or disclosure of CCTV data will be treated as a data breach. Crewkerne Town Council will follow its GDPR/Data Breach Policy, which includes investigating the breach, reporting it where required to the Information Commissioner's Office (ICO), and notifying affected individuals where appropriate.

8. Signage

- 8.1 In accordance with Ref.1, Signage is in place within the Town Hall, the GRC and in a number of locations around the town centre, to alert members of the public that surveillance cameras are in use.
- 8.2 Signage will include contact details for Crewkerne Town Council as the data controller.

9. References

- Information Commissioner's Office (ICO) ICO Data Protection Code of Practice for Surveillance Cameras and Personal Information, 2018 Practical guidance on how to use surveillance systems in compliance with data protection law.
- UK GDPR and Data Protection Act 2018 the core legislation underpinning data protection and CCTV use.
- Surveillance Camera Code of Practice (Home Office, 2013, updated 2021) provides statutory guidance for local authorities and other operators of surveillance camera systems.
- Freedom of Information Act 2000 useful to reference, since people sometimes mistakenly use FOI requests to try to obtain CCTV footage (it clarifies that such requests fall under data protection rules, not FOI).
- Human Rights Act 1998 (Article 8 Right to Privacy) helps show that the Council is mindful of balancing surveillance against individuals' rights.
- Local Government Association (LGA) guidance on CCTV and data protection optional, but demonstrates alignment with sector-specific best practice.

Version Control:

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This policy will be reviewed every four years, or sooner if required by changes in legislation or council practice.

Review Date: October 2029

Appendix 1



CREWKERNE TOWN COUNCIL

TOWN HALL MARKET SQUARE CREWKERNE SOMERSET TA18 7LN TEL: 01460 74001

email - towncouncil@crewkerne-tc.gov.uk

Town Clerk: Gemma Hughes

EVIDENCE FORM

Date evidence taken from CCTV:
Crime Number:
Date of Crime:
Times Evidence Covers:
Signed: Avon & Somerset Police:
Print:
Signed: Crewkerne Town Council:
D.C.





Social Media Policy

1. Introduction

- 1.1 The aim of this policy is to set out a Code of Practice to provide guidance to Town Councillors, Council staff and others who engage with the Council using online communications, collectively referred to as social media.
- 1.2 The Council will ensure that training is provided for members and officers in connection with this policy.
- 1.3 Social media is a collective term used to describe methods of publishing on the internet.
- 1.4 This policy covers all forms of social media and social networking sites which include (but are not limited to):
 - Crewkerne Town Council's website
 - Facebook, Twitter, Instagram, LinkedIn and other social networking sites
 - YouTube and other video clips and podcast sites
 - Blogs, discussion forums, message boards or comments on web-based articles
 - Email
 - 1.5 The use of social media does not replace existing forms of communication.

2. Scope

- 2.1 The principles of this policy apply to Town Councillors and Council staff and also applies to others communicating with the Town Council.
- 2.2 Members Councillors are strongly advised to use only the official Crewkerne Town Council email address provided for Town Council business and correspondence. Any account used for Town Council business and correspondence will be subject to any request under the Freedom of Information Act 2000. Members Councillors are responsible for ensuring the security of devices, apps and packages used and all devices should be password protected.
- 2.3 The policy sits alongside relevant existing policies which need to be taken into consideration.
- 2.4 The current Code of Conduct applies to online activity in the same way it does to other written or verbal communication. Online content should be objective, informative and accurate. Councillors should be aware that their public profile as an elected representative may mean that they are more likely to be perceived as acting in an official capacity when blogging or posting.

- 2.5 Individual Town Councillors and Council staff are responsible for what they post in a Council and personal capacity.
- 2.6 In the main, Councillors and Council staff have the same legal duties online as anyone else, but failure to comply with the law may have more serious consequences.

3. Official Accounts

- 3.1 Any official social media account representing Crewkerne Town Council may only be created with the prior consent of the Council.
- 3.2 Only those expressly authorised by the Clerk may post content, respond to comments, or otherwise manage official Council accounts.
- 3.3 Login details and access permissions for all official accounts must be held securely by the Clerk.
- 3.4 No unofficial accounts may use Crewkerne Town Council's name, logo, or branding.

4 Guidance for using social media

- 4.1 Social media provides an opportunity for the Crewkerne Town Council to communicate quickly and positively with the community, to celebrate local achievements, and to strengthen civic pride.
- 4.2 All posts must be approved by the Clerk or a designated officer before publication where practical.
- 4.3 Social media may be used to:
 - Distribute agendas, post minutes and dates of meetings
 - Advertise events and activities
 - Promote good news stories with a linked website or press page
 - Advertise job vacancies
 - Retweet or share information from partner agencies such as Principal Authorities,
 Police, Library, Health etc.
 - Announce new information
 - Post or share information from other Town Council related community groups such as schools, sports clubs, community groups and charities
 - Refer resident queries to the clerk and all other Councillors
 - Share any other information that is relevant to the community
 - Use community engagement tools such as polls, questionnaires and competitions
- 4.4 When using social media (including email) Town Councillors and Council staff must be mindful of the information they post in both a personal and Council capacity and keep the tone of any comments respectful and informative.
- 4.5 Online content should be accurate, objective, balanced and informative.

- 4.6 Town Councillors and Council staff must not:
 - Hide their identity using false names or pseudonyms
 - Present personal opinions as that of the Town Council
 - Present themselves in a way that might cause embarrassment to the Council
 - Post content that is contrary to the democratic decisions of the Town-Council
 - Post controversial or potentially inflammatory remarks
 - Engage in personal attacks, online fights and hostile communications
 - Use an individual's name unless given written permission to do so
 - Publish photographs or videos of minors without parental permission
 - Disclose any commercially sensitive, personal or confidential information
 - Post any information that infringes copyright of others
 - Post any information that may be deemed libel
 - Post online activity that constitutes bullying or harassment
 - Bring the Town Council into disrepute, including through content posted in a personal capacity
 - Post offensive language relating to race, sexuality, disability, gender, age, religion or belief
 - Conduct any online activity that violates laws, regulations or that constitutes a criminal offence
- 4.7 Councillors' views posted in any capacity in advance of matters to be debated by the Council at a Council or committee meeting may constitute predisposition, predetermination or bias and may require the individual to declare an interest at Council meetings.

5 Monitoring use of social media

- 5.1 Anyone with concerns regarding any content placed on social media sites should report them to the Town Clerk.
- 5.2 Misuse of social media content can in certain circumstances constitute a criminal offence or otherwise give rise to legal action against you or the Council.
- 5.3 The Town Clerk acts as the moderator of the Town Council's social media output and is responsible for monitoring content to ensure it complies with the Social Media Policy.
- 5.4 Passwords for all official accounts must be reviewed regularly and changed if staff or councillors with access leave their role.
- 5.5 The moderator will have authority to remove any posts made by third parties from Council social media pages which are deemed to be of a defamatory or libellous nature. Where appropriate, the moderator will have the authority to report any such posting to any other appropriate agency including the Police and Somerset County Council's Safeguarding Unit.
- 5.6 A response is not always necessary.
- 5.7 The moderator has the right to restrict individuals from commenting or ban them from the Council's social media platforms.

5.8 All Council social media accounts in use should be checked on a regular basis to ensure the security settings are in place.

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This policy will be reviewed every four years, or sooner if required by changes in legislation or council practice.

Review Date: October 2029



Investment and Borrowing Management Policy

1. Introduction

- 1.1 This document policy gives guidance on borrowing and investments by Crewkerne Town Council in accordance with the Guidance on Local Government Investments ('the Guidance'), issued under s15(1) of the Local Government Act 2003, effective from 2018. It demonstrates highlights that the Council's commitment is committed to prudent Treasury Management to ensure that:
 - Capital expenditure plans are affordable;
 - All external borrowing and other long-term liabilities are within prudent and sustainable levels; and
 - Treasury Management decisions are taken in accordance with good professional practice.
- 1.2 The CIPFA Treasury Management Code of Practice defines Treasury Management as: 'The management of the Council's cashflows, its banking, money market and capital market transactions; the effective control of the risks associated with those activities; and the pursuit of optimum performance consistent with those risks'.

2. Investment Strategy

- 2.1 Crewkerne Town Council acknowledges the importance of prudently investing surplus funds held on behalf of the community.
- 2.2 Investment Strategies approved after 1 April 2018 must be in line with the Government's Statutory Guidance on Local Government Investments, which includes considerable detail on the provision of loans.
- 2.3 All investments will be made in line with the Council's financial procedures and observations and advice received from the Council's internal and/or external auditors.

3. Investment Objectives

- 3.1 In accordance with Section 15(1) of the 2003 Act, the Council will have regard to:
 - a) Such guidance as the Secretary of State may issue, and
 - b) To such other guidance as the Secretary of State may by regulations specify.

Crewkerne Town Council's investment objectives:

• The Council's investment priorities are the Security of reserves and adequate liquidity of its investments

- The Council will aim to maximise Maximising income from its investments commensurate with proper appropriate levels of security and liquidity
- The Council will seek to ensure that Ensuring investment income is reasonably consistent one year to year the next.
- Where external investment managers are used, they will be contractually obliged to comply with this strategy
- 3.2 All investments will be made in sterling. although consideration may be given to Investments in property and/or land may be considered where appropriate. The Council will not borrow money The Department for Communities and Local Government maintains that borrowing of monies purely to invest, or to lend and make a for financial return, as this is unlawful. and this Council will not engage in such activity.

4. Specified Investments

- 4.1 Specified Investments are those offering high security and high liquidity, made in sterling and mature within 12 months. with a maturing date of no more than a year. Such short-term investments made with the UK Government or a local authority or town parish council will automatically be Specified Investments.
- 4.2 For the prudent management of its treasury balances, maintaining sufficient levels of security and liquidity, the Council will use:
 - Deposits with banks, building societies, local authorities or other public authorities.
 - Other Recognised public sector funds specifically targeted funds. at the Public Sector.
- 4.3 The choice of institution and length of deposit will be at the discretion of The Responsible Financial Officer (RFO), in consultation with the Chair of the Policy and Resources Committee, will determine the choice of institution and deposit length. Investments may be spread across providers to minimise risk. Current investments are held is with Lloyds Bank and CCLA (Churches, Charities and Local Authorities Investment Management Limited).

Where appropriate, investments will be spread over different providers to minimise risk.

5. Non-Specified Investments

- 5.1 These investments have greater potential risk examples include investment in the money market, stocks and shares.
- 5.2 Given the unpredictability and uncertainties surrounding such investments, the Council will not use this type of investment.

6. Liquidity of Investments

- 6.1 The Responsible Finance Officer (RFO) will determine the maximum commitment periods to maintain adequate liquidity. for which funds may prudently be committed so as not to compromise liquidity.
- 6.2 Investments will be regarded as commencing on the date the commitment to invest is entered into, rather than the date on which the funds are paid over to the counterparty.

7. Long Term Investments

7.1 Long-term investments are defined in the Guidance as greater than 36 months. The Council does not currently hold any long-term investments and will only consider them if they are consistent with this policy, prudent risk management, and statutory guidance.

8. Reporting on Investment Performance

8.1 The RFO will report regularly to the Council on the investment performance of the investments, quarterly to the Council, including forecasts for the coming year and end-of-year activity.

Investment forecasts for the coming year will be accounted for when the budget is prepared. At the end of the financial year, the RFO will report on investment activity to the Council.

9. External Borrowing Strategy

- 9.1 The Council acknowledges the importance of borrowing funds and the financial impact on the Council and on the precept.
- 9.2 Council will agree borrowing for specific capital projects as defined in section 16 of the 2003 Act and all borrowings must be approved by Full Council. Before a council can borrow money, approval must first be received from the Secretary of State by way of the Department for Communities and Local Government (DCLG) via an application made to the National Association of Local Councils (NALC) through the Somerset County Association of Local Councils (SALC). The process to be followed and the criteria applied in deciding whether or not approval should be forthcoming, are detailed in the Guide to Parish and Town Council Borrowing in England, jointly published by NALC.
- 9.3 Any borrowing approval granted will be retained permanently as part of the Council's records.
- 9.4 The Council is only authorised to borrow a maximum of £500,000 in any single financial year.
- 9.5 When considering an application for borrowing approval, the Council will ensure the following criteria is followed are met: when considering obtaining borrowing approval:
 - The borrowing should only be used for the purpose of capital expenditure as defined by section 16 of the LGA Local Government Act 2003 Act.
 - Any unallocated balances including, where appropriate capital receipts beyond those required for the prudent financial management of the Council, should be used in the project for which the borrowing is required.
 - The Council should have a realistic budget for the servicing and repayment of the debt, taking into account the future effect on the Council's precept and cashflow.
 - The Council must not mortgage or charge any of its property as security for the money borrowed.

10. Lender

10.1 The Council will usually borrow funds from the Public Works Loan Board (PWLB) seeking the most favourable and will research the best possible interest rates. offered by the PWLB.

11. Period of Loan

- 11.1 The Council will determine the period of loan period which should not exceed the period for which the expenditure is forecast to provide benefit to the Council, that is the expected useful life of the asset.
- 11.2 The Council will consider the effect on the level of repayments and therefore the effect on future precepts when considering the period of the loan.
- 11.3 The Council will also adhere to the requirements, namely consultation with local people about the planned project and about the intention to borrow and how the repayment will affect the budget (and residents' Council Tax). The evidence must demonstrate residents' support for the need and the need to borrow. Evidence of communications will be submitted with the borrowing application.

12. Risk Management

- 12.1 The Council will monitor investments and borrowing to manage financial risks, including:
 - Counterparty creditworthiness
 - Diversification of investments
 - Regular review of liquidity
 - Compliance with statutory and professional guidance

13. REVIEW AND AMENDMENT OF THIS POLICY

—This policy will be reviewed every 2 years. However, the Council reserves the right to make variations to this policy at any time, subject to approval of Full Council.

13. Freedom of Information

13.1 In accordance with the Freedom of Information Act 2000, this document will be posted on the Council's website. Investment and borrowing summaries will also be available on request.

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Updated at Full Council meeting: 23rd January 2017 Minute No. 16/17 177.

Updated by Policy & Resources Committee: 10th October 2022 Minute No. 22/23 16c.

Reviewed at Full Council meeting: 28th October 2024 Minute No. 24/25 76b.

Updated at Policy & Resources Committee: 13th October 2025 Minute XXXXXX

This policy will be reviewed every four years, or sooner if required by changes in legislation or council practice.

Review Date: October 2029



Open Spaces Policy

1. Introduction

- 1.1 Crewkerne is blessed with fine countryside, much of it accessible, but people of all ages & backgrounds need open spaces close to where they live. Open space is land in some form of public ownership that is regularly available for recreational or sporting use by the community, and also includes a cemetery and churchyard. Open spaces are valued community assets improving public health, well-being and quality of life, and bringing regeneration benefits to an area.
- 1.2 As well as providing space for recreation and exercise, parks and open spaces perform a considerable range of other vital functions for the community such as the following:
 - Habitat for wildlife and movement corridors for animals, important to local nature conservation
 - Flood protection providing areas for rainfall to drain away
 - Space for trees, too large for many gardens, which in turn provide shade, climate regulation and shelter
 - Air and water purification
 - Aesthetic & landscape enhancement and protection of green vistas
 - Sense of well-being, improving desirability of an area and increase in property value
 - A venue for social interaction, public art and community events
 - An outdoor classroom allowing children to explore and learn about the natural world
 - Land for community food growing and enjoying horticultural achievements
 - Protection of areas and structures of heritage value
 - Carbon sequestration in tackling the causes of climate change
- 1.3 Environmental change and the need for increased biodiversity will have an effect on the way open spaces are managed.

2. Open Spaces Managed by Crewkerne Town Council

- 2.1 Crewkerne Town Council owns and manages the following open spaces:
 - Happy Valley Recreation Ground
 - Barn Street Recreation Ground
 - Bincombe Beeches Nature Reserve
 - Severalls War Memorial Garden

- Henhayes Recreation Ground
- Southmead Play Area
- Severalls Bowling Green
- Severalls Tennis Courts
- Townsend Cemetery
- St Bartholomew's Church Grounds

3. Objectives

- 3.1 Open spaces provide opportunities for all areas of our community and include play opportunities, places to walk and sit quietly, and protection for wildlife and social areas.
- 3.2 There is an agreed procedure for the upkeep of open spaces and these are maintained for the optimum use of all residents. This procedure is determined by Council staff, in particular the Operations Manager, and is communicated to, and known, by all Grounds Staff. This will include details on where grass is to be cut, wild areas, areas of rewilding, frequency of maintenance, tree planting/pruning/removal, equipment inspections and records.
- 3.3 Sports pitches will be maintained to a reasonable standard and where a team requires additional work undertaken this can be done either at an additional cost to the sports club or with the written agreement of the council to undertake it themselves.
- 3.4 Upkeep of these open spaces remains under the control of Crewkerne Town Council and no additional work is to be undertaken in any open space without the written permission of Crewkerne Town the Council. Any unauthorised work will be considered to be criminal damage and action taken accordingly.

4. Tree Policy

- 4.1 The Council will ensure that newly planted trees receive appropriate aftercare, including watering of approximately 20 litres per tree per week during their first two years, based on guidance from the Forestry Commission and Woodland Trust. Watering will be adjusted according to weather conditions, with increased frequency during prolonged hot or dry spells, and reduced during periods of consistent rainfall. Mulching around the base of young trees will be encouraged to conserve soil moisture, suppress weeds, and improve overall establishment.
- 4.2 For Crewkerne Town Council owned trees, we will endeavour to:
 - Maintain our trees in a safe condition.
 - Prune our trees when they are causing an actual nuisance, i.e. damage to buildings.
- 4.3 Tree Works the Council are not able to do:
 - Prune privately owned trees.
 - Prune trees back because they are overhanging.
 - Systematically prune trees to control their size or height.
 - Prune or remove trees in order to improve light.

- Prune or remove trees to improve a view.
- Prune or remove trees because of falling leaves, sap, seeds or debris.
- Prune or remove trees to improve television or satellite reception.
- 4.4 Common tree related enquiries: If the tree does not belong to CTC and the resident is concerned about:
 - Electricity cables (trees interfering with) and supply: National Grid (formerly Western Power) 0800 096 3080
 - Telephone wires BT Faults 0800 800151
 - Trees threatening or obstructing the Highway (including pavements) –
 Somerset Council Highways 0300 123 2224
 - Trees obstructing streetlights Somerset Council Streetlight Department 0345 601 0939
 - Trees obstructing right of way Somerset Council Highways 0300 123
 2224
 - High evergreen hedges refer to land owner or Somerset Council Tree
 Officer
 - Nesting birds and roosting bats contact the police 101
 - If the resident is unsure about which arborist to employ, helpful consumer advice and directories are available at www.trees.org.uk
- 4.5 Doing the work yourselves: In common law, a property owner can cut back overhanging branches to the boundary of their property. Crewkerne Town Council will usually have no objection to property owners carrying out this type of tree works or engaging a contractor at their own expense, **providing:**
 - Access is not gained via Council land or trees, without written permission of the Town Clerk
 - The tree is not situated within a Conservation Area or subject to a Tree Preservation Order Refer to the Town Clerk.
 - That any work to the tree is not detrimental to its health or stability and is carried out in accordance with British Standard 2998:2010 Tree Works
 - That the cut branches are disposed of in a responsible manner and that no unauthorised damage to Council property occurs
 - Works to any tree situated in a Conservation Area, whether Council or privately owned, should have the correct permissions obtained from the Local Planning Authority (LPA) before commencement
- 4.6 No timber is to be removed by the public from Council open spaces without the express written permission of the Town Clerk.

5. Grass Cutting

5.1 The Council will review grass cutting practices annually to balance recreation, public safety, and biodiversity. Other areas may be maintained in a different way to encourage biodiversity, increase wildlife habitat or to save costs. In these areas throughout the spring and summer, the In wildlife and designated areas, grasses are will be allowed to grow to create a meadow effect, with mowing limited to once or twice per season and cuttings removed to encourage wildflowers. and Mown

pathways are cut in between will provide access while leaving larger areas undisturbed for pollinators and small mammals. Wildflowers will also be actively sown in areas determined by the Town Clerk in conjunction with the Operations Manager. Other areas may be managed differently to support biodiversity, increase habitat, or reduce costs.

- 5.2 Grass cutting policy will be dependent on the area. Pitches will be maintained to a suitable standard. Should a club need maintenance to a higher standard, then this should be made known to the Town Council for consideration. Permission must be in writing and at the club's cost.
- 5.3 In the autumn, the flat open areas will be cut back before the winter. The time of this cut will be determined by the Town Council and timescales may vary depending on weather and staff capacity. Pathways may continue to be cut in the autumn/winter depending on the weather, but the grass will be allowed to grow longer outside of these areas.
- 5.4 The Churchyard and Cemetery will have their own requirements which may be a mixture of continued grass cutting throughout the season and wilder areas.

6. Management of Bees, Wasps and Hornets Nests

- 6.1 The Town Council will, wherever possible, leave nests in place to support biodiversity and the important role these species play in the environment. Where a nest is found in a public area, the Council may cordon off the location or put up warning signs to reduce risk while allowing the nest to remain undisturbed.
- 6.2 The Clerk in conjunction with the Operations Manager will assess whether a nest presents a significant risk to public safety on a case-by-case basis, with the priority of balancing public safety with environmental protection. If cordoning is not practical, the Council may arrange for safe removal or treatment. This may be carried out by a member of staff or a qualified contractor, depending on the nature of the nest and the level of risk.

7. Dog Walking

7.1 Crewkerne Town Council allows well behaved dogs in all its open spaces except Barn Recreation Ground which has a dog ban.

8. Invasive Species

8.1 The public are not allowed to plant any plants, flowers or trees on Council open spaces without prior written agreement. Any non-native or invasive species will be removed, without warning, and disposed of or rehomed as necessary.

9. Financial implications

9.1 There are financial implications to Crewkerne Town the Council for maintaining open spaces and changes may be made to agreed procedures to allow for budget

management or special events. This decision can be made by the Town Clerk in conjunction with the Chair of Amenities Committee.

10. Biodiversity Considerations

10.1 The Natural England and Rural Communities Act of 2006 placed a duty on authorities in England (including Town Councils) to have regard to conserving biodiversity as part of their policy and decision-making processes. This was subsequently strengthened under the Environment Act of 2021 which asked public authorities to consider what they can do to enhance biodiversity in England. The first consideration of this duty must be completed by 1st January 2024.

This means a public authority must:

- Consider what they can do to conserve and enhance biodiversity.
- Agree policies and specific objectives based on their consideration.
- Act to deliver policies and achieve objectives.

10.2 What The Town Council will: do?

- Consider the impact on biodiversity in the decisions made by the Town Council, especially when commenting on planning applications.
- The Council # will seek to reduce the use of pesticides and herbicides used on Town Council owned land. In particular, it will aim to minimise its use of glyphosates and will explore alternative methods of vegetation management, especially at Bincombe Beeches Nature Reserve, in order to protect biodiversity and support more sustainable land management practices. However, glyphosates may be used where no other suitable or effective options are available, and only after consideration of the potential environmental impact.
- It will regularly review how it manages the open spaces identified above.

10.3 and consider Where possible the Council will:

- Leaving standing and fallen dead wood as a habitat for invertebrates.
- Leaving leaf litter and dead vegetation wherever possible as a habitat for invertebrates.
- Removing invasive and non-invasive species that are detrimental to native flora or fauna as required.
- The Town Council will consider reducing the number of cuts in appropriate areas to allow the grasses to grow and be swathed in September.
- Ensure that there is a margin of uncut grass around the hedges to allow longer grasses to grow.
- Allow fallen tree branches to remain, if safe, to allow invertebrates to inhabit.
- To preserve the Lucombe Oak tree and encourage biodiversity the area under the tree will be left wilded and to protect the tree's root system.
- 10.4 The Crewkerne Neighbourhood Plan is being drafted and the Town Council supports the discussion of biodiversity and added to the plan as necessary.
- 10.5 Hedge cutting will takes place twice a year. All hedges are cut outside of the bird nesting season.
- 10.6 The Town Council will look to install bird boxes in Town Council owned trees, and

The Town Council will look to promote biodiversity via the Town Council website.

Version Control:

Adopted by Full Council: 18th December 2023, Minute No. 119 23/24 Updated at Policy & Resources Committee: 13th October 2025 Minute XXXXXX

This policy will be reviewed every four years, or sooner if required by changes in legislation or council practice.

Review Date: October 2029



Time Off In Lieu (TOIL) Policy

1. Introduction

- 1.1 TOIL is time off which you are allowed to take in lieu of additional hours worked beyond the normal working day, with your line manager's prior agreement.
- 1.2 It applies to additional periods of work outside the normal working day. It does not apply to rest periods.
- 1.3 You should ordinarily perform your work duties during normal working hours as defined within your contract of employment except when you are required to attend visits, meetings, conferences or other duties outside normal office hours, either as a regular or exceptional part of your job.
- 1.4 Time off in lieu is not to be accumulated or approved in such a way that a change in normal working arrangements results (e.g. every Friday is a 'TOIL' day). TOIL is exceptional rather than a regular or routine occurrence.
- 1.5 This TOIL policy applies to all employees, including staff on temporary and fixed term contracts. It is intended to ensure fair treatment, adequate rest, and compliance with the Working Time Regulations.

2. Accumulation of TOIL

- 2.1 TOIL must be accumulated within a plan agreed with your line manager. Any additional hours worked which are to be claimed as TOIL, must be agreed in advance. The minimum amount of additional working time that can be claimed as TOIL is a continuous period of two hours normally one hour, though shorter periods may be agreed in advance. TOIL does not accrue for short 'ad hoc' periods of working, unless expressly agreed by the Town Clerk. for example a quarter or half an hour. If prior managerial agreement is not in place, then the additional hours will not qualify for the accrual of TOIL and will be lost.
- 2.2 When you identify potential additional hours which might justify TOIL you should raise this with your Line Manager. If the additional hours are agreed you should follow up your conversation with your line manager with what has been agreed and ask them to reply with their approval. TOIL will only be granted if this is completed in advance and agreed with the relevant manager, unless there are exceptional circumstances which could not be foreseen in advance. In such situations the line manager has discretion to either grant or reject the application retrospectively.

- 2.3 Time off accumulated through TOIL arrangements must be equal to time actually worked during the normal working week (i.e. an hour's TOIL for each hour worked, regardless of whether it is worked in normal office hours, the evening or weekend).
- 2.4 When travelling on behalf of the organisation, including attending conferences, training course, or other events, TOIL for travel time will accrue at half the normal rate (e.g. 1 hour for 2 hours of travel). The assumption is that you will not be working during travel; however if you do work during travel time, the TOIL accrues as working hours. No TOIL accrues for optional post-event meals or parties.

3. Managing and claiming TOIL

- 3.1 On termination of employment, all TOIL must be at a zero balance. You will not normally be paid in lieu of accrued TOIL which has not been taken by the final date of employment. Any such accrued TOIL may be lost. The Town Clerk should ensure staff use up TOIL during their notice period wherever possible.
- 3.2 TOIL should be taken as soon as practicably possible after it has been accrued to ensure proper rest and refreshment. If this is not possible it must be taken within 4 weeks (or up to 3 months by agreement with the Town Clerk) of accrual. TOIL accrued and not redeemed within 4 weeks the agreed period of accrual will be considered lost and no monetary compensation will be offered unless otherwise agreed with the Town Clerk.
- 3.3 If you wish to take approved TOIL this has to be agreed with the relevant line manager at least one week in advance. The line manager may not agree to the request in cases where this leave will conflict with the provision of an adequate service by the team. Where line managers do not approve the requested TOIL, suitable alternatives dates (earlier or later) should be identified and suggested.
- 3.4 TOIL may be taken in blocks of half a day or one day, it may not be used to simply leave the office an hour early. Any exceptions to this will need to be agreed with the respective line manager. TOIL may normally be taken in blocks of one hour or more. In exceptional circumstances, the Town Clerk may approve shorter periods.
- 3.5 Line Managers will co-ordinate the TOIL operation of their team to ensure that there is adequate cover for all functions for their area of business. Line Managers should ensure that employees are given reasonable opportunity to take any accrued TOIL within the approved period.
- Line Managers should ensure that TOIL is not used as a method of flexible working but used occasionally to deal with fluctuations in workload.
- 3.7 Employees must keep a proper account of additional hours worked, and manage their TOIL in agreement with their line manager. TOIL should be recorded on the agreed timesheet template or HR system. In the case of the Town Clerk, TOIL will be managed in consultation with the Mayor.
- 3.8 Before working planned additional hours employees must agree the proposal with their line manager, along with the likely TOIL that will be generated, and when it will be taken.

- 3.9 The TOIL policy and its operation depend on mutual trust. Whilst this policy seeks to provide guidance, it is recognised that not all circumstances and situations can be accommodated. In doubt, advice should be sought from the Town Clerk. Any suspected abuse of TOIL will be treated as a disciplinary matter, not least as it may involve fraud.
- 3.10 Under certain circumstances the Council may choose to "buy" the TOIL rather than allow it as time off in lieu, this should not be assumed by the employee and is at the full discretion of the Full Town Council or staffing committee. This will be exceptional and at the discretion of the Full Town Council or Staffing Committee, for example where service delivery pressures mean time off cannot reasonably be taken.

Version Control:

Adopted at the Policy & Resources Committee: 12th February 2024 Min. No. 32/2324c. Updated at the Policy & Resources Committee: 13th October 2025 Min. No. XXXXXX

This policy will be reviewed every four years, or sooner if required by changes in legislation or council practice.



Child and Vulnerable Person Protection Policy and Guidance

1. Introduction

- 1.1 This is a statement of intent that demonstrates a commitment to safeguard children and vulnerable people from harm in Town Council premises. The essential inclusions for a Child and Vulnerable Person Protection Policy are outlined below:
 - The welfare of the child or vulnerable person is paramount. Crewkerne Town
 Council recognises its duty of care under the Children Act 1989, the Children
 Act 2004, the Care Act 2014, and the Working Together to Safeguard Children
 2023 guidance. This policy also aligns with the Safeguarding Vulnerable Groups
 Act 2006.
 - All children and vulnerable people without exception have the right to protection from abuse regardless of gender, ethnicity, disability, sexuality or beliefs.
- 1.2 All groups and organisations using Town Council owned and managed property shall conform to an appropriate policy. If they do not have their own safeguarding policy, then they can they must adopt one using the template provided in Appendix A to create one before any booking, grant, or licence is approved. Please note that the document needs to be completed and adopted by the group or organisation before any usage or grant can be issued.
- 1.3 As an organisation, the Town Council are committed to:
 - Demonstrating a commitment to the importance of safeguarding and promoting children and vulnerable person's welfare.
 - Demonstrating a clear line of accountability within the organisation for work on safeguarding and promoting the welfare of children and vulnerable people.
 - Provide training on safeguarding and promoting the welfare of children/vulnerable people for all staff and Councillors working with, or in contact with, children, vulnerable people and their families.
 - Operate safe recruitment, selection and vetting procedures. Ensure all staff, councillors, and volunteers undertaking regulated activity have an up-to-date Disclosure and Barring Service (DBS) check appropriate to their role.
 - Possess effective inter-agency working and effective information sharing, to safeguard and promote the welfare of children and vulnerable people.
 - Ensure children, vulnerable people and their families are informed of the policy and procedures as appropriate.
 - Demonstrate that all concerns, and allegations of abuse will be taken seriously by the organisation and responded to appropriately.
 - Ensuring that the Council will never unnecessarily create a risk environment for children or vulnerable people.
 - Abiding by the Council's code of conduct on Child and Vulnerable Person Protection issues (see below).

2. Code of Conduct

2.1 All staff and Councillors have read this code of conduct and agree to abide with its content.

- Everyone is-expected to conform to socially acceptable standards, these standards being of a moral, ethical, personal and professional nature.
- Everyone must respect the rights of every human being without exception or prejudice of race, religion, gender, sexual orientation, ethnic origin or political affiliation.
- Everyone will be concerned primarily with the well being, safety and protection of the individual.
- Everyone is responsible for setting and monitoring the boundaries between a working relationship and friendship with customers, especially when a young/vulnerable person is involved.
- Everyone must realise that certain situations or friendly words and actions could be misinterpreted, not only by the individual but also by outsiders and could lead to allegations of misconduct or impropriety.
- Where physical contact between Councillors or staff and members of the public is necessary, everyone must ensure that no action on their part could be misconstrued.
- 2.2 Any concerns about the conduct of staff, councillors, or volunteers in relation to children or vulnerable people should be reported immediately to the Town Clerk, who will follow the safeguarding reporting procedures.

3. Confidentiality

- 3.1 The management of confidentiality is an essential factor in all issues relating to vulnerable person protection. Staff and Councillors should never give children or adults an absolute guarantee of confidentiality but must ensure that the information is disclosed only to the people who need to know. It should be explained to the children and young people that secrets cannot and should not be kept if keeping it means that they, or others, will continue to be harmed.
- 3.2 Major concerns and fears should not be discussed with parents, anyone else involved with the care of the child or young person, or anyone named in any allegation before a discussion with the Clerk.

4. Reporting Abuse

- 4.1 If a member of Staff or Councillor is informed by someone of abuse they should apply the following basic principles:
 - Keep an open mind and do not jump to conclusions.
 - Listen to the person rather than directly question him or her.
 - Never stop someone who is freely recalling significant events.
 - Make a note of the discussion, taking care to record the timing, setting and who
 was present, as well as what was said.
- 4.2 If a vulnerable person tells you that he or she is being abused:
 - React calmly so as not to frighten or deter them.
 - Reassure them that you are glad that they told you.
 - Don't promise to keep it to yourself.
 - Explain that you need to make sure that they will be safe and may have to pass on the information to someone trusted to deal with it appropriately.
 - Listen to what the vulnerable person says and take it seriously.
 - Only ask questions if you need to clarify what the vulnerable person is telling you don't ask the vulnerable person about explicit details.

- Don't ask leading questions, ie. one that pre-supposes the answer e.g. "Did Jim hit you?"
- Make a detailed note of what the vulnerable person has told you but do not delay passing on the information.
- 4.3 It is never easy to respond to a young/vulnerable person who tells you that they are being abused and you may feel upset and worried yourself. Make sure that you are offered adequate support and an opportunity for de-briefing, bearing in mind confidentiality.
- 4.4 Action to take following concerns of abuse:
 - Report concern immediately to the Town Clerk (Designated Safeguarding Lead).
 - The Town Clerk will assess and decide whether to refer to Somerset Council Children's Social Care or Adult Social Care.
 - If the concern is urgent and the Town Clerk is unavailable, contact Somerset Council's Safeguarding Team directly or the Police if a child/vulnerable person is at immediate risk.
- 4.5 The Town Clerk will be the liaison with the Council in all vulnerable person protection issues.

5. Protecting Staff

- 5.1 These guidelines protect both the individual and the organisation from potential allegations. Staff and councillors should always aim to work in an open environment where actions and behaviour are transparent.
- 5.2 Outlined below is some general guidance to protect yourself from allegations of abuse. **DO NOT:**
 - Spend excessive amounts of time alone with a vulnerable person away from others
 - Take a vulnerable person alone in a car on journeys, however short.
 - Take a vulnerable person to your home.
 - Engage in rough physical games including horseplay.
 - Engage in sexually provocative games.
 - Allow or engage in inappropriate touching of any form.
 - Allow a vulnerable person to use inappropriate language unchallenged.
 - Make sexually suggestive comments about or to a vulnerable person even in fun
 - Let allegations a vulnerable person makes go unchallenged or unrecorded.
 - Do things of a personal nature for a vulnerable person that they can do themselves.

Version Control:

Adopted at Full Council: 10th August 2009, Min. No. 60.
Updated at Policy and Resources Committee 12 June 2017 Min No 17/18 08 a)
Updated at Policy & Resources Committee: 13th October 2025 Minute XXXXXX

This policy will be reviewed every four years, or sooner if required by changes in legislation or council practice.

Child and Vulnerable Person Protection Policy Pro Forma

Organisation / group:

Designated Person:

Definition of "Appropriate People": The group of people who need to read and understand this document eg. staff, volunteers, trustees.

This is a statement of intent that demonstrates a commitment to safeguard children and vulnerable people from harm.

As an organisation, we are committed to:

- Demonstrating a commitment to the importance of safeguarding and promoting children and vulnerable person's welfare.
- Demonstrating a clear line of accountability within the organisation for work on safeguarding and promoting the welfare of children and vulnerable people.
- Provide training on safeguarding and promoting the welfare of children/vulnerable people for all staff working with, or in contact with, children, vulnerable people and their families.
- Operate safe recruitment, selection and vetting procedures. Ensure all staff, councillors, and volunteers undertaking regulated activity have an up-to-date Disclosure and Barring Service (DBS) check appropriate to their role.
- Possess effective inter-agency working and effective information sharing, to safeguard and promote the welfare of children and vulnerable people.
- Ensure children, vulnerable people and their families are informed of the policy and procedures as appropriate.
- Demonstrate that all concerns and allegations of abuse will be taken seriously by the organisation and responded to appropriately.
- Abiding by our code of conduct on Child and Vulnerable Person Protection issues (see below).

Code of Conduct

All Appropriate People have read this code of conduct and agreed to abide with its content.

- Everyone is-expected to conform to socially acceptable standards. These standards being of a moral, ethical, personal and professional nature.
- Everyone must respect the rights of every human being without exception or prejudice of race, religion, gender, sexual orientation, ethnic origin or political affiliation.
- Everyone will be concerned primarily with the well being, safety and protection of the individual.
- Everyone is responsible for setting and monitoring the boundaries between a working relationship and friendship with customers, especially when a young/vulnerable person is involved.
- Everyone must realise that certain situations or friendly words and actions could be
 misinterpreted, not only by the individual but also by outsiders and could lead to allegations of
 misconduct or impropriety.
- Where physical contact between anyone and members of the public is necessary, everyone
 must ensure that no action on their part could be misconstrued.

Any concerns about the conduct of staff, councillors, or volunteers in relation to children or vulnerable people should be reported immediately to the Town Clerk, who will follow the safeguarding reporting procedures.

Confidentiality

The management of confidentiality is an essential factor in all issues relating to vulnerable person protection. Appropriate People should never give children or adults an absolute guarantee of confidentiality but must ensure that the information is disclosed only to the people who need to know. It should be explained to the children and young people that secrets cannot and should not be kept if keeping it means that they, or others, will continue to be harmed.

Major concerns and fears should not be discussed with parents, anyone else involved with the care of the child or young person, or anyone named in any allegation before a discussion with the the designated person.

Reporting Abuse

Suspicion of abuse

If the appropriate people are informed by someone of abuse they should following basic principles:

- Keep an open mind and do not jump to conclusions.
- Listen to the person rather than directly question him or her
- Never stop someone who is freely recalling significant events
- Make a note of the discussion, taking care to record the timing, setting and who was present, as well as what was said.

If a vulnerable person tells you that he or she is being abused

- React calmly so as not to frighten or deter them.
- Reassure them that you are glad that they told you
- Don't promise to keep it to yourself.
- Explain that you need to make sure that they will be safe and may have to pass on the information to someone trusted to deal with it appropriately
- Listen to what the vulnerable person says and, please, take it seriously.
- Only ask questions if you need to clarify what the vulnerable person is telling you don't ask the vulnerable person about explicit details.
- Don't ask leading questions a leading question is one that pre-supposes the answer e.g. 'Did Jim hit you?'
- Make a detailed note of what the vulnerable person has told you but as advised in the previous section, please don't delay passing on the information.

It is never easy to respond to a young person who tells you that they are being abused and you may feel upset and worried yourself. Make sure that you are offered adequate support and an opportunity for de-briefing, bearing in mind confidentiality.

Action to take following concerns of abuse:

- Report concern immediately to the Town Clerk (Designated Safeguarding Lead).
- The Town Clerk will assess and decide whether to refer to Somerset Council Children's Social Care or Adult Social Care.
- If the concern is urgent and the Town Clerk is unavailable, contact Somerset Council's Safeguarding Team directly or the Police if a child/vulnerable person is at immediate risk.

Designated person

The Town Clerk will be the liaison with the organisation/group in all vulnerable person protection issues.

Protecting Appropriate People

These guidelines protect both the individual and the organisation from potential allegations. Staff and councillors should always aim to work in an open environment where actions and behaviour are transparent.

Outlined below is some general guidance to protect yourself from allegations of abuse.

DO NOT:

- Spend excessive amounts of time alone with a vulnerable person away from others.
- Take a vulnerable person alone in a car on journeys, however short.
- Take a vulnerable person to your home.
- Engage in rough physical games including horseplay.
- Engage in sexually provocative games.
- Allow or engage in inappropriate touching of any form.
- Allow a vulnerable person to use inappropriate language unchallenged.
- Make sexually suggestive comments about or to a vulnerable person even in fun.
- Let allegations a vulnerable person makes go unchallenged or unrecorded.
- Do things of a personal nature for a vulnerable person that they can do themselves.



Data Protection Policy

1. Introduction

- 1.1 Crewkerne Town Council (referred to in this document as "the Council") processes a wide range of data relating to its employees, Councillors, residents and customers, and other data subjects in order to deliver Council services and to discharge its legal and statutory responsibilities.
- 1.2 The Council is committed to being as transparent as possible about its operations and details of information which is routinely available are contained in the Council's Publication Scheme, which is consistent with the statutory model publication scheme for local councils.
- 1.3 The Council takes the protection of personal data seriously and is committed to protecting this information in accordance with the requirements of the General Data Protection Regulation (GDPR) and the Data Protection Act 2018. The Council acknowledges its responsibility as a Data Controller and will be able to demonstrate compliance with the Data Protection Principles under the accountability principle. Where appropriate, the Council's appointed Data Protection Officer (DPO) or Clerk will oversee compliance and act as the main point of contact for data protection matters.
- 1.4 When handling such information, the Council, and all staff or others who process personal information on its behalf, must comply with the six Data Protection Principles which are set out in the General Data Protection Regulation (GDPR). These state that personal data shall be:
 - Processed fairly, lawfully and in a transparent manner in relation to the data subject.
 - Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.
 - Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
 - Accurate and, where necessary, kept up-to-date.
 - Kept in a form that permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed
 - Processed in a manner that ensures appropriate security of the personal data including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

2. Data Protection Terminology

2.1 Data subject: means the person whose personal data is being processed.

Personal data: information about a living individual which is capable of identifying that individual, e.g. a name and address.

Sensitive personal data Special category data: includes information about racial or ethnic origin, political opinions, religious beliefs, trade union membership, medical information, sexual orientation, genetic and biometric data.

Data controller: the person or organisation who determines the purposes for which and the manner in which any personal data is to be processed. The Council is the data controller.

Data processor: the person or organisation that processes the data on behalf of the data controller.

Data breach: a breach of security leading to accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data.

Processing: anything done with/to personal data (obtaining, recording, adapting or holding/storing).

Consent: is a positive, active, unambiguous confirmation of a data subject's agreement to have their data processed for a particular purpose. Consent must be easy to withdraw and must be freely given, provided on an opt-in basis rather than opt-out.

3. Processing of Personal Data

- 3.1 The Council will maintain a Record of Processing Activities (ROPA) to document what personal data it holds, why it is collected, who has access, and how long it is retained. This ensures accountability and transparency in accordance with Article 30 of the GDPR.
- 3.2 The Council processes personal data in order to:
 - Fulfil its duties as an employer by complying with the terms of contracts of employment, safeguarding the employee and maintaining information required by law.
 - Pursue the business of the Council through its powers and duties as a public body.
 - Fulfil its contractual terms with other organisations.
 - Assist regulatory and law enforcement agencies.
 - Process information including the recording and updating details about its Councillors, employees, partners and volunteers.
 - Process information including the recording and updating details about individuals who contact it for information, or to access a service, or make a complaint or to provide feedback to the Council.
 - Undertake surveys, censuses and questionnaires to fulfil the objectives and purposes of the Council.
 - Prevent or detect fraud through the necessary audit tasks carried out for the Council.
 - Monitor its activities including the equality and diversity of its activities.
- 3.3 The GDPR sets out the following six lawful bases for processing personal data:
 - The individual has consented to the processing.
 - Processing is necessary for the performance of a contract or agreement with the data subject.
 - Processing is required under a legal obligation.
 - Processing is necessary to protect the vital interests of the individual.
 - Processing is necessary to carry out public functions.
 - Processing is necessary in order to pursue the legitimate interests of the data controller.
- 3.4 The Council will ensure that at least one of these conditions is met for personal information to be processed.

- 3.5 Particular attention is paid to the processing of any sensitive personal information and the Council will ensure that at least one of the following conditions is met:
 - Explicit consent of the individual.
 - Required by law to process the data for employment purposes.
 - A requirement in order to protect the vital interests of the individual or another person.

4. How the Council uses Personal Information

- 4.1 The Council will only use any personal information for the purposes for which it is provided and will only hold the information for as long as necessary. All Council employees and Councillors who have access to personal data and are associated with the handling of that data are obliged to respect the confidentiality of the data. The Council will endeavour tries to keep the personal information it has accurate and up to date but will amend or erase that information upon request.
- 4.2 The Council will maintain a log of instances where personal data is viewed, shared, or disclosed, ensuring a clear audit trail of access and processing.
- 4.3 Personal data will be retained in accordance with the Council's Records Management Policy, after which it will be securely deleted or destroyed.

5. Information Sharing

- 5.1 The Council may need to pass personal information to other people and organisations that support the Council in provision of services. These providers are obliged to ensure that they process such data in accordance with the requirements of GDPR.
- 5.2 The Council uses organisations to assist with storing information. In such cases the Council will gain assurance that these organisations have security arrangements in place which are compliant with GDPR.
- 5.3 Where personal data is shared with or processed by a third party on behalf of the Council, a written Data Processing Agreement will be in place setting out the obligations of both parties, including confidentiality, security measures, and deletion of data after processing.

6. Information Security

6.1 Crewkerne Town Council will make every effort to ensure that personal information is protected from unauthorised access, loss, manipulation, falsification, destruction or unauthorised disclosure. This is done through appropriate technical measures and procedures including password protection, access control, encryption where appropriate, and staff training on data protection responsibilities. The Council will only keep personal data for the purpose it was collected for and only for as long as is necessary.

7. Data Breaches

7.1 If a member of staff or a Councillor believes that a breach of security of personal data has occurred, they must inform the Town Clerk at the earliest possible opportunity. The Clerk will assess the breach and, where required, notify the Information Commissioner's Office (ICO) within 72 hours. The Clerk will also record all breaches, whether or not they are reported to the ICO, and ensure that lessons are learned to reduce the risk of recurrence. ensure that the Information Commissioners Office is informed and that appropriate

measures are enacted to respond to the breach and to ensure that data security arrangements are reviewed to ensure that further breaches do not occur.

8. Children

The Council will not process any data relating to a child (under 13) without the express parental/guardian consent of the child concerned.

9. Rights of a Data Subject

- 9.1 Under the General Data Protection Regulation (GDPR), individuals have a number of rights in relation to their personal data. These rights allow individuals to understand, control and, where appropriate, restrict how their personal information is used by the Council.
 - Access to Information: an individual has the right to request access to the information the Council has on them. They can do this by contacting the Council.
 - **Information Correction:** If they believe that the information the Council has about them is incorrect, they may contact the Council to allow the data to be corrected.
 - **Information Deletion:** If the individual wishes the Council to delete the information about them, they can do so by contacting the Council.
 - **Right to Object:** If an individual believes their data is not being processed for the purpose it has been collected for, they may object by contacting the Council.
 - Right to Restrict Processing: To request that the Council limits how their data is used.
 - **Right to Data Portability**: to request that their data be provided in a structured, commonly used and machine-readable format.
- 9.2 The Council does not use automated decision making or profiling of personal data.

10. Privacy Notice

10.1 The key aspects of this policy are contained within a Privacy Notice which can be found on the home page of the Council's website. This Notice will be reviewed every four years to ensure it remains accurate and up to date.

11. Subject Access Requests (SARs)

11.1 Individuals wishing to request access to their personal data should submit a written request to the Town Clerk. The Council will respond within one calendar month, in accordance with GDPR requirements. Proof of identity may be required to ensure that data is only disclosed to the correct individual.

Version Control:

Adopted at the Policy & Resources Committee: 14th May 2018 Min. No. 17/18 45 Update at the Policy & Resources Committee: 13th October 2025 Min. No. XXXXXX

This policy will be reviewed every four years, or sooner if required by changes in legislation or council practice.

Crewkerne Town Council and West Crewkerne Parish Council

Joint Burial Committee

Terms of Reference with effect from 1st April 2022

The Crewkerne & West Crewkerne Joint Burial Committee ('the Committee') is empowered to manage and maintain Townsend Cemetery on behalf of Crewkerne Town Council and West Crewkerne Parish Council under the following Terms of Reference with effect from 1st April 2022.

- **1. Background:** The Crewkerne & West Crewkerne Joint Burial Committee is a joint committee of Crewkerne Town Council and West Crewkerne Parish Council formed under section 101 of the Local Government Act 1972, to administer the functions of the two councils these councils' functions as Burial Authorities.
- **2. Name:** The Committee shall be known as The Crewkerne & West Crewkerne Joint Burial Committee.
- **3. Functions:** The committee will exercise operate the burial powers of the two Councils as provided by section 214 of the Local Government Act 1972.
- **4. Host Authority**: Under these Terms of Reference, Crewkerne Town Council shall act as the Host Authority and perform the role of lead authority for the Committee. This includes responsibility for in relation to legal liabilities, financial accountability, contracts, employment and other matters, and other administrative functions of the Committee, on behalf of both Councils.
- **5. Composition:** The Committee shall consist of the following number of Councillors, nominated by their respective Councils:
 - Crewkerne Town Council: 5 members
 - West Crewkerne Parish Council: 3 members
- **6. Terms of Office**: The Annual Meeting of Each Council shall will review and confirm their its Council's representatives on the Committee at its Annual Meeting.
- **7. Meetings:** The Committee will meet on no fewer than four occasions in each year. One of those meetings will be an Annual Meeting, to be held normally held in June, at which the Committee members will elect a Chairman and Vice Chairman from among their members.
- **8. Rules**: The Committee will shall comply with all procedural and legal requirements applicable that apply to committees of Town and Parish Councils. The Committee will operate under the Standing Orders and Financial Regulations of Crewkerne Town Council as the host authority.

9. Finance:

- (i) The full financial records of the Committee shall form part of the accounts of the Host Authority and shall be examined or audited in accordance with according to any statutory requirements and Proper Practices.
- (ii) Before the end of November each year the Committee will prepare a budget for the following year, showing what financial contribution is required from each constituent Council.
- (iii) The two Councils will each contribute to the budget of the Committee in the following proportions:

Crewkerne Town Council: 93%

West Crewkerne Parish Council: 7%

On a quadrennial basis, the committee shall review the latest available population figures of the parishes of Crewkerne and West Crewkerne and use this information to review whether the division of the budget contributions between the two parishes needs to be adjusted.

- **10. Property:** Unless otherwise agreed and specified, ownership of the property will be held by the two Councils in accordance with the above proportions. Further, any rights and liabilities in respect of the property will be shared on the same basis. Where any property within the cemetery is rented to a third party, rental income will be apportioned on the same basis.
- **11. Appointments:** The Clerk to the Host Authority will act as the Clerk to the Committee.

Version Control:

Adopted at the Joint Burial Committee: 7th December 2021 Min. No. 55 21/22 Updated at the Joint Burial Committee: XXXX

This policy will be reviewed every four years, or sooner if required by changes in legislation or council practice.

Crewkerne Town Council

Schedule for Review of Town Council Policies and Procedures

	Schedule for Review of Town Council Policies and Procedures				
Category	Policy/procedure	Date last reviewed	Frequency of review	Date of next review	Comments
Core policies	Financial Regulations	May-25	Annual	May-26	
	Standing Orders	May-25	Annual	May-26	
	Code of Conduct	May-25	4 yearly	May-26	New CoC adopted in line with Unitary creation.
Social media/communications policies	Media policy	Aug-22	4 yearly	Aug-26	
	Website policy	Oct-22	4 yearly	Oct-26	
	Social Media policy	Oct-21	4 yearly	Oct-29	
	Abusive, unreasonable and vexatious complaints policy	Feb-23	4 yearly	Feb-27	
	Customer Service Policy	Jun-23	4 yearly	Jun-27	
	Complaints Policy	Jun-23	4 yearly	Jun-28	
	Community Engagement Strategy	Oct-22	4 yearly	Oct-26	
Finance policies	Investment and Borrowing Management policy	Oct-24	1 yearly	Oct-29	Moved to annually as per new Financial Regulations.
	Delegation to Officers policy	Jul-23	4 yearly	Jul-27	
	Grant Applications policy	Jun-24	4 yearly	Jun-28	
Policies relating to staff	Staff Handbook now *containing: Training Policy Disciplinary, Grievance & Capability Procedures Protocol for Clir-Employee relations Equalities and Diversity Policy Appraisals Policy Whistleblowing Sickness Absence Policy Dignity at Work Policy	Jun-25	Annually	Jun-26	*Staff Handbook adopted June 2025 now covers those areas listed which were previously standalone policies, plus new policies relating to harrassment, paternity leave, carer's leave etc.
	Use of Council vehicles policy	Oct-23	4 yearly	Oct-27	
	Time off in Lieu (TOIL) Policy	Feb-24	4 yearly	Oct-29	
	Employer Pensions Discretions Policy	Mar-25	4 yearly	Mar-29	
Policies relating to management of information	Data protection policy	May-18	4 yearly	Oct-29	
	Information security policy	Jun-24	4 yearly	Jun-28	
	Subject Access Request policy	Oct-23	4 yearly	Oct-27	
	Freedom of Information Model Pub'n Scheme	Feb-23	4 yearly	Feb-27	
	Records management policy	Feb-23	4 yearly	Feb-27	
	CCTV Policy	Oct-21	4 yearly	Oct-29	
	Accessibility Statement	Feb-22	4 yearly	Feb-26	
	Privacy Notice	Feb-22	4 yearly	Feb-26	
	Policy on audio/visual recording and photography at Council meetings	Feb-22	4 yearly	Feb-26	
Policies relating to Health & Safety and compliance	Legionella Written Control Scheme	Feb-25	2 yearly	Feb-27	
compliance	Health & Safety policy	Feb-25	Annual	Feb-26	
Misc.	Allotments policy	Jun-25	4 yearly	Jun-29	
	Flag Flying and Logo policy	Jun-24	4 yearly	Jun-28	
	Child and vulnerable person protection policy	Jun-17	4 yearly	Oct-29	
	Open Spaces Management Policy	Dec-23	4 yearly	Oct-29	
	Co-option Policy	Jun-24	4 yearly	Jun-28	
	Memorial Benches and Trees Policy	Jun-25	4 yearly	Jun-29	
	Volunteer Management Policy	Oct-25	4 yearly	Oct-29	
	Customer Care Tree Policy	Oct-23	4 yearly	Oct-27	
Committee Terms of Reference	Planning & Highways Committee ToR	Oct-23	4 yearly	Oct-27	
	Policy & Resources Committee ToR	Feb-24	4 yearly	Feb-28	
	Amenities Committee ToR	Oct-23	4 yearly	Oct-27	
	Joint Burial Committee ToR	Dec-21	4 yearly	Dec-25	
	Staffing sub-Committee ToR	Feb-23	4 yearly	Feb-27	
	Martyn's Law				
	Data Breach Policy				
	Data Privacy Impact Assessment				
	Strategic Risk Register				
	Personal Relationships at Work				
	Business Continuity Procedure				
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All policies should be reviewed at least once in each cycle of Council, and more frequently should changes to legislation require.

Identifies policies on the next P&R agenda for review Identifies policies which have been reviewed within required timescales Identifies policies which need to be reviewed