

**RESOURCES COMMITTEE**

Minutes of a meeting of the Resources Committee held at 6.30pm on Tuesday, 06 September 2022 in the Town Hall, Banbury.

Present: Councillor Mallon (Chairman)  
Councillors: Colegrave, Garrett, Hussain, Kilsby, Phillips Richards and Strangwood.

Alternate Members: none.

Officers: Mark Hassall (Town Clerk & RFO)  
Paul Almond (Director of Environment)  
Martyn Surfleet (Executive Officer)

**R.11/22 Apologies for Absence**  
Councillor Powell.

**R.12/22 Declarations of Interest**  
None

**R.13/22 Minutes of the last Meeting**  
**IT WAS RESOLVED** that the Minutes of the Meeting held on 14 June 2022 be approved as correct records and signed by the Chairman.

**R.14/22 Income & Expenditure Report**  
The Committee considered a report prepared by the Town Clerk & RFO comparing year-to-date income and expenditure with the projected annual budget for the financial year. The report showed all expenditure incurred up to 19 August 2022.

Officers responded to a range of questions from Members relating to various budget codes and financial procedures. Members' attention was drawn to the fact that overall the Committee's expenditure was within forecast versus the phased YTD budget.

General Services variances were principally

Staffing vacancies contributing £19k, all vacancies have now been filled within the grounds maintenance team.

Increase in insurance costs (£17k)

Timing of invoicing for grounds maintenance works were impacted by seasonality and awaiting August invoicing, across Parks, Football pitches and Horton View £20k.

Ongoing play area equipment being refurbished across the estate awaiting completion £39k.

Prior year utility charges for MUGA's from OCC £6k

Timing of cleaning and wax of Fine Lady Statue

Café build in People's Park due to be opening in late autumn, with Earmarked Reserves to be released following practical completion (£48k)

Underspends on Resources Committee also principally

Reduced Central Admin costs including salaries and training £26k.

Town Council Events are currently within budget parameters, with underspends due to the timing of Food & Drink Festival on 21st August.

Increase in insurance costs (£14k)

Other services to the Public include timing of small grants, and improved interest income.

Other Costs & Income includes increased interest income.

Financial Effects & Risk Assessment

This is a monitoring report so there are no specific financial effects arising from it. Without effective budget monitoring there is a risk that budgets will not be adhered to, thereby weakening the Council's ability to demonstrate an effective use of resources. This risk is being mitigated by closer monitoring of spend using a phased budget.

**IT WAS RESOLVED** to receive and note the Income and Expenditure report.

**R.15/22 Review of Effectiveness of Internal Control Systems for the Financial Year 2022/23**

Members considered the report of the Deputy Town Clerk/RFO indicating that the Council was required, under the Accounts & Audit Regulations (England) 2015 as amended, to carry out an annual review of the effectiveness of its internal audit procedures.

The Committee was asked to review the Council's records and control systems. Members' attention was drawn in particular to the need to consider whether the various internal audit measures in place were commensurate with the risks involved.

**IT WAS RECOMMENDED** to the Council that no changes be made to the Internal Controls programme (as set out in **Appendix A** to the Minutes).

**R.16/22 Risk Management Policy**

The Committee conducted an annual review of the Council's Risk Management Strategy/Policy on the recommendation of the Council's External Auditor.

The objectives of this strategy were reported as being the integration of risk management into the culture of the organisation.

**IT WAS RECOMMENDED** that no changes be made to the Risk Management Policy (as set out at **Appendix B** to the Minutes).

**R.17/22 Treasury Management Review**

Members were advised that under the Local Government Act 2003 the Council was required to determine an Annual Investment Strategy. It was suggested that the Council be invited to adopt the existing policy without amendment.

**IT WAS RECOMMENDED** that the Council formally adopt the Treasury Management policy as set out in **Appendix C** to the Minutes.

**R.18/22 Code of Conduct Update 2022**

Members were advised on changes to the Standards regime as a result of the Localism Act and were invited to review and adopt the new Code of Conduct.

**IT WAS RESOLVED** that the code of conduct and DPI form adopted by the Cherwell District Council as set out at **Appendix D**, be adopted as the code for members and co-opted members of the Banbury Town Council with effect from 20 September 2022, or such other date as may be specified in regulations, to replace the current code of conduct

**R.19/22 Bus Shelter Agreement**

The committee considered the report of the Administrative Officer updating members on the expiration of the lease contract due to expire October 2023.

Due to the current Clear Channel Lease Contract expiring in October 2023, it is suggested that, by way of mutual approval between Banbury Town Council and Clear Channel before the end of October 2022, the contract can only be extended after that time by Deed of Variation.

Clear Channel proposes to invest in 8 new 3-bay Living Roof shelters to replace 8 existing locations – across the advertising and non-advertising estate. Where not suitable for Living Roofs on non-advertising shelters Clear Channel will seek to replace powered shelters with solar power panels.

Further investments in the repainting and refurbishment of the remaining shelter stock to retain and enhance the current provision. This will be supported by Clear Channel who will apply for a small amount of digital advertising to replace the paper panels (subject to planning consent). This is likely to be 3-5 locations to support the additional investment outlined and meet evolving advertiser requirements, once planning permission has been sought, to make the concession sustainable for the term outlined.

On digital screens installed, the Council will have access to unsold space free of charge during the term of the contract to promote Council services, subject to the standard advertising terms and conditions. The average unsold advertising space for paper is 5%, expressed as a percentage over 18 days per year per paper advertising space - where as digital sells to capacity

Landmark Shelters could accommodate solar-powered RTI (real time info), however, the solar RTI Battery box is still in development stages and therefore Clear Channel plan to build in Quarter 3 in 2023 or Quarter 4 in 2024. Other third party RTI units are available if the Town Council wish to pursue that option.

Suggestion for a resolution

- To have the sites surveyed for Living Roofs capability on three of the Bridge Street shelters, this to be in agreement with BTC. **NB** not the shelters that are annually removed to facilitate the Michaelmas Fair.
- If the shelters on Bridge Street are being considered for replacement shelters, clarification is required of design and the implications of the annual removal of two shelters to facilitate the Michaelmas Fair.
- The Landmark shelters would be considered for replacement shelters which would form part of the Agreement, therefore, the Town Council is to continue to fund and arrange the removal and replacement for the local event.

**IT WAS RESOLVED** to receive and note the Bus Shelter Agreement Report

The meeting ended at 6.49pm

### REVIEW OF INTERNAL AUDIT OF COUNCIL'S RECORDS AND CONTROL SYSTEMS FOR THE FINANCIAL YEAR 2022/23

Banbury Town Council is responsible for ensuring that its business is conducted in accordance with the law and proper standards, and that public money is safeguarded and properly accounted for, and used economically, efficiently and effectively. In discharging this overall responsibility, the Council is responsible for putting in place proper arrangements for the governance of its affairs and for ensuring that there is a sound system of internal control which facilitates the effective exercise of its functions.

The Council carries out an annual review of the effectiveness of its internal control procedures. This paper sets out the processes employed at Banbury Town Council.

Banbury Town Council seeks to ensure that the financial management of the Authority is robust and, in particular, that the following financial management principles are incorporated within the system of internal control:

- Compliance with Standing Orders for Contracts
- Compliance with budgetary procedure requirements
- Segregation of financial responsibilities where practicable
- Management supervision
- Personal accountability of staff as budget holders
- Development and maintenance of systems by Managers
- Monitoring of budgets for over and underspends.
- Regular periodic reviews and financial reports
- Setting targets to measure financial performance
- Regular reports showing actual expenditure and income against forecasts for reporting on and reviewing financial performance
- Clearly defined budget setting and capital expenditure guidelines
- Regular monitoring of reserves/balances

The process agreed by the Council which is applied in maintaining and reviewing the effectiveness of governance arrangements, including the system of internal control includes:-

- Reporting on any issues relating to value for money, to ensure use of resources in an economical, effective and efficient way.
- Approval through the relevant Standing Committees of budget plans, the subsequent collation of comments for policy guidance at the Town Council meeting on the setting of the budget and any Precept requirements for the following year.
- Responsibility through the Resources Committee for receiving regular reports on work in progress and to be programmed for the future on internal audit and external audit functions.
- Where any recommendations are made either by the Internal or External Auditor suggesting improvements to the effectiveness of the systems of governance and internal control, a plan of action will be agreed with the relevant Officer within a reasonable period to address weaknesses and to ensure agreed action is undertaken.

#### Monthly checks

The Town Clerk checks the original bank statements against the figures shown in the monthly reconciliation print out. The reconciliation is initialled by the Clerk. All cheques and instructions to bank are signed by two Councillors and the Town Clerk & RFO and a summary of invoices are available for inspection, with the originals available on request

The Clerk/RFO signs the monthly wages transfer created. He then prepares a bank transfer to move the money from the Council's main reserves into the Wages account. This transfer is checked and signed by two Councillors.

### **Meeting cycle checks**

At each meeting cycle (approximately every 8 weeks), the Council receive a summary of expenditure against budget. Any significant variations are set out in a written report.

The Council also retains the services of an independent Internal Auditor who works to an agreed annual programme, which is regularly reported to the Resources Committee. The Internal Auditor has direct access to the Town Clerk. The Internal Auditor is Stuart Pollard of Auditing Solutions Ltd.

### **Annual checks**

Stuart Pollard carries out a full audit of the Council's expenditure and receipts once a year. This audit is carried out at the Town Hall.

In addition to auditing the cashbook, salaries and VAT, the auditor will check that Officers have complied with Financial Regulations (adequate insurance, competitive tendering, delegations etc) and that Councillors have fulfilled their role including their monthly checks and the annual risk assessment. The Internal Auditors report is submitted to the Resources Committee and any recommendations are acted upon in line with agreed resolutions.

The Annual Return is signed off by the full Council after the RFO has explained the significance of section 2 outlining governance responsibilities. The report of the external auditor following review of the Annual Return is then submitted to the Council for consideration as soon as practicable following its receipt. If any changes are required to the Annual Return following the auditor's review it is re-submitted to the Council.

The budget is set by the Resources Committee in November/December and agreed by full Council in January. The budget is reviewed for appropriateness six months into the year and re-apportioned to service areas in line with evolving priorities of the Council.

Our grounds maintenance and other significant contracts are competitively tendered. Work that is outside of the scope of these contracts are quoted for if more than £3k or tendered for if greater than £25k and members receive reports of tender exercises.

**The Council is invited to consider whether the various internal audit measures that are in place are commensurate with the sums of money involved.**

September 2022



## BANBURY TOWN COUNCIL

### RISK MANAGEMENT STRATEGY

#### 1 Introduction

1.1 This document forms the Council's Risk Management Strategy. It sets out:

- What is risk management;
- Why does the Council need a risk management strategy;
- What is the Council's philosophy on risk management;
- What is the risk management process
- Roles and responsibilities;
- Future monitoring

1.2 The objectives of this strategy are to:

- Further develop risk management and raise its profile across the Council;
- Integrate risk management into the culture of the organisation;
- Embed risk management through the ownership and management of risk as part of all decision making processes; and
- Manage risk in accordance with best practice.

#### 2 What is Risk Management?

2.1 *'Risk is the threat that an event or action will adversely affect an organisation's ability to achieve its objectives and to successfully execute its strategies. Risk management is the process by which risks are identified, evaluated and controlled. It is a key element of the framework of governance together with community focus, structures and processes, standards of conduct and service delivery arrangements.'* Audit Commission, Worth the Risk: Improving Risk Management in Local Government, (2001: 5)

2.2 Risk management is an essential feature of good governance. An organisation that manages risk well is more likely to achieve its objectives. It is vital to recognise that risk management is not simply about health and safety, but applies to all aspects of the Council's work.

2.3 Risks can be classified into various types but it is important to recognise that for all categories the direct financial losses may have less impact than the indirect costs such as disruption of normal working. The examples below are not exhaustive:

**Strategic Risk** - long-term adverse impacts from poor decision-making or poor implementation. Risks damage to the reputation of the Council, loss of public confidence, in a worse case scenario Government intervention.

**Compliance Risk** - failure to comply with legislation, laid down procedures or the lack of documentation to prove compliance. Risks exposure to prosecution, judicial review, employment tribunals and the inability to enforce contracts.

**Financial Risk** - fraud and corruption, waste, excess demand for services, bad debts. Risk of additional audit investigation, objection to accounts, reduced service delivery, dramatically increased Council Tax levels/impact on Council reserves.

**Operating Risk** - failure to deliver services effectively, malfunctioning equipment, hazards to service users, the general public or staff, damage to property. Risk of insurance claims, higher insurance premiums, lengthy recovery processes.

2.4 Not all these risks are insurable and for some the premiums may not be cost effective. Even where insurance is available, a monetary consideration might not be an adequate recompense. The emphasis should always be on eliminating or reducing risk before costly steps to transfer risk to another party are considered.

2.5 Risk is not restricted to potential threats but can be connected with missed opportunities. Good risk management can facilitate proactive, rather than merely defensive responses. Measures to manage adverse risks are likely to help with managing positive ones.

### 3 **Why does the Council need a Risk Management Strategy?**

3.1 Risk management will strengthen the ability of the Council to achieve its objectives and enhance the value of services provided.

3.2 The Risk Management Strategy will help to ensure that all Committees/ service areas have an understanding of risk and that the Council adopts a uniform approach to identifying and prioritising risks. This should in turn lead to conscious choices as to the most appropriate method of dealing with each risk, be it elimination, reduction, transfer or acceptance.

3.3 Strategic risk management is also an important element in demonstrating continuous service improvement.

3.4 There is a requirement under the Accounts and Audit Regulations to establish and maintain a systematic strategy, framework and process for managing risk.

### 4. **Risk Management Policy Statement**

Banbury Town Council recognises that it has a responsibility to manage risks effectively in order to protect its employees, assets, liabilities and community against potential losses, to minimise uncertainty in achieving its goals and objectives and to maximise the opportunities to achieve its vision.

The Council is aware that some risks can never be eliminated fully and it has in place a strategy that provides a structured, systematic and focussed approach to managing risk.

Risk management is an integral part of the Council's management processes.

## 5. Implementing the Strategy

### 5.1 Risk Control

Risk control is the process of taking action to minimise the likelihood of the risk event occurring and/or reducing the severity of the consequences should it occur. Typically, risk control requires the identification and implementation of revised operating procedures, but in exceptional cases more drastic action will be required to reduce the risk to an acceptable level.

Options for control include:

**Elimination** – the circumstances from which the risk arises are removed so that the risk no longer exists;

**Reduction** – loss control measures are implemented to reduce the impact/ likelihood of the risk occurring ;

**Transfer** – the financial impact is passed to others e.g. by revising contractual terms;

**Sharing** - the risk is shared with another party;

**Insuring** - insure against some or all of the risk to mitigate financial impact; and

**Acceptance** – documenting a conscious decision after assessment of areas where the Council accepts or tolerates risk.

### 5.2 Risk Monitoring

The risk management process does not finish with putting any risk control procedures in place. Their effectiveness in controlling risk must be monitored and reviewed. It is also important to assess whether the nature of any risk has changed over time.

The information generated from applying the risk management process will help to ensure that risks can be avoided or minimised in the future. It will also inform judgements on the nature and extent of insurance cover and the balance to be reached between self-insurance and external protection.

### 5.3 Risk Management System

**Risk Identification** – Identifying and understanding the hazards and risks facing the Council is crucial if informed decisions are to be made about policies or service delivery methods. The risks associated with these decisions can then be effectively managed.

**Risk Analysis** – Once risks have been identified they need to be systematically and accurately assessed using proven techniques. Analysis should make full use of any available data on the potential frequency of events and their consequences. If a risk is seen to be unacceptable, then steps need to be taken to control or respond to the risk.

**Risk Prioritisation** - An assessment should be undertaken of the impact and likelihood of risks occurring, with impact and likelihood being scored using a matrix (See **Appendix A**). This will require a numeric value to be given to both the likelihood of the risk happening and the severity of the impact if it did, based upon the following scoring:

Low = 1 to 5; Medium = 6 to 11; High = 12 to 25

Where a residual risk is low further action will only be taken where it is viable to do so. Medium risks will be addressed within the next 3 to 6 months. High risks will require action as soon as possible. Strategic, Compliance and Financial risks are identified in the Corporate Risk Register at **Appendix B** whilst Operational risks are identified in a suite of service specific risk assessments held by the Clerk and Service Managers.

## 6 Roles and Responsibilities

6.1 It is important that risk management becomes embedded into the every day culture and performance management process of the Council. The roles and responsibilities set out below, are designed to ensure that risk is managed effectively right across the Council and its operations, and responsibility for risk is located in the right place. The process must be driven from the top but must also involve staff throughout the organisation.

6.2 **Elected Members** – risk management is seen as a key part of the Elected Member's stewardship role and there is an expectation that Elected Members will lead and monitor the approach adopted, including

- (a) Approval of the Risk Management Strategy;
- (b) Analysis of key risks in reports on major projects, ensuring that all future projects and services undertaken are adequately risk managed;
- (c) Consideration, and if appropriate, endorsement of the Annual Governance Statement; and
- (d) Assessment of risks whilst setting the budget, including any bids for resources to tackle specific issues.

6.3 **Employees** – will undertake their job within risk management guidelines ensuring that their skills and knowledge are used effectively. All employees will maintain an awareness of the impact and costs of risks and how to feed data into the formal process. They will work to control risks or threats within their jobs, monitor progress and report on job related risks to the Town Clerk.

6.4 **Town Clerk** – will act as the Lead Officer on Risk Management, and be responsible for overseeing the implementation of the Risk Management Strategy. The Town Clerk will:

- (a) provide advice as to the legality of policy and service delivery choices;
- (b) provide advice on the implications for service areas of the Council's corporate aims and objectives;
- (c) update the Council on the implications of new or revised legislation;
- (d) assist in handling any litigation claims;
- (e) provide advice on any human resource issues relating to strategic policy options or the risks associated with operational decisions and assist in handling cases of work related illness or injury;
- (e) advise on any health and safety implications of the chosen or proposed arrangements for service delivery;

6.5 **Responsible Finance Officer** – as the Council's Section 151 Officer the Deputy Town Clerk & RFO will:

- (a) assess and implement the Council's insurance requirements;
- (b) assess the financial implications of strategic policy options;
- (c) provide assistance and advice on budgetary planning and control;
- (d) ensure that the Financial Information System allows effective budgetary control;
- (e) maintain the Council's Risk Register;
- (f) effectively manage the Council's investment and loan portfolio.

6.6 **Role of Internal Audit** – Internal Audit provides an important scrutiny role by carrying out audits to provide independent assurance to the Council that the necessary risk management systems are in place and all significant business risks are being managed effectively.

Internal Audit assists the Council in identifying both its financial and operational risks and seeks to assist the Council in developing and implementing proper arrangements to manage them, including adequate and effective systems of internal control to reduce or eliminate the likelihood of errors or fraud.

Internal Audit reports, and any recommendations contained within, will help to shape the Annual Governance Statement.

6.7 **Resources Committee** – Review and future development of the Risk Management Policy and Strategy will be overseen by the Resources Committee.

6.8 **Training** – Risk Management training will be provided to Elected Members and staff through a variety of mediums. The aim will be to ensure that both Elected Members and staff have the skills necessary to identify, evaluate and control the risks associated with the services they provide.

6.9 In addition to the roles and responsibilities set out above, the Council is keen to promote an environment within which individuals/groups are encouraged to report adverse incidents promptly and openly.

## 7 **Future Monitoring**

7.1 **Review of Risk Management Strategy** - This Strategy will be reviewed annually.

## 8 **Conclusion**

The adoption of a sound risk management approach should achieve many benefits for the Council. It will assist in demonstrating that the Council is committed to continuous service improvement and effective corporate governance.

**RISK / PRIORITY INDICATOR KEY**

SEVERITY (CONSEQUENCE)
1. Negligible (delay only)
2. Slight (minor injury / damage / interruption)
3. Moderate (Lost time injury, illness, damage, lost business)
4. High (Major injury / damage, Lost time business interruption, disablement)
5. Very High (Fatality / Business closure)

LIKELIHOOD
1. Improbable / very unlikely
2. Unlikely
3. Even chance / may happen
4. Likely
5. Almost certain / imminent

RISK / PRIORITY INDICATOR MATRIX						
LIKELIHOOD	5	5	10	16	20	25
	4	4	8	12	18	20
	3	3	6	9	12	15
	2	2	4	6	8	10
	1	1	2	3	4	5
		1	2	3	4	5
		SEVERITY (CONSEQUENCE)				

SUMMARY		SUGGESTED TIMEFRAME
12-25	High	As soon as possible
6-11	Medium	Within next 3-8 months
1-5	Low	Whenever viable to do so

<b>BANBURY TOWN COUNCIL - CORPORATE RISK REGISTER</b>									
Risk No	Risk Title	Consequence	Risk Owner/s	Likelihood	Severity	Risk rating	Mitigation Actions	Progress	Status
	<b>GOVERNANCE</b>								
G1	Failure to attract sufficient candidates for Member vacancies or elections	Reduced representation of neighbourhoods Lack of member resource Possible meeting inquorate	Members Clerk	1	3	3	-actively publicise Council activities - publicise elections & vacancies on notice boards - publicise elections & vacancies on social media and website		G
G2	Failure to achieve quorum at meetings	Business not transacted Decisions not made	Members Clerk	1	4	4	-issue annual meeting calendar to all members & website - issue meeting agendas promptly - record attendance - Alternate Member scheme in place - virtual meetings held when required during Covid 19		G
G3	Lack of public consultation by Council	Decisions not based on evidence People disenfranchised	Members	3	2	6	-ensure meetings publicised on notice boards & website -use Annual Parish Meeting - place articles in newsletters - include public participation on all Council meeting agendas - ensure seating available at meeting for public - provide advice for members of the public attending -publish agendas and minutes on website -hold monthly Cllr surgery		A
G4	Failure to respond to electors wishing to exercise right of inspection	Complaints received Not transparent Non compliance	RFO	1	2	2	-RFO to advertise facility, and respond to requests		G

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G5	Members acting alone outside meetings	Members outside compliance Indemnities invalid Personal risk	Members	2	3	6	- roles defined in Member/Officer Protocol -Info pack for new clrs to include 'Good Councillor Guide' - members made aware to avoid making commitments on behalf of the council	A
G6	Council decisions not implemented	Confidence undermined Reputation risk arises Possible losses	Clerk	1	4	4	- Cttee Minutes considered at Council and next meeting; - Internal Auditor reviews action	G
G7	Inaccurate, untimely, improper minutes	Poor decisions in future Poor evidence for decisions	Clerk	1	3	3	-Minutes published to councillors and on website.	G
G8	Failure to recognise and address conflict of interest	Lack of transparency Open to complaints of lack of fairness or bias	Members Clerk	1	3	3	-Members to comply with Code of Conduct and SOs - Clerk to offer advice outside of meetings	G
G9	Incomplete/inaccurate register of Members' interests	Lack of transparency Open to complaints of fairness or bias	Members	1	3	3	- interests to be registered with MO within 28 days of election and kept up to date - Forms published via Website	G
G10	Failure to complete/submit Annual Return on time	Auditors report qualified Public confidence suffers	Clerk/RFO	1	3	3	-RFO to maintain diary note	G
G11	Improper contracting procedures	Possible losses Poor levels of service Possible increased costs	Clerk/RFO/ Service Managers	1	2	2	-latest financial regulations to be enforced in all circumstances -use of Contract finder website for over £25K	G
G12	Loss of data on PC due to system fault	Interruption to effective administration Possible financial loss Information Commissioner sanctions	Clerk/DPO	1	4	4	-External hard-drive and UPS power supply installed - Daily on site back up - Daily Off site Cloud back up - Antivirus software in place	G
G13	Loss of services of Town Clerk	Interruption to effective administration	Members Clerk	2	2	4	- Deputy Town Clerk post in place. - Locum assistance available via SLCC	G
G15	Lack of professional advice	Poor decisions Costs and waste Possible non-compliance	Clerk	1	2	2	-Maintain membership of OALC and NALC - Clerk member of SLCC - budget for professional fees	G

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	<b>OBJECTIVES AND STRATEGY</b>								
OS1	Lack of defined objectives or strategy	Resources not directed Poor performance management Risks not base lined	Members	1	3	3	-Council sets Vision, Corporate and Key Service Objectives at start of each new administration		G
OS2	Failure to correctly identify local needs or wishes	Council does not represent the people Resources not applied Democratic deficit	Members	2	3	6	-Ward Cllrs maintain close contact with local residents - use questionnaires to identify local wishes - publicise plans and invite comments - review local papers, especially correspondence sections - use events to seek views and feedback -hold Councillor surgeries		A
OS3	Lack of public participation at meetings	Public voice not heard Potential lack of interest in vacancies Lack of transparency	Members	1	2	2	-ensure meetings publicised on notice board and website for year ahead; - include public participation on Council meeting agendas - ensure seating available at meeting for public - provide advice for members of the public attending -publish agendas and minutes on website		G
<b>REPUTATION</b>									
R1	Allegations of libel or slander	Potential for litigation Costs of investigation Reduces confidence	Members	2	3	6	-Clerk to intervene at meetings -review all press releases or newsletter articles before release - review insurance cover - press protocol and social media policy in place		A
<b>FINANCE</b>									
F1	Accidental damage to fixed assets	Costs of repair Loss of service until repaired	Clerk/RFO	2	2	4	- Maintain insurance - Playground inspection regime established.		G

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F2	Vandalism to fixed assets	Costs of repair Loss of service until repaired	Clerk/RFO	3	2	6	-Maintain inspection regime -Maintain insurance -Liaison with Police	A
F3	Loss to third parties	Possible litigation Costs/damages	Clerk/RFO	1	3	3	-Review health & safety -ensure adequate insurance -check contractors insurance	G
F4	Inadequate insurance	Balance of costs to be found	RFO	1	4	4	-Council to review annually or if circumstances change	G
F5	Loss or damage to moveable assets	Loss of heritage Replacement costs	Clerk	1	2	2	Maces held in Museum unless required for ceremonial purposes	G
F6	Failure to calculate/submit precept on time	Inadequate resources to meet commitments Costs of re-billing	Clerk/RFO	1	3	3	- RFO to respond to CDC Council notices -Timetable agenda item for Members providing sufficient time for additional meetings if required	G
F7	Inadequate annual precept and unsound budget	Inadequate resources to meet commitments	Clerk/RFO/ Members	1	4	4	- Members to build sound budget, using risk register and known commitments. -Members to consider Reserves Policy	G
F8	Failure to account for and recover VAT	Wasted resources	RFO	1	3	3	- RFO to review throughout year - Internal auditor to check	G
F9	Failure to stay within agreed budgets	Inadequate control Potential wasted resources	Members Clerk RFO Service Managers	1	2	2	-All committees to review at each meeting -Internal auditor to check - 6+6 exercise undertaken -Reserves Policy to mitigate short-term impact of loss.	G
F10	Holding excessive or inadequate reserves	Auditors report Poor use of resources Inability to meet commitments	Members Clerk RFO	1	3	3	-Clerk & RFO to review as part of budgeting -Reserves Policy to set percentage of precept. - Council to review size of Reserves	G

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F11	Fraud by Clerk/RFO	Reputation Costs, Litigation	Clerk/RFO	1	3	3	-Adequate internal audit -Regular reporting to members -Control systems for managing expenditure - separation of roles	G
F12	Fraud by Members	Reputation Costs, Litigation	RFO	1	3	3	-Adequate internal audit -Regular reporting to members -Control systems for managing expenditure	G
F13	Illegal activity/payments	Intervention by auditor with possible surcharge	Clerk RFO Members	1	3	3	RFO involved in reports and advises on decisions Payments checked by internal auditor	G
<b>COMPLIANCE</b>								
C1	Inadequate awareness of relevant legislation	Failure to comply	Members Clerk	2	3	6	-Maintain membership of OALC/NALC -Clerk to attend cttee meetings - SLCC training attended	A
C2	Failure to comply with relevant legislation	Litigation Costs Reputation damage	Members Clerk	2	3	6	-Maintain membership of OALC/NALC -Clerk to attend SLCC training -Liaise with internal and external auditors	A
C3	Failure to maintain fixed assets register	Improper control Poor auditor's report	RFO	1	2	2	-Council to review -Internal audit to review	G
C4	Improper financial records	Potential for wasted resources	RFO	1	2	2	-Internal audit to review	G
C5	HMRC requirements not met	Costs Litigation	RFO	1	3	3	-RFO to liaise as necessary	G
C6	Failure to comply with deadlines for accounts and returns	Poor auditor's report Reduction in confidence	RFO	1	2	2	- RFO to liaise with internal and external audit and ensure deadlines adhered to.	G
C7	Non-compliance with data protection	Litigation Poor reputation	Members Clerk/DPO	1	3	3	-Clerk to monitor - DPO nominated	G

### **Treasury Management policy**

Banbury Town Council has a policy to aim for six months costs included in the annual precept to be held in reserves. This means that we regularly have appropriate surplus funds available and it is important that such funds are invested prudently with due regard to the Council's fiduciary responsibility to the Council Tax payers and to the priority for security and liquidity of those investments.

The Town Council is required by the Local Government Act 2003 to determine an annual Investment Strategy. This strategy must be approved by the full Council but may be varied from time to time as circumstances dictate. The Strategy will be a public document as defined by the Freedom of Information Act 2000.

### **Investment Strategy**

All of the Town Council's investments will be Specified Investments which means that:

- a) All investments will be made in sterling and any payments or repayments will also be made in sterling, with UK registered institutions only.
- b) All investments will be short term investments not to exceed 12 month.
- c) All investments will be made with a body or an investment scheme which has been awarded a high credit rating by a credit rating agency
- d) A credit rating agency will be taken as one of the following

Standard and Poor's  
Moody's Investors Services Ltd  
Fitch Ratings Ltd

- e) Investments will remain in the UK mainland and will not invest in schemes that seek to avoid tax.

A high credit rating will be defined as 'A' 'High Credit Quality', referring to the Long Term grade issued in relation to an institution.

Credit ratings will be monitored regularly and if the rating falls consideration will be given at the next Council meeting of the appropriate action to be taken.

### **External Borrowing**

No borrowing approval is required for temporary loans or borrowing by way of an overdraft. However, in order to borrow to fund capital expenditure approval must first be given by the Department for Communities and Local Government. 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 the Department and NALC

### **Current External Borrowing**

The Council repaid all outstanding external loans within the year ending 31 March 2012. The Council does not anticipate any further external borrowing to be undertaken during 2022/23.

# **Oxfordshire Councils' Councillor Code of Conduct 2022**

**Adopted 18 May 2022**

## **1.0 Introduction**

The Council has duty to promote and maintain high standards of conduct by members and co-opted members of the Council, and formally adopt a code of conduct, in accordance with the *Localism Act 2011*.

## **2.0 Purpose of the Code of Conduct**

The purpose of this Code of Conduct is to assist you, as a Councillor, in modelling the behaviour that is expected of you, to provide a personal check and balance, and to set out the type of conduct that could lead to action being taken against you. It is also to protect you, the public, fellow Councillors, local authority officers and the reputation of local government. It sets out general principles of conduct expected of all Councillors and your specific obligations in relation to standards of conduct. The fundamental aim of the Code is to create and maintain public confidence in the role of the Councillor and in Local Government.

## **3.0 Definitions**

For the purposes of this Code of Conduct, a "Councillor" means a member or co-opted member of the local authority. A "co-opted member" is defined in the *Localism Act 2011 Section 27(4)* as "a person who is not a member of the authority but who

- 3.1 is a member of any committee or sub-committee of the authority, or;
- 3.2 is a member of, and represents the authority on, any joint committee or joint sub-committee of the authority;

and who is entitled to vote on any question that falls to be decided at any meeting of that committee or sub-committee".

## **4.0 General Principles of Councillor Conduct**

Everyone in public office and all who serve the public or deliver public services, including Councillors and local authority officers, should uphold the Seven Principles of Public Life, also known as the Nolan Principles, (see Appendix A).

Building on these principles of selflessness, objectivity, accountability, openness, honesty and integrity and leadership, the following general principles have been developed specifically for the role of Councillor.

In accordance with the public trust placed in Councillors, on all occasions a Councillor shall:

- act with integrity and honesty
- act lawfully
- treat all persons fairly and with respect; and
- lead by example and act in a way that secures public confidence in the

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- role of Councillor.
- impartially exercise their responsibilities in the interests of the local community
  - not improperly seek to confer an advantage, or disadvantage, on any person
  - avoid conflicts of interest
  - exercise reasonable care and diligence; and
  - ensure that public resources are used prudently in accordance with the local authority's requirements and in the public interest.

These general principles have been incorporated into the obligations of the Code of Conduct as set out below.

## **5.0 Application of the Code of Conduct**

This Code of Conduct applies to you as soon as you sign your declaration of acceptance of the office of Councillor or attend your first meeting as a co-opted member and continues to apply to you until you cease to be a Councillor.

This Code of Conduct applies to you when you are acting in your capacity as a Councillor which may include when:

- you misuse your position as a Councillor
- Your actions would give the impression to a reasonable member of the public with knowledge of all the facts that you are acting as a Councillor;

The Code applies to all forms of communication and interaction, including at face-to-face meetings, at online or telephone meetings, in written communication, in verbal communication, in non-verbal communication and in electronic and social media communication, posts, statements and comments.

Your Monitoring Officer has statutory responsibility for the implementation of the Code of Conduct, and you are encouraged to seek advice from your Monitoring Officer on any matters that may relate to the Code of Conduct. Town and parish Councillors are encouraged to seek advice from their Clerk, who may refer matters to the Monitoring Officer.

## **6.0 Standards of Councillor Conduct**

This section sets out the obligations (in bold below), which are the minimum standards of conduct required of a Councillor. Should a Councillor's conduct fall short of these standards, a complaint may be made against them, which may result in action being taken.

Guidance is also included below each obligation to help explain the reasons for the obligations and how they should be followed.

### **6.1 Respect**

#### **A Councillor:**

- 6.1.1 Shall treat everyone, including other Councillors and members of the public with respect.**

**6.1.2 Shall treat local authority employees, employees and representatives of partner organisations and those volunteering for the local authority with respect and respect the role they play.**

Respect means politeness and courtesy in behaviour, speech, and in the written word. Debate and having different views are all part of a healthy democracy. As a Councillor, you can express, challenge, criticise and disagree with views, ideas, opinions and policies in a robust but civil manner. You should not, however, subject individuals, groups of people or organisations to personal attack.

In your contact with the public, you should treat them politely and courteously. Rude and offensive behaviour lowers the public's expectations and confidence in Councillors.

In return, you have a right to expect respectful behaviour from everyone. If members of the public are being abusive, intimidatory or threatening you are entitled to stop any conversation or interaction in person or online and report them to the relevant social media provider and/or the police. This also applies to fellow councillors, where action could then be taken under the Councillor Code of Conduct, and local authority employees, where concerns should be raised in line with the local authority's councillor- officer protocol.

## **6.2 Bullying, Harassment and Discrimination**

### **A Councillor:**

**6.2.1 Shall not bully any person.**

**6.2.2 Shall not harass any person.**

**6.2.3 Shall promote equalities and not discriminate against any person.**

Bullying is offensive, intimidating, malicious or insulting behaviour, an abuse or misuse of power through means that undermine, humiliate, denigrate or injure the recipient. Bullying might be a regular pattern of behaviour or a one-off incident, happen face-to-face on social media, in emails or phone calls, happen in the workplace or at work social events and may not always be obvious or noticed by others.

The Protection from Harassment Act 1997 defines harassment as conduct that causes alarm or distress or puts people in fear of violence and must involve such conduct on at least two occasions. It can include repeated attempts to impose unwanted communications and contact upon a person in a manner that could be expected to cause distress or fear in any reasonable person.

Discrimination is where someone is treated unfairly because of a protected characteristic. Protected characteristics are specific aspects of a person's identity defined by the Equality Act 2010. They are age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

Legislation places specific duties on local authorities. Councillors have a central role to play in ensuring that equality issues are integral to the local authority's performance and strategic aims, and that there is a strong vision and public commitment to equality across public services.

### **6.3 Impartiality of Officers of the Council**

#### **A Councillor:**

- 6.3.1 Shall not compromise, or attempt to compromise, the impartiality of anyone who works for, or on behalf of, the local authority.**

Officers work for the local authority as a whole and must be politically neutral, (other than political assistants where applicable). They should not be coerced or persuaded to act in a way that would undermine their neutrality. A Councillor may question officers in order to understand, for example, their reasons for proposing to act in a particular way, or the content of a report that they have written. However, a Councillor must not try and force them to act differently, change their advice, or alter the content of that report, if doing so would prejudice their professional integrity.

### **6.4 Confidentiality and access to information**

#### **A Councillor:**

- 6.4.1 Shall not disclose information either given to them in confidence by anyone or acquired by them which they believe, or ought reasonably to be aware, is of a confidential nature, unless**
- i. They have received the consent of a person authorised to give it; or**
  - ii. They are required by law to do so; or**
  - iii. the disclosure is made to a third party for the purpose of obtaining professional legal advice provided that the third party agrees not to disclose the information to any other person; or**
  - iv. the disclosure is reasonable and in the public interest; and also made in good faith and in compliance with the reasonable requirements of the local authority and consultation with the Monitoring Officer has taken place prior to its release.**
- 6.4.2 Shall not improperly use knowledge gained solely as a result of their role as a Councillor for the advancement of themselves, their friends, family members, employer or business interests.**
- 6.4.3 Shall not prevent anyone from getting information that they are entitled to by law.**
- 6.4.4 When making decisions on behalf of, or as part of, the Council shall have due regard to any professional advice provided by the Council's Officers.**

## **6.5 Disrepute**

### **A Councillor:**

#### **6.5.1 Shall not bring their role or local authority into disrepute.**

As a Councillor, you are trusted to make decisions on behalf of your community and your actions and behaviour are subject to greater scrutiny than that of ordinary members of the public. You should be aware that your actions might have an adverse impact on you, other Councillors and/or your local authority and may lower the public's confidence in your or your local authority's ability to discharge your/its functions.

## **6.6 Use of position**

### **A Councillor:**

#### **6.6.1 Shall not use, or attempt to use, their position improperly to the advantage or disadvantage of anyone.**

A Councillor should not take advantage of opportunities, responsibilities and privileges to further their own or others' private interests or to disadvantage anyone unfairly.

## **6.7 Local authority Resources and Facilities**

### **A Councillor:**

#### **6.7.1 Shall not misuse council resources.**

#### **6.7.2 Shall, when using the resources of the local authority or authorising their use by others, act in accordance with the local authority's requirements; and ensure that such resources are not used for political purposes unless that use could reasonably be regarded as likely to facilitate, or be conducive to, the discharge of the functions of the local authority or of the office to which they have been elected or appointed.**

A Councillor may be provided with resources and facilities by the local authority to assist them in carrying out their duties as a Councillor. Examples may include office support, stationery, equipment such as phones, computers and transport and access and use of local authority buildings and rooms.

## **6.8 Compliance with the Code of Conduct**

### **A Councillor:**

#### **6.8.1 Shall undertake Code of Conduct training as required by the local authority.**

#### **6.8.2 Shall cooperate with any Code of Conduct assessment,**

**investigation, hearing and/or determination.**

**6.8.3 Shall not intimidate or attempt to intimidate any person who is likely to be involved with the administration of any investigation or proceedings.**

**6.8.4 Shall comply with any sanction imposed on them following a finding that they have breached the Code of Conduct.**

It is extremely important for a Councillor to demonstrate high standards, to have your actions open to scrutiny and not to undermine public trust in the local authority or its governance. If you do not understand or are concerned about the local authority's processes in handling a complaint you should raise this with the Monitoring Officer.

## **7.0 Registering and Declaring Interests**

You need to register your interests so that the public, local authority employees and fellow councillors know which of your interests might give rise to a conflict of interest. The register is a public document that can be consulted when (or before) an issue arises. The register also protects you by allowing you to demonstrate openness and a willingness to be held accountable. You are personally responsible for deciding whether or not you should disclose an interest in a meeting, but it can be helpful for you to know early on if others think that a potential conflict might arise. It is also important that the public know about any interest that might have to be disclosed by you or other councillors when making or taking part in decisions, so that decision making is seen by the public as open and honest. This helps to ensure that public confidence in the integrity of local governance is maintained.

### **7.1 Disclosable Pecuniary Interests**

A Councillor must, within 28 days of taking office as a member or co-opted member, notify the Council's Monitoring Officer of any disclosable pecuniary interest as defined by regulations made by the Secretary of State (see Appendix B), where the pecuniary interest is yours, your spouse's or civil partner's, or is the pecuniary interest of somebody with whom you are living with as a husband or wife, or as if you were civil partners. Section 29 of the Localism Act 2011 requires the Monitoring Officer to establish and maintain a register of interests of members of the authority.

You must disclose the interest at any meeting of the Council at which you are present, where you have a disclosable interest in any matter being considered and where the matter is not a 'sensitive interest'. If it is a 'sensitive interest', you must disclose the fact that you have an interest but do not have to disclose the nature of it. (A sensitive interest is an interest which, in the opinion of the Monitoring Officer, if disclosed, could lead to the Councillor, or a person connected with them, being subjected to violence or intimidation.) You are personally responsible for deciding whether or not you should disclose an interest in a meeting.

Following any disclosure of an interest not on the Council's register, or the

subject of pending notification, you must notify the Monitoring Officer of the interest within 28 days beginning with the date of disclosure.

Unless dispensation has been granted, by the Monitoring Officer, you may not participate in any discussion of, or vote on, or discharge any function related to any matter in which you have a disclosable pecuniary interest. You must withdraw from the room or chamber when the meeting discusses and votes on the matter.

Where you have a disclosable pecuniary interest on a matter to be considered or being considered by you as an Executive member in exercise of your executive function, you must notify the Monitoring Officer of the interest and must not take any steps or further steps in the matter apart from arranging for someone else to deal with it.

You must ensure that your register of interests is kept up to date and within 28 days of becoming aware of any new interest, or of any change to a registered interest, notify the Monitoring Officer.

You should note that failure to register or disclose a disclosable pecuniary interest as set out in Appendix B is a criminal offence under the Localism Act 2011.

## 7.2 Other Registerable Interests

You must also register your other registerable interests with the Monitoring Officer within 28 days of taking office and ensure these are kept up to date by notifying any changes within 28 days.

Where a matter arises at a meeting which **directly relates** to the financial interest or wellbeing of one of your Other Registerable Interests (as set out in Appendix C), you must disclose the interest. Wellbeing can be described as a condition of contentedness, healthiness and happiness; anything that could be said to affect a person's quality of life, either positively or negatively, is likely to affect their wellbeing. You may speak on the matter only if members of the public are also allowed to speak at the meeting but otherwise must not take part in any discussion or vote on the matter and must not remain in the room unless you have been granted a dispensation. If it is a 'sensitive interest', you do not have to disclose the nature of the interest.

Where you have an Other Registerable Interest on a matter to be considered or is being considered by you as an Executive member in exercise of your executive function, you must notify the Monitoring Officer of the interest and must not take any steps or further steps in the matter apart from arranging for someone else to deal with it.

## 7.3 Non-Registerable Interests

Where a matter arises at a meeting which **directly relates** to your financial

interest or wellbeing (and does not fall under disclosable pecuniary interests at 7.1 above), or the financial interest or wellbeing of a relative or close associate, you must disclose the interest. You may speak on the matter only if members of the public are also allowed to speak at the meeting but otherwise must not take part in any discussion or vote on the matter and must not remain in the room unless you have been granted a dispensation. If it is a sensitive interest you do not have to disclose the nature of the interest.

Where a matter arises at a meeting which **affects** your own financial interest or wellbeing, a financial interest or wellbeing of a relative or close associate or a financial interest or wellbeing of a body included under Other Registrable Interests as set out at 7.2 above and appendix C you must disclose the interest. In order to determine whether you can remain in the meeting after disclosing your interest the following test should be applied:

Where a matter affects the financial interest or well-being:

- a. to a greater extent than it affects the financial interests of the majority of inhabitants of the ward affected by the decision and;
- b. a reasonable member of the public knowing all the facts would believe that it would affect your view of the wider public interest

You may speak on the matter only if members of the public are also allowed to speak at the meeting. Otherwise you must not take part in any discussion or vote on the matter and must not remain in the room unless you have been granted a dispensation. If it is a 'sensitive interest', you do not have to disclose the nature of the interest.

Where you have a Non-Registerable Interest on a matter to be considered or is being considered by you as an Executive member in exercise of your executive function, you must notify the Monitoring Officer of the interest and must not take any steps or further steps in the matter apart from arranging for someone else to deal with it.

## **8.0 Gifts and Hospitality**

### **A Councillor:**

- 8.1 Shall not accept gifts or hospitality, irrespective of estimated value, which could give rise to real or substantive personal gain or a reasonable suspicion of influence to show favour from persons seeking to acquire, develop or do business with the local authority or from persons who may apply to the local authority for any permission, licence or other significant advantage.**
- 8.2 Shall register with the Monitoring Officer any gift or hospitality with an estimated value of at least £50 within 28 days of its receipt.**
- 8.3 Shall register with the Monitoring Officer any significant gift or hospitality that they have been offered but have refused to accept.**

The presumption should always be not to accept significant gifts or hospitality but

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there may be times when such a refusal may be difficult if it is seen as rudeness in which case you could accept it but must ensure it is publicly registered.

You do not need to register gifts and hospitality which are not related to your role as a Councillor.

It is appropriate to accept normal expenses and hospitality associated with your duties as a Councillor.

## **Appendices**

### **Appendix A – The Seven Principles of Public Life**

The principles are:

#### **Selflessness**

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

#### **Integrity**

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

#### **Objectivity**

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

#### **Accountability**

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

#### **Openness**

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

#### **Honesty**

Holders of public office should be truthful.

#### **Leadership**

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

## Appendix B: Disclosable Pecuniary Interests

“**Disclosable Pecuniary Interest**” means an interest of yourself, or of your partner if you are aware of your partner's interest, within the descriptions set out in the table below.

“**Partner**” means a spouse or civil partner, or a person with whom you are living as husband or wife, or a person with whom you are living as if you are civil partners.

This table sets out the explanation of Disclosable Pecuniary Interests as set out in the [Relevant Authorities \(Disclosable Pecuniary Interests\) Regulations 2012](#).

<b>Subject</b>	<b>Description</b>
<b>Employment, office, trade, profession or vocation</b>	Any employment, office, trade, profession or vocation carried on for profit or gain.
<b>Sponsorship</b>	Any payment or provision of any other financial benefit (other than from the council) made to the councillor during the previous 12-month period for expenses incurred by him/her in carrying out his/her duties as a councillor, or towards his/her election expenses.  This includes any payment or financial benefit from a trade union within the meaning of the Trade Union and Labour Relations (Consolidation) Act 1992.
<b>Contracts</b>	Any contract made between the councillor or his/her spouse or civil partner or the person with whom the councillor is living as if they were spouses/civil partners (or a firm in which such person is a partner, or an incorporated body of which such person is a director* or a body that such person has a beneficial interest in the securities of*) and the council — (a) under which goods or services are to be provided or works are to be executed; and (b) which has not been fully discharged.

<b>Land and Property</b>	<p>Any beneficial interest in land which is within the area of the council.</p> <p>'Land' excludes an easement, servitude, interest or right in or over land which does not give the councillor or his/her spouse or civil partner or the person with whom the councillor is living as if they were spouses/ civil partners (alone or jointly with another) a right to occupy or to receive income.</p>
<b>Licenses</b>	<p>Any licence (alone or jointly with others) to occupy land in the area of the council for a month or longer</p>
<b>Corporate tenancies</b>	<p>Any tenancy where (to the councillor's knowledge)—</p> <p>(a) the landlord is the council; and</p> <p>(b) the tenant is a body that the councillor, or his/her spouse or civil partner or the person with whom the councillor is living as if they were spouses/ civil partners is a partner of or a director* of or has a beneficial interest in the securities* of.</p>
<b>Securities</b>	<p>Any beneficial interest in securities* of a body where—</p> <p>(a) that body (to the councillor's knowledge) has a place of business or land in the area of the council; and</p> <p>(b) either—</p> <p>(i) the total nominal value of the securities* exceeds £25,000 or one hundredth of the total issued share capital of that body; or</p> <p>(ii) if the share capital of that body is of more than one class, the total nominal value of the shares of any one class in which the councillor, or his/ her spouse or civil partner or the person with whom the councillor is living as if they were spouses/civil partners have a beneficial interest exceeds one hundredth of the total issues share capital of that class.</p>

\* 'Director' includes a member of the committee of management of an industrial and provident society.

\* 'securities' means shares, debentures, debenture stock, loan stock, bonds, units of a collective investment scheme within the meaning of the Financial Services and Markets Act 2000 and other securities of any description, other than money deposited with a building society.

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## **Appendix C: Disclosure of Other Registrable Interests**

You must register as an Other Registrable Interest:

- a) any unpaid directorships
- b) any Body of which you are a member or are in a position of general control or management and to which you are nominated or appointed by your authority
- c) any Body
  - (i) exercising functions of a public nature
  - (ii) directed to charitable purposes or
  - (iii) one of whose principal purposes includes the influence of public opinion or policy (including any political party or trade union)of which you are a member or in a position of general control or management