

04 September 2025

Under the Openness of Local Government Bodies Regulations 2014, members of the public, the press or the Council may record or film or photograph or broadcast the meeting whilst it is open to the public.



**To Members of the Council**

Dear Sir/Madam

You are hereby summoned to a meeting of the **STRATEGY & REVIEW COMMITTEE**  
(Cllrs: Butterick, Fraser, Guilfoyle, Morse, Woodhead)  
which will be held in the Greenwood Room, Hebden Bridge Town Hall on  
**Wednesday 10 September 2025 at 7.30pm**

Emma Green  
Clerk to the Council

This meeting is open to the public unless Members decide to exclude the public for any exempt or confidential item of business.

**AGENDA**

1. **To elect a Chair and Deputy Chair for the Strategy & Review Committee for the council year 2025-26.**
2. **To receive apologies for absence and any substitutions.**
3. **To receive members' interests relating to agenda items for this meeting.**
4. **MINUTES OF THE MEETING HELD 7 MAY 2025**  
To report on matters arising from the minutes of the meeting held 15 January not itemised on this agenda. (enc)
5. **TERMS OF REFERENCE**  
To review the Terms of Reference of this committee and decide on actions (enc).
6. **MEMBERSHIP OF THE COMMITTEE**  
To consider the membership of the committee and to decide on actions as appropriate.
7. **GENERAL DATA PROTECTION REGULATIONS - COMPLIANCE & POLICY**  
To consider draft policies in relation to data and privacy and to decide on actions as appropriate (enc).
8. **RECORDING OF HRTC MEETINGS**  
To consider the recording of all full council meetings, review proposed guidelines, and decide on actions as appropriate.

**9. CIVILITY & RESPECT PLEDGE**

To consider signing the Civility & Respect Pledge to demonstrate the councils commitment to fostering positive changes that support civil and respectful conduct (enc).

**10. INVESTMENTS & RESERVES**

To consider the CCLA (Churches, Charities & Local Authorities) Public Sector Deposit Fund as a investment option for HRTC in line with the investment policy (enc).

**11. EXCLUSION OF THE PRESS AND PUBLIC**

To resolve to exclude members of the public and press under the Public Bodies (Admissions to Meetings) Act 1960 during consideration of items of a confidential nature.

**HEBDEN ROYD TOWN COUNCIL**

**MEETING of the STRATEGY & REVIEW COMMITTEE  
held Wednesday, 7 May 2025**

**MINUTES**

**PRESENT** Councillors; Guilfoyle, Hoyle, Morse and Woodhead.

Town Clerk: Emma Green

**524. To receive apologies for absence and any substitutions.**  
Apologies were received from Cllrs Butterick and Hedges

**525. To receive members interests relating to agenda items for this meeting.**  
There were no interests received at this meeting.

**526. MINUTES OF THE MEETING HELD 15 JANUARY 2025**  
**RESOLVED:** There were no matters arising.

**527. BUDGET 2025 - 26**  
The budget was presented for review.  
**RESOLVED:** To note the information

**528. GOVERNANCE REVIEW**  
A report was received from Local Council Consultancy, previously appointed to conduct a high-level Governance Review of Hebden Royd Town Council.  
**RESOLVED:** to note the report and the actions presented and that the clerk has already stated to implement the recommendations.

**529. FREEDOM OF INFORMATION & DATA PROTECTION**  
The committee considered how Freedom of Information Requests were processed by HRTC, including the responsibilities relating to GDPR, training, review and development of appropriate policy and/or support from and external consultant. The protection of the Town Council is a priority.  
**RESOLVED:** That the Town Council would benefit from the expertise of a retained consultant who can advise the set up the relevant policy and procedures. They will also act as Data Protection Officer and handle all FOI requests. Based on the quote received committee approves £5000.00 for works to undertake the policy review and up to £200 monthly for the appointment of an external DPO. The Town Clerk will obtain two further quotes and will make an appointment.

**530. RENEWABLE ENGERY**

Information relating to the proposed development of Calderdale Energy Park was considered.

**RESOLVED:** At this stage the council will continue to attend appropriate meetings and gather information in respect of the proposals. The Town Council will also share information and encourage members of the public to engage in consultation. At an appropriate time, the matter will be considered by the Full Council for a position to be confirmed.

**531. STANDING ORDERS**

To consider the revised Model Standing Orders and to decide on actions as appropriate.

**RESOLVED:** To adopt the revised Model Standing Orders for 2025, and to approve the automatic adoption of the model standing orders as published by NALC in the future.

**532. FINANCIAL REGULATIONS**

The statutory amends in respect of the Procurement Act 2024 were considered.

**RESOLVED:** approved to adopt the revised Financial Regulations. In respect of 5.6. the wording shall state...*For contracts estimated to exceed £60,000 including VAT, the Clerk shall seek formal tenders from at least three suppliers agreed by the council. Tenders shall be invited in accordance with Appendix 1.*

**533. AUDIT 2024-25**

It was reported that the draft report from the Town Councils own external auditor had been received. The committee were advised that the council had now moved to income and expenditure accounting rather than payments and receipts accounting, in accordance with the Smaller Authorities' Proper Practices Panel (SAPPP) Practitioners Guide. This is retrospective and as such adjustments will need to be made for the last two years of accounts.

**RESOLVED:** It was noted that the adjustments to the accounts will take some time, and the Annual Governance and Accountability Return will be ready for submission in June. In respect of the draft report, it was noted that there are a number of low to medium priority actions to be completed, some of which date back to previous reports. The clerk will action these in due course.

**534. EXCLUSION OF THE PRESS AND PUBLIC**

There was no motion to exclude the press and public.

Meeting finished at 9pm.



## **STRATEGY & REVIEW COMMITTEE TERMS OF REFERENCE**

**Membership:** Minimum of 5 Maximum of 7 Councillors and Ex-officio

**Non-councillor:** Non councillors are not elected to this committee.

**Quorum:** Three Town Councillors with voting rights

**Meetings:** Four meetings per year (or as required)

### **1. Introduction**

- 1.1 The aim of the Strategy & Committee is to manage the internal audit of the Council's financial and procedural issues.
- 1.2 The Strategy & Review Committee has delegated powers to act on behalf of the Full Council in relation to the defined terms of reference. Any recommendations outside these terms of reference shall be made to the Full Council.
- 1.3 The Strategy & Review Committee shall be administered and managed in accordance with these Terms of Reference and the Council's Standing Orders.

### **2. Membership**

- 2.1 The Strategy & Review Committee shall consist of at least five and up to seven Town Councillors. These shall be the chair of each committee and appointments made by the committee.
- 2.2 The Mayor is ex-officio on this committee.
- 2.3 Three members of the Committee shall constitute a quorum.

- 2.4 The Chair and Deputy Chair are to be elected annually at the first meeting of this committee.
- 2.5 In the event of the resignation, death or disqualification of a Councillor during the year any vacancy on the Strategy & Review Committee will be filled at the next meeting of the Full Council.
- 2.6 Substitutions are not permitted in the event of a member's absence from a meeting of the Strategy & Review Committee.

### **3. Meetings**

- 3.1 The Town Clerk will call Strategy & Review Committee meetings as necessary and in accordance with the approved schedule of meeting dates.
- 3.2 Members will be summoned to attend meetings which will usually be held in Hebden Royd Town Hall. Non-Members of the Committee may attend in their capacity as a Councillor but will have no more rights at Committee meetings than members of the public.
- 3.3 Public notice of meetings shall be given in accordance with Schedule 12, Paragraph 10(2) of the Local Government Act 1972.
- 3.4 Members of the public may attend but shall not be permitted to take part in meetings of the Strategy & Review Committee.

### **4. Documentation**

- 4.1 The minutes of all meetings will be taken by the Town Clerk and circulated for approval at Full Council meetings.
- 4.2 All correspondence shall be conducted through the Town Clerk.

### **5. Scope**

- 5.1 To review and monitor the income and expenditure of the Council as a whole.
- 5.2 To prepare, in collaboration with the Clerk/RFO, and recommend the annual draft budget to the Full Council.
- 5.6 To recommend the draft precept to the Full Council.

- 5.7 To oversee & scrutinise expenditure, within budget, on budgets not specifically managed by other committees
- 5.8 To vire funds between budget allocations.
- 5.9 To review the Internal Audit and External Audit reports, make recommendations to Full Council and oversee the implementation of any required actions.
- 5.10 To draw up and annually review a reserves strategy for the Full Council's approval.
- 5.11 To review policies and procedures relating to financial and governance matters to ensure that they are compliant with statutory requirements and best practice and make recommendations thereon to the Full Council.
- 5.12 To scrutinise and make recommendation on proposals and fees for services.
- 5.13 To have oversight of GDPR concerns and to review Freedom of Information and SARS requests, and to form a working group to conduct internal reviews as required.

## **6. Review**

- 6.1 The Strategy & Review Committee's Terms of Reference are to be reviewed annually at the first meeting of the committee.

## DIGNITY AT WORK POLICY

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**[Council] believes that civility and respect are important in the working environment, and expect all councillors, officers and the public to be polite and courteous when working for, and with the council.**

### **Purpose**

**[Council] is committed to creating a working environment where all council employees, councillors, contractors and others who come into contact with us in the course of our work, are treated with dignity, respect and courtesy. We aim to create a workplace where there is zero tolerance for harassment and bullying**

**[Optional – for Councils who have committed to the pledge]** In support of this objective, [Council] has signed up to the Civility Pledge, as a commitment to civility and respect in our work, and politeness and courtesy in behaviour, speech, and in the written word. Further information about the Civility and Respect Pledge is available [NALC & SLCC](#)

We recognise that there is a continuum where unaddressed issues have the potential to escalate and become larger, more complex issues and this policy sets out how concerns will be managed however the emphasis of this policy is on resolution and mediation where appropriate, rather than an adversarial process.

This document:

- explains how we will respond to complaints of bullying or harassment;
- ensures that we respond sensitively and promptly; and,
- supports our employees in ensuring their behaviour does not amount to bullying and/or harassment by giving examples.

### **Scope**

This policy covers bullying and harassment of and by clerks/chief officers and all employees engaged to work at [Council]. Should agency staff, or contractors have a complaint connected to their engagement with [Council] this should be raised to their nominated contact, manager, or the Chair of the Council, in the first instance. Should the complaint be about the chair of the council the complaint should be raised to the deputy chair / council's personnel / staffing committee.

Agency staff, or contractors are equally expected to treat council colleagues, and other representatives and stakeholders with dignity and respect, and the council may terminate the contract, without notice, where there are suspicions of harassment or bullying.

Complaints about other employment matters will be managed under the council's grievance policy.

It is noted that the management of a situation may differ depending on who the allegations relate to (e.g. employees, contractor, councillor), however, the council will take appropriate action if any of its employees are bullied or harassed by employees, councillors, members of the public, suppliers or contractors.



### **The position on bullying and harassment**

All staff and council representatives are entitled to dignity, respect and courtesy within the workplace and to not experience any form of discrimination. [Council] will not tolerate bullying or harassment in our workplace or at work-related events outside of the workplace, whether the conduct is a one-off act or repeated course of conduct, and whether harm is intended or not. Neither will we tolerate retaliation against, or victimisation of, any person involved in bringing a complaint of harassment or bullying. You should also be aware that, if you have bullied or harassed someone (e.g. physical violence, harassment), in some circumstances the treatment may amount to a crime punishable by a fine or imprisonment.

We expect all representatives of the council to treat each other with respect and uphold the values of the code of conduct, [civility and respect pledge], equality opportunities policy, and all other policies and procedures set by the Council.

We expect you to demonstrate respect by listening and paying attention to others, having consideration for other people's feelings, following protocols and rules, showing appreciation and thanks, and being kind.

Allegations of bullying and harassment will be treated seriously. Investigations will be carried out promptly, sensitively and, as far as possible, confidentially. See the grievance policy for further details regarding the process. Employees and others who make allegations of bullying or harassment in good faith will not be treated less favourably as a result.

False accusations of harassment or bullying can have a serious effect on innocent individuals. Staff and others have a responsibility not to make false allegations. While we will assume that all complaints of bullying and harassment are made in good faith, in the event that allegations are found to be malicious or vexatious the person raising the complaint may be subject to action under the council's disciplinary procedure.

#### **Harassment**

- Where a person is subject to uninvited conduct that violates their dignity, in connection with a protected characteristic
- Behaviour that creates a hostile, humiliating, degrading or similarly offensive environment in relation to a protected characteristic

#### **Bullying**

- Behaviour that leaves the victim feeling threatened, intimidated, humiliated, vulnerable or otherwise upset. It does not need to be connected to a protected characteristic.

### **What Type of Treatment amounts to Bullying or Harassment?**

'Bullying' or 'harassment' are phrases that apply to treatment from one person (or a group of people) to another that is unwanted and that has the effect of violating that person's dignity or creating an intimidating, hostile, degrading, humiliating, or offensive environment for that person.

Examples of bullying and harassment include:

- Physical conduct ranging from unwelcome touching to serious assault
- Unwelcome sexual advances
- The offer of rewards for going along with sexual advances e.g. promotion, access to training
- Threats for rejecting sexual advances
- Demeaning comments about a person's appearance
- Verbal abuse or offensive comments, including jokes or pranks related to age, disability, gender re-assignment, marriage, civil partnership, pregnancy, maternity, race, religion, belief, sex or sexual orientation
- Unwanted nicknames, especially related to a person's age, disability, gender re-assignment, marriage, civil partnership, pregnancy, maternity, race, religion, belief, sex or sexual orientation
- Spreading malicious rumours or insulting someone
- Lewd or suggestive comments or gestures
- Deliberate exclusion from conversations, work activities or social activities.
- Withholding information a person needs in order to do their job
- Practical jokes, initiation ceremonies or inappropriate birthday rituals
- Physical abuse such as hitting, pushing or jostling
- Rifling through, hiding or damaging personal property
- Display of pictures or objects with sexual or racial overtones, even if not directed at any particular person
- Isolation or non-cooperation at work
- Subjecting a person to humiliation or ridicule, belittling their efforts, whether directly and / or in front of others
- The use of obscene gestures
- Abusing a position of power

Bullying and harassment can occur through verbal and face to face interactions, but can also take place through sharing inappropriate or offensive content in writing or via email and other electronic communications and social media.

It is important to recognise that conduct which one person may find acceptable, another may find totally unacceptable and behaviour could be harassment when the person had no intention to offend. We all have the right to determine what offends us. Some behaviour will be clear to any reasonable person that it is likely to offend – for example sexual touching. Other examples may be less clear, however, you should be aware that harassment will occur if behaviour continues after the recipient has advised you that the behaviour is unacceptable to them.

Harassment can also occur where the unwanted behaviour relates to a perceived characteristic ( such as offensive jokes or comments based on the assumption someone is gay, even if they are not) or due

to their association with someone else (such as harassment related to their partner having a disability for example). See the council's equality and diversity Policy.

All employees must, therefore, treat their colleagues with respect and appropriate sensitivity and should feel able to challenge behaviour that they find offensive even if it is not directed at them.

It is important to recognise that bullying does not include appropriate criticism of an employee's behaviour or effective, robust performance management. Constructive and fair feedback about your behaviour or performance from your manager or colleagues/Councillors is not bullying. It is part of normal employment and management routines, and should not be interpreted as anything different.

### **Victimisation**

Victimisation is subjecting a person to a detriment because they have, in good faith, complained (whether formally or otherwise) that someone has been bullying or harassing them or someone else, or supported someone to make a complaint or given evidence in relation to a complaint. This would include isolating someone because they have made a complaint or giving them a heavier or more difficult workload.

Provided that you act in good faith, i.e. you genuinely believe that what you are saying is true, you have a right not to be victimised for making a complaint or doing anything in relation to a complaint of bullying or harassment and the council will take appropriate action to deal with any alleged victimisation, which may include disciplinary action against anyone found to have victimised you.

Making a complaint that you know to be untrue, or giving evidence that you know to be untrue, may lead to disciplinary action being taken against you.

### **Reporting Concerns**

#### **What you should do if you feel you are being bullied or harassed by a member of the public or supplier (as opposed to a colleague)**

If you are being bullied or harassed by someone with whom you come into contact at work, please raise this with your nominated manager in the first instance or, with the clerk/or a councillor. Any such report will be taken seriously, and we will decide how best to deal with the situation, in consultation with you.

**What you should do if you feel you are being bullied or harassed by a councillor:** If you are being bullied or harassed by a councillor, please raise this with the clerk/chief officer or the chair of the council in the first instance. They will then decide how best to deal with the situation, in consultation with you. There are two possible avenues for you, informal or formal. The Informal Resolution is described below. Formal concerns regarding potential breaches of the Councillors Code of Conduct must be investigated by the Monitoring Officer.

The council will consider reasonable measures to protect your health and safety. Such measures may include a temporary change in duties or change of work location, not attending meetings with the person about whom the complaint has been made etc.

**What you should do if you witness an incident you believe to harassment or bullying:** If you witness such behaviour you should report the incident in confidence to the clerk/chief officer or a councillor. Such reports will be taken seriously and will be treated in strict confidence as far as it is possible to do so.

**What you should do if you are being bullied or harassed by another member of staff:** If you are being bullied or harassed by a colleague or contractor, there are two possible avenues for you, informal or formal. These are described below.

#### Informal resolution

If you are being bullied or harassed, you may be able to resolve the situation yourself by explaining clearly to the perpetrator(s) that their behaviour is unacceptable, contrary to the council's policy and must stop. Alternatively, you may wish to ask the clerk/chief officer, your nominated manager or a colleague to put this on your behalf or to be with you when confronting the perpetrator(s).

If the above approach does not work or if you do not want to try to resolve the situation in this way, or if you are being bullied by your own nominated manager, you should raise the issue with the chair of the council. (If your concern relates to the chair, you should raise it with the chair of the personnel/staffing committee). The chair (or another appropriate person) will discuss with you the option of trying to resolve the situation informally by telling the alleged perpetrator, without prejudicing the matter, that:

- there has been a complaint that their behaviour is having an adverse effect on a member of the council staff
- such behaviour is contrary to our policy
- for employees, the continuation of such behaviour could amount to a serious disciplinary offence

It may be possible for this conversation to take place with the alleged perpetrator without revealing your name, if this is what you want. The person dealing with it will also stress that the conversation is confidential.

In certain circumstances we may be able to involve a neutral third party (a mediator) to facilitate a resolution of the problem. The chair (or another appropriate person) will discuss this with you if it is appropriate.

If your complaint is resolved informally, the alleged perpetrator(s) will not usually be subject to disciplinary sanctions. However, in exceptional circumstances (such as extremely serious allegation or in cases where a problem has happened before) we may decide to investigate further and take more formal action notwithstanding that you raised the matter informally. We will consult with you before taking this step.

### Raising a formal complaint

If informal resolution is unsuccessful or inappropriate, you can make a formal complaint about bullying and harassment through the council's grievance procedure. You should raise your complaint to the clerk/chief officer or the chair of the council. A formal complaint may ultimately lead to disciplinary action against the perpetrator(s) where they are employed.

The clerk/chief officer or the chair of the council will appoint someone to investigate your complaint in line with the grievance policy. You will need to co-operate with the investigation and provide the following details (if not already provided):

- The name of the alleged perpetrator(s),
- The nature of the harassment or bullying,
- The dates and times the harassment or bullying occurred,
- The names of any witnesses and
- Any action taken by you to resolve the matter informally.

The alleged perpetrator(s) would normally need to be told your name and the details of your grievance in order for the issue to be investigated properly. However, we will carry out the investigation as confidentially and sensitively as possible. Where you and the alleged perpetrator(s) work in proximity to each other, we will consider whether it is appropriate to make temporary adjustments to working arrangements whilst the matter is being investigated.

Where your complaint relates to potential breaches of the Councillors Code of Conduct, these will need to be investigated by the Monitoring Officer. The council will consider any adjustments to support you in your work and to manage the relationship with the councillor the allegations relate to, while the investigation proceeds.

Investigations will be carried out promptly (without unreasonable delay), sensitively and, as far as possible, confidentially. When carrying out any investigations, we will ensure that individuals' personal data is handled in accordance with the data protection policy.

The council will consider how to protect your health and wellbeing whilst the investigation is taking place and discuss this with you. Depending on the nature of the allegations, the Investigator may want to meet with you to understand better your complaint (see the grievance policy for further information, and details of your right to be accompanied).

After the investigation, a panel will meet with you to consider the complaint and the findings of the investigation in accordance with the grievance procedure. At the meeting you may be accompanied by a fellow worker or a trade union official.

Following the conclusion of the hearing the panel will write to you to inform you of the decision and to notify you of your right to appeal if you are dissatisfied with the outcome. You should put your appeal in writing explaining the reasons why you are dissatisfied with the decision. Your appeal will be heard under the appeal process that is described in the grievance procedure.

### **The use of the Disciplinary Procedure**

If at any stage from the point at which a complaint is raised, we believe there is a case to answer and a disciplinary offence might have been committed, we will instigate our disciplinary procedure. We will keep you informed of the outcome.

*This is a non-contractual policy and procedure which will be reviewed from time to time.*

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### **GUIDANCE FOR USING THE DIGNITY AT WORK POLICY**

This is an example of an employment policy designed for a council adhering to statutory minimum requirements and does not constitute legal advice. As with all policies it should be consistent with your terms and conditions of employment.

This guidance is provided to support understanding of the policy, and its application, as well as where local adaptations may be required. The guidance is not part of the policy and should be removed from the policy adopted and shared with council employees.

The Dignity at Work Policy will replace a previous 'Bullying and Harassment' Policy, to create a policy that is focussed on encompassing behaviours beyond simply bullying and harassment, and zero tolerance with the aim of dealing with concerns before they escalate. It is important that any commitment made in the policy is applied in practice.

Wording has been suggested to demonstrate a council's commitment to promoting dignity and respect where they have signed up to the NALC, SLCC and OVW Civility and Respect Pledge. Council's that have not signed up to this are requested to consider making this pledge which is based on basic behaviours and expectations of all council representatives to create workplaces that allow people to maintain their dignity at all times. If your council has not agreed to the pledge this wording should be removed.

The policy is drafted with consideration of employment language and terminology that is reflective of a modern working environment, setting a tone that is engaging, collaborative and inclusive. A council may want to update references where relevant to reflect local terminology and structure, however should be considerate of equality, diversity and inclusion.

The examples of bullying and harassment are just that – examples. This should not be considered an exhaustive list.

### **Notes:**

#### **Protected Characteristics**

A 'protected characteristic' is defined in the Equality Act 2010 as age, disability, sex, gender reassignment, pregnancy and maternity, race, sexual orientation, religion or belief, and marriage and civil partnership. It is unlawful to discriminate against an individual because of any of the protected characteristics.

Discrimination includes treating people differently because of a protected characteristic. Employees can complain of harassment even if the behaviour in question is not directed at them. This is because the complainant does not actually need to possess the relevant protected characteristic. An employee can complain of unlawful harassment if they are related someone with a protected characteristic, or because a colleague believes they have a protected characteristic.

Examples of harassment related to a protected characteristic could include;

- Making assumptions about someone's ability due to their **age**, or denying development opportunities to someone based on their age. This could also include assumptions about their lifestyle or making inappropriate jokes related to age.
- Making fun or mimicking impairments related to a health condition, or using inappropriate language about disabilities. Constantly selecting social activities that make it impossible for a colleague with a **disability** to participate in.
- Refusing to treat a person as their new gender, or disclosing information about their gender identity could be harassment on the grounds of **gender reassignment**.
- **Pregnancy/Maternity** harassment could include refusing opportunities due to pregnancy or maternity leave, or inappropriate touching and invasion of personal space such as unwanted touching of a pregnant person's stomach.
- Harassment based on **race** could include derogatory nicknames, or stereotyping based on ethnicity. It could include racist comments or jokes, or assumptions about someone's lifestyle based on their ethnicity.
- **Gender** harassment could include not considering people for a job based on gender stereotyping roles, or implementing practices that disadvantage one gender over another. Rude, explicit jokes, even if not directed at an individual, or comments on individuals' dress or appearance.
- Regularly arranging team meals over periods of fasting or religious occasions or failing to adjust a dress code to accommodate religious dress could be examples of harassment based on **religion/belief**.
- Excluding same sex partners from social events could be both **sexual orientation** and **marriage/civil partnership** discrimination, as could not offering the same work-related benefits.

A person does not need to be employed or have 2 years qualifying service to make a discrimination claim at a tribunal.

- Job applicants who believe they have not been appointed because of a 'protected characteristic' can make a claim.
- New or established employees who are dismissed, or treated unreasonably because of a health condition can make a discrimination claim.
- An employee subjected to harassment can make a discrimination claim at a tribunal.
- An employee asked to retire can make a discrimination claim at a tribunal.

### **Legal risks**

Successful unfair dismissal claims are limited to a compensation cap, whereas those for unlawful discrimination have no cap.

A positive employment culture, and swift action if conduct falls beneath acceptable standards will help mitigate the risks. An unhealthy culture will make it difficult to defend claims.

The time to defend and the cost of defending tribunal claims can be significant, irrespective of the outcome.

### **Culture and behaviour**

We work in eclectic communities and working environments, and a positive culture within the council enables employees with different backgrounds and beliefs to share ideas and shape how the council achieves its objectives for their community.

It is important to recognise that different individuals may find different behaviours bullying or harassing so while there is not always intent to offend or cause harm, that does not mean that the effect of the behaviour has not caused harm or offence.

It can take people a period of time to decide to raise their concerns, as they worry about consequences (perhaps from peers by complaining about a colleague who is popular, or they fear victimisation from the perpetrator or others). The council should consider whether there are opportunities (such as 121s to offer opportunity to reflect on relationships/morale) to identify issues earlier and address negative behaviours. Individuals can often mention concerns they are experiencing but not want to take it further. The council should remind the complainant that it has a zero tolerance to bullying and harassment and remind them of the policy in place to address concerns. If the allegations mentioned are significant, the council may want to suggest that it will need to investigate further, even if a 'grievance' is not raised, so as to ensure that any concerns and risks are managed, and the council is meeting its responsibilities and duty of care as an employer.

Whilst both staff and councillors jointly determine the working culture, councillors are key in demonstrating what is and isn't acceptable behaviour. This is apparent from how councillors behave with each other in council meetings and also in how standards of behaviour are applied through the use of informal discussion and formal policies.

### **Scope**

All council representatives are expected to uphold the values of the Dignity at Work Policy, however this policy sets out how allegations from employees will be managed. As indicated in the policy, concerns from a contractor, agency worker etc. should be raised to the identified person, and an appropriate approach will be considered based on the situation and relationship of the complainant with the council.

Likewise, concerns raised about the behaviour of a contractor or agency worker would not generally be managed via the full process (such as the disciplinary process) but appropriate action would be considered based on the situation. To treat people (such as contractors, or a casual worker) engaged



by the council the same as an employee could blur the status of the employment relationship, so consider seeking professional advice if needed.

### **Managers**

Recognising that councils are of varying sizes, where the term manager/nominated manager is used it is recognised this could be the clerk/chief officer, another employee of the council, or a councillor depending on the situation. It is good practice to have a clearly identified person who is the responsible 'line manager' or equivalent contact for an employee so that there is clarity on how the employee should report concerns to, who they notify if they are sick or to request leave etc. More often for council employees this may be the clerk/chief officer, and for the clerk/chief officer this could be the chair/deputy Chair, or possibly chair of a staffing/personnel committee.

### **Bullying and harassment & performance management**

The policy sets out that bullying and harassment does not include appropriate criticism of an employee's behaviour or effective, robust performance management. It is not uncommon for an employee, when receiving critical feedback, to claim that this is bullying and/or harassing. It is the role of the nominated manager to provide effective and constructive feedback to encourage performance at the required standard.

Even when the feedback is not positive it should be fair, communicated in a professional and reasonable manner and shared with the objective of aiding understanding and achieving an improvement to overcome the shortfalls. There is no absolute definition of when the feedback may not be appropriate. Often it will be for the person/panel hearing the dignity at work complaint/grievance to determine whether the performance management has upheld the standards expected in terms of respect and civility and any feedback has been shared in a fair and professional way.

### **Responsibilities**

All staff and representatives of the council are responsible for their own behaviour in the workplace and for taking steps to revise unacceptable behaviour and appropriately challenge that of others.

Leaders – councillors, clerks, chief officers, managers - are responsible for ensuring that these standards of treating people with civility, respect and courtesy are upheld, both through their own example, and by communicating and promoting these expectations to all employees. They are also responsible for ensuring that concerns raised are treated seriously and addressed in line with this policy in a timely manner.

### **During the investigation**

Employers have a duty of care to provide a safe place of work. If a complaint is made, discuss how to manage working relationships whilst the allegation is being investigated and until the outcome is disclosed. This is as much for the protection of the alleged perpetrator as for the aggrieved.

Consider whether a neutral person should be offered as a 'listening ear' for both parties in the investigation. This could be a councillor or nominated manager who is not involved in the investigation or allegations and can be a point of check in as raising, or being subject to allegations can be stressful.

Offer other support that may be appropriate to the situation such as signposting to support groups, time off for counselling etc. If you have suspended a staff member, your duty of care continues and it is important to consider their wellbeing and mental health.

Ensure that you communicate regularly with both parties.

The investigation and any subsequent hearing should be completed in accordance with the grievance policy which sets out a process for dealing with concerns. You should ensure that the grievance policy adopted adheres to any local policies and procedures, with consideration of any timescales and escalation routes in your locally adopted policy.

### **Confidentiality**

It may be possible for concerns to be raised with the perpetrator without disclosing the name of the complainant however in a small council it is likely that it will be clear that the accused will know where the accusation has come from. The council representative (clerk/chief officer/councillor) speaking to the alleged perpetrator must be clear that the discussion is confidential and the individual would be at risk of formal disciplinary action if there is any sort of victimisation or retaliation for the individual raising their concern.

During any formal investigation it may be necessary to disclose the nature of the allegations and where they came from to ensure a fair and balanced investigation and process. This should be discussed with the person raising the concerns to understand any issues and how they may be mitigated. In some situations it may be appropriate to provide anonymised witness statements however this would be a last resort, and could compromise the fairness of the process. Where there is a genuine fear of consequences and this may need to be considered, it is recommended that professional advice is sought. For the same reason it can be difficult for a council to consider an anonymous complaint, however if the concerns are significant and compromise the council in their duty of care to employees, then consideration of how to deal with the matter may be required.

### **Victimisation**

All employees have the right to raise genuine concerns without the fear of reprisals. If the aggrieved (or a witness) is treated differently / less favourably because they have raised a complaint, then this is victimisation. This would include isolating someone because they have made a complaint, cancelling a planned training event, or giving them a heavier or more difficult workload. Victimisation can lead to a claim to an employment tribunal.

### **False allegations**

If an employee makes an allegation that they know to be untrue, or gives evidence that they know to be untrue, the council should consider the matter under the disciplinary procedure. Such an allegation would be potentially be gross misconduct.

### **Complaints against Councillors**

Following the Ledbury case, the law is clear that any formal complaint about a councillor regarding a breach of the code of conduct must be referred to the Monitoring Officer for investigation (either by the complainant, or the Council with agreement of the complainant). During the investigation, it is critical to ensure that where an employee of the council has made the complaint, that the council

agrees reasonable measures with the employee to protect their health and safety. Such measures may include a temporary change in duties, change of work location, not attending meetings with the person about whom the complaint has been made etc.

Careful consideration is required where a grievance is raised against the council as a whole due to lack of support related to councillor behaviours. The specific allegations will need to be considered to determine whether the allegations can be addressed by the council, or require exploration of the councillors behaviour in order to respond, in which case the Monitoring Officer may be required to investigate the alleged behaviours of a/any councillors where this may relate to the code of conduct. It is a matter of fact whether the complaint is against the council and can therefore be dealt with by the council's grievance procedure or against a councillor and can only be dealt with by the Monitoring Officer.

## MODEL COUNCILLOR-OFFICER PROTOCOL

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## INTRODUCTION

The purpose of this Protocol is to guide councillors and officers of the council in their relations with one another. The Protocol's intention is to build and maintain good working relationships between councillors and officers as they work together. Employees who are required to give advice to councillors are referred to as "officers" throughout.

A strong, constructive, and trusting relationship between councillors and officers is essential to the effective and efficient working of the council.

This Protocol also seeks to reflect the principles underlying the Code of Conduct which applies to councillors and the employment terms and conditions of officers. The shared objective is to enhance and maintain the integrity (real and perceived) of local government.

The following extract from the Local Government Association guidance on the 2020 Model councillor Code of Conduct states that:

*"Both councillors and officers are servants of the public and are indispensable to one another. Together, they bring the critical skills, experience and knowledge required to manage an effective local authority."*

*At the heart of this relationship, is the importance of mutual respect. councillor-officer relationships should be conducted in a positive and constructive way. Therefore, it is important that any dealings between councillors and officers should observe reasonable standards of courtesy, should show mutual appreciation of the importance of their respective roles and that neither party should seek to take unfair advantage of their position or seek to exert undue influence on the other party.*

*councillors provide a democratic mandate to the local authority and are responsible to the electorate whom they represent. They set their local authority's policy framework, ensure that services and policies are delivered and scrutinise local authority services.*

*[Councillors of the executive,] Chairs and vice chairs of committees have additional responsibilities. These responsibilities will result in increased expectations and relationships with officers that are more complex. Such councillors must still respect the impartiality of officers and must not ask them to undertake work of a party-political nature or compromise their position with other councillors or other officers.*

*Officers provide the professional advice and managerial expertise and information needed for decision making by councillors and to deliver the policy framework agreed by councillors. They are responsible for implementing decisions of councillors and the day-to-day administration of the local authority.*

*The roles are very different but need to work in a complementary way.*

*It is important for both sides to respect these differences and ensure that they work in harmony. Getting that relationship right is an important skill. That is why the code requires councillors to respect an officer's impartiality and professional expertise. In*

*turn officers should respect a councillor's democratic mandate as the people accountable to the public for the work of the local authority. It is also important for a local authority to have a councillor-officer protocol which sets out how this relationship works and what both councillors and officers can expect in terms of mutual respect and good working relationships."*

This Protocol covers:

- The respective roles and responsibilities of the councillors and the officer;
- Relationships between councillors and officers;
- Where/who a councillor or an officer should go to if they have concerns;
- Who is responsible for making decisions.

## **BACKGROUND**

This Protocol is intended to assist councillors and officers, in approaching some of the sensitive circumstances which arise in a challenging working environment.

The reputation and integrity of the council is significantly influenced by the effectiveness of councillors and the officer working together to support each other's roles.

The aim is effective and professional working relationships characterised by mutual trust, respect and courtesy. Overly close personal familiarity between councillors and officers is not recommended as it has the potential to damage this relationship

## **ROLES OF COUNCILLORS AND OFFICERS**

The respective roles of councillors and officers can be summarised as follows:

- Councillors and officers are servants of the public and they are indispensable to one another, but their responsibilities are distinct.
- Councillors are responsible to the electorate and serve only for their term of office.
- Officers are responsible to the council. Their job is to give advice to councillors and to the council, and to carry out the council's work under the direction and control of the council and relevant committees.

### **Councillors**

Councillors have four main areas of responsibility:

- To determine council policy and provide community leadership;
- To monitor and review council performance in implementing policies and delivering services;
- To represent the council externally; and
- To act as advocates for their constituents.

All councillors have the same rights and obligations in their relationship with the officer, regardless of their status and should be treated equally.

Councillors should not involve themselves in the day to day running of the council. This is the officer's responsibility, and the officer will be acting on instructions from the council or its committees, within an agreed job description.

In line with the councillors' Code of Conduct, a councillor must treat others with respect, must not bully or harass people and must not do anything which compromises, or is likely to compromise, the impartiality of those who work for, or on behalf of, the council.

Officers can expect councillors:

- to give strategic leadership and direction and to seek to further their agreed policies and objectives with the understanding that councillors have the right to take the final decision on issues based on advice
- to act within the policies, practices, processes and conventions established by the council
- to work constructively in partnership with officers acknowledging their separate and distinct roles and responsibilities
- to understand and support the respective roles and responsibilities of officers and their associated workloads, pressures and reporting lines
- to treat them fairly and with respect, dignity and courtesy
- to act with integrity, to give support and to respect appropriate confidentiality
- to recognise that officers do not work under the instruction of individual councillors or groups
- not to subject them to bullying, intimidation, harassment, or put them under undue pressure.
- to treat all officers, partners (those external people with whom the council works) and members of the public equally, and not discriminate based on any characteristic such as age, disability, gender reassignment, marriage or civil partnership, pregnancy and maternity, race, religion or belief, sex, sexual orientation.
- not to request officers to exercise discretion which involves acting outside the council's policies and procedures
- not to authorise, initiate, or certify any financial transactions or to enter into any contract, agreement or undertaking on behalf of the council or in their role as a councillor without proper and lawful authority
- not to use their position or relationship with officers to advance their personal interest or those of others or to influence decisions improperly
- to comply at all times with the councillors' Code of Conduct, the law, and such other policies, procedures, protocols and conventions agreed by the council.
- respect the impartiality of officers and do not undermine their role in carrying out their duties
- do not ask officers to undertake work, or act in a way, which seeks to support or benefit a particular political party or gives rise to an officer being criticised for operating in a party-political manner
- do not ask officers to exceed their authority where that authority is given

### Chairs and vice-chairs of council and committees

Chairs and vice-chairs have additional responsibilities as delegated by the council. These responsibilities mean that they may have to have a closer working relationship with employees than other councillors do. However, they must still respect the impartiality of officers and must not ask them to undertake work or anything else which would prejudice their impartiality.

### Officers

The primary role of officers is to advise, inform and support all members and to implement the agreed policies of the council.

Officers are responsible for day-to-day managerial and operational decisions within the council, including directing and overseeing the work of any more junior officers. councillors should avoid inappropriate involvement in such matters.

In performing their role officers will act professionally, impartially and with neutrality. Whilst officers will respect a councillor's view on an issue, the officer should not be influenced or pressured to make comments, or recommendations which are contrary to their professional judgement or views.

Officers must:

- implement decisions of the council and its committees which are lawful, which have been properly approved in accordance with the requirements of the law and are duly recorded. This includes respecting the decisions made, regardless of any different advice given to the council or whether the decision differs from the officer's view.
- work in partnership with councillors in an impartial and professional manner
- treat councillors fairly and with respect, dignity and courtesy
- treat all councillors, partners and members of the public equally, and not discriminate based on any characteristic such as age, disability, gender reassignment, marriage or civil partnership, pregnancy and maternity, race, religion or belief, sex, sexual orientation.
- assist and advise all parts of the council. Officers must always act to the best of their abilities in the best interests of the authority as expressed in the council's formal decisions.
- respond to enquiries and complaints in accordance with the council's standards protocol
- be alert to issues which are, or are likely to be, contentious or politically sensitive, and be aware of the implications for councillors, the media or other sections of the public.
- act with honesty, respect, dignity and courtesy at all times
- provide support and learning and development opportunities for councillors to help them in performing their various roles in line with the council's training and development policy



- not seek to use their relationship with councillors to advance their personal interests or to influence decisions improperly
- to act within the policies, practices, processes and conventions established by the council

Officers have the right not to support councillors in any role other than that of councillor, and not to engage in actions incompatible with this Protocol.

In giving advice to councillors, and in preparing and presenting reports, it is the responsibility of the officer to express his/her own professional views and recommendations. An officer may report the views of individual councillors on an issue, but the recommendation should be the officer's own. If a councillor wishes to express a contrary view they should not pressurise the officer to make a recommendation contrary to the officer's professional view, nor victimise an officer for discharging his/her responsibilities.

There are exceptional circumstances where a councillor can fulfil the role of officer, for example where there is a vacancy. This can only be done if the councillor is not paid for the role and should only ever be short-term while the council seeks to fill a vacancy. There will need to be a particular clear understanding of when the councillor is acting as a councillor and when acting as the Proper Officer.

#### The Relationship: General

Councillors and officers are indispensable to one another. However, their responsibilities are distinct. Councillors are accountable to the public, whereas officers are accountable to the council as a whole.

At the heart of this Protocol is the importance of mutual respect and also of civility. councillor/officer relationships are to be conducted in a positive and constructive way. Therefore, it is important that any dealings between councillors and officers should observe standards of courtesy and that neither party should seek to take unfair advantage of their position nor seek to exert undue influence on the other party.

Individual councillors should not actively seek to undermine majority decisions of the corporate body, as this could then bring them into conflict with officers who have been charged with promoting and implementing the council's collectively-determined course of action.

Councillors should not raise matters relating to the conduct or capability of an officer, or of officers collectively, in a manner that is incompatible with this Protocol at meetings held in public or on social media. This is a long-standing tradition in public service. An officer has no means of responding to criticisms like this in public.

A councillor who is unhappy about the actions taken by, or conduct of, an officer should:

- avoid personal attacks on, or abuse of, the officer at all times
- ensure that any criticism is well founded and constructive
- ensure that any criticism is made in private

- take up the concern with the chair

Neither should an officer raise with a councillor matters relating to the conduct or capability of another councillor or officer or to the internal management of the council in a manner that is incompatible with the objectives of this Protocol.

Potential breaches of this Protocol are considered below.

#### Expectations

All councillors can expect:

- A commitment from officers to the council as a whole, and not to any individual councillor, group of councillors or political group;
- A working partnership;
- Officers to understand and support respective roles, workloads and pressures;
- A timely response from officers to enquiries and complaints;
- Officer's professional and impartial advice, not influenced by political views or personal preferences;
- Timely, up to date, information on matters that can reasonably be considered appropriate and relevant to their needs, having regard to any individual responsibilities or positions that they hold;
- Officers to be aware of and sensitive to the public and political environment locally;
- Respect, courtesy, integrity and appropriate confidentiality from officers and other councillors;
- Training and development opportunities to help them carry out their role effectively;
- Not to have personal issues raised with them by officers outside the council's agreed procedures;
- That officers will not use their contact with councillors to advance their personal interests or to influence decisions improperly.

Officers can expect from councillors:

- A working partnership;
- An understanding of, and support for, respective roles, workloads and pressures;
- Leadership and direction;
- Respect, courtesy, integrity and appropriate confidentiality;
- Not to be bullied or to be put under undue pressure;
- That councillors will not use their position or relationship with officers to advance their personal interests or those of others or to influence decisions improperly;
- That councillors will at all times comply with the council's adopted Code of Conduct.

#### Some general principles

Close personal relationships between councillors and officers can confuse their separate roles and get in the way of the proper conduct of council business, not least by creating a perception in others that a particular councillor or officer is getting preferential treatment.

Special relationships with particular individuals are not recommended as it can create suspicion that an employee favours that councillor above others.

The Proper Officer (usually called the Clerk) is the head of paid services and has a line-management responsibility to all other staff. Communications should be made directly with the Proper Officer, unless it is agreed by the Proper Officer that such communications may take place directly with other officers over a particular matter. Councillors should not give instructions directly to the Proper Officer's staff without the express approval of the Proper Officer.

### **COUNCILLORS' ACCESS TO INFORMATION AND TO COUNCIL DOCUMENTS**

Councillors are free to approach officers to provide them with such information, explanation and advice as they may reasonably need in order to assist them in discharging their role as members of the council. This can range from a request for general information about some aspect of the council's activities to a request for specific information on behalf of a constituent. Such approaches should normally be directed to the Officer.

The legal rights of councillors to inspect council documents are covered partly by statute and partly by the common law.

The common law right of councillors is based on the principle that any member has a prima facie right to inspect council documents so far as their access to the documents is reasonably necessary to enable the member properly to perform their duties as a member of the council. This principle is commonly referred to as the "need to know" principle.

The exercise of this common law right depends therefore upon the councillor's ability to demonstrate that they have the necessary "need to know". In this respect a member has no right to "a roving commission" to go and examine documents of the council. Mere curiosity is not sufficient. The crucial question is the determination of the "need to know". This question must be determined by the officer.

In some circumstances (e.g. a committee member wishing to inspect documents relating to the functions of that committee) a councillor's "need to know" will normally be presumed. In other circumstances (e.g. a councillor wishing to inspect documents which contain personal information about third parties) a councillor will normally be expected to justify the request in specific terms. Any council information provided to a councillor must only be used by the councillor for the purpose for which it was provided i.e. in connection with the proper performance of the councillor's duties as a member of the council.

For completeness, councillors do, of course, have the same right as any other member of the public to make requests for information under the Freedom of Information Act 2000.

### **CORRESPONDENCE**

Correspondence between an individual councillor and an officer should not normally be copied (by the officer) to any other councillor. Where exceptionally it is necessary to copy

the correspondence to another councillor, this should be made clear to the original councillor. In other words, a system of "silent copies" should not be employed. Acknowledging that the "BCC" system of e-mailing is used, it should be made clear at the foot of any e-mails if another councillor has received an e-mail by adding "CC councillor X."

Official letters or emails on behalf of the council should normally be sent out under the name of the officer, rather than under the name of a councillor. It may be appropriate in certain circumstances (e.g. representations to a Government Minister) for a letter or email to appear over the name of the chair, but this should be the exception rather than the norm. Letters or emails which, for example, create obligations or give instructions on behalf of the council should never be sent out in the name of a councillor.

Correspondence to individual councillors from officers should not be sent or copied to complainants or other third parties if they are marked "confidential". In doing so, the relevant officer should seek to make clear what is to be treated as being shared with the councillor in confidence only and why that is so.

## **PRESS AND MEDIA**

Councils are accountable to their electorate. Accountability requires local understanding. This will be promoted by the council, explaining its objectives and policies to the electors and customers. Councils use publicity to keep the public informed and to encourage public participation. The council needs to tell the public about the services it provides. Good effective publicity should aim to improve public awareness of the council's activities. Publicity is a sensitive matter in any political environment because of the impact it can have. Expenditure on publicity can be significant. It is essential to ensure that decisions on publicity are properly made in accordance with the Code of Recommended Practice on Local Authority Publicity and the council's Media Protocol.

The officer may respond to press enquiries but should confine any comments to the facts of the subject matter and the professional aspects of the function concerned. On no account must an officer expressly or impliedly make any political opinion, comment or statement.

Any press release that may be necessary to clarify the council's position in relation to disputes, major planning developments, court issues or individuals' complaints should be approved by the officer.

The chair (or chair of a committee) may act as spokespersons for the council in responding to the press and media and making public statements on behalf of the council but should liaise with the officer on all forms of contact with the press and media. The council may also appoint individual councillors as spokespeople where there is an area of particular expertise but this should only be done with the agreement of the council.

The council must comply with the provisions of the Local Government Act 1986 ("the Act") regarding publicity. All media relations work will comply with the national Code of Practice

for Local Government Publicity. The Code is statutory guidance and the council must have regard to it and follow its provisions when making any decision on publicity.

The LGA has produced useful guidance on the Publicity Code -

<https://www.local.gov.uk/publications/short-guide-publicity-during-pre-election-period>

For more detailed information and guidance regarding the role of councillors in connection with the use of social media, reference should be made to the council's Social Media Protocol where there is one in place.

## **IF THINGS GO WRONG**

Procedure for officers:

From time to time the relationship between councillors and the officer (or other employees) may break down or become strained. Whilst it is always preferable to resolve matters informally, it is important that the council adopts a formal grievance protocol or procedure.

The principal council's monitoring officer may be able to offer a mediation/conciliation role or it may be necessary to seek independent advice. The chair of the council should not attempt to deal with grievances or work related performance or line management issues on their own. The council should delegate authority to a small group of councillors to deal with all personnel matters.

The law requires all employers to have disciplinary and grievance procedures. Adopting a grievance procedure enables individual employees to raise concerns, problems or complaints about their employment in an open and fair way.

Where the matter relates to a formal written complaint alleging a breach of the councillors' Code of Conduct the matter must be referred to the principal council's monitoring officer in the first instance in line with the Localism Act 2011. The council may however try to resolve any concerns raised informally before they become a formal written allegation.

Procedure for councillors:

If a councillor is dissatisfied with the conduct, behaviour or performance of the officer or another employee, the matter should be reported to the chair and then raised with the officer in the first instance. If the matter cannot be resolved informally, it may be necessary to invoke the council's disciplinary procedure.



# Civility & Respect for the local council sector

- IS top of the  
agenda

## Definition of civility & respect

**Civility means politeness and courtesy in behaviour, speech, and in the written word.**

Examples of ways in which you can show respect are by listening and paying attention to others, having consideration for other people's feelings, following protocols and rules, showing appreciation and thanks, and being kind.



**Civility &  
Respect**

IN COLLABORATION WITH SLCC, NALC, OVW, COUNTY ASSOCIATIONS

For more information about how  
to get involved, visit:  
[www.nalc.gov.uk](http://www.nalc.gov.uk) or [www.slcc.co.uk](http://www.slcc.co.uk)

# Civility & Respect Pledge

To treat other councillors, clerks, all employees, members of the public, representatives of partner organisations and volunteers with civility and respect in their roles.



## How will this culture change be achieved?

- ✓ Council signs up to Civility & Respect Pledge
- ✓ Undertake recommended training for clerks, councillors and chairpersons
- ✓ Good employment practices
- ✓ Good governance
- ✓ Continued lobbying for change in legislation (including sanctions)
- ✓ Dignity at work policy
- ✓ Seek professional help at early stages of problem
- ✓ Learning from best practice
- ✓ Being a role model/champion council (Local Council Award Scheme)
- ✓ Calling out bullying and harassment when it happens

**Take the  
pledge**

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The Civility and Respect Project is an ongoing and evolving project committed to improving standards for all involved in local councils.



**Civility &  
Respect**

IN COLLABORATION WITH LCC, NAC, OVV COUNTY ASSOCIATIONS

## **GENERAL INFORMATION - The Public Sector Deposit Fund/CCLA:**

Fund-size is £1.4bn+, yield 4.9338%, net of fees (21/10/2024)

CCLA (Churches, Charities & Local Authorities) is a mutually owned firm of investment managers, owned by LAMIT (Local Authorities Mutual Investment Trust), the Church of England (Central Board of Finance) Investment Fund and the Charities (COIF) Investment Fund;

We have 35,000+ clients and manage £14bn+ of cash and investments;

The Local Government Association invited us to develop the Fund in collaboration with the sector, as a result of the Icelandic banking crisis. It was launched in May 2011;

The PSDF is a "Qualifying Money Market Fund" (QMMF) which is classed as a "low volatility net asset value" (LVNAV) short term money market fund. The fund is managed with the priorities of security, liquidity and yield.

The fund is not covered by the FSCS, but it has a AAmmf credit rating by Fitch (highest possible rating)

The rating was affirmed on the 6 February 2023 by the credit rating agency Fitch Ratings and offers an independent assessment of the strength of the fund. The rating reflects the Fund's extremely strong capacity to achieve the investment objectives of preserving principal and providing shareholder liquidity through limiting credit, market and liquidity risk. The main drivers of the AAmmf rating are the high credit quality of the portfolio, the limited range of invested security types and the Fund's highly conservative investment guidelines as well as Fitch's assessment of the competencies of CCLA.

The Fund boasts strong governance with an Advisory Board made up of representatives of the LGA, CIPFA and treasury specialists from the sector, including representatives of the LB of Waltham Forest and the GLA;

The Fund is managed on a very conservative basis (beyond the requirements of AAmmf rating), only using plain cash products and instruments with well rated (minimum F1 short term) banks: call; term and certificates of deposit - the kind of products that Councils themselves feel comfortable using. There is no exposure to the stock market, derivatives, other funds, asset backed securities - nothing exotic;

The minimum initial investment is just £25,000

Access is same day. We have an 11:30 cut-off time for instructions;

The Annual Management Charge is currently 0.08%.

The Fund has exceeded £1.4b under management with 900+ clients (including 22 County/unitary Councils, 700+ Parish, Town and Community Councils and 100+ District/Borough Councils, Police, Fire plus the LGA, NALC, 6 County Associations, SLCC, NILGA, 3 Port Authorities and 2 crematoriums)

The assets of the fund are strictly placed within agreed limits with a diversified list of quality counterparties in order to achieve a low level of risk and high security of capital, the list of



approved counterparties is constantly monitored following credit rating upgrades or downgrades. Prior to adding a counterparty to the approved list of financial institutions we assess corporate governance, approach to sustainability and climate change.

The Public Sector Deposit Fund ("PSDF") is a UK regulated fund and is subject to the FCA COLL Regulations ("COLL"). COLL requires that the assets of a regulated fund are held by the Depositary of the fund. The Depositary is responsible for the safe keeping of the assets of the fund. The Depositary of PSDF is HSBC Bank plc. The assets of the fund cannot be co-mingled with the assets of CCLA. While CCLA is the manager of PSDF, PSDF is a separate legal entity. The assets of PSDF could not be combined with the assets of CCLA in the event of the insolvency of CCLA.

The Public Sector Deposit Fund is a short term LVNAV Qualifying Money Market Fund. This change from the previous Constant Net Asset Value (CNAV) structure is the result of European reforms intended to replicate some of the utility of the previous CNAV funds but with greater sensitivity to market pricing and extra controls built into the fund structure to protect investors. The Fund is not covered by the Financial Services Compensation Scheme, nor is it a guaranteed investment. An investment in the Fund is different to an investment in deposits and Investors may not get back what was invested. The risk of loss is borne by the Investor. The Fund does not rely on external support for guaranteeing liquidity or stabilising the share price. Further information can be found in the Scheme Prospectus

# Key Investor Information

## The Public Sector Deposit Fund

This document provides you with key investor information about this fund. It is not marketing material. The information is required by law to help you understand the nature and the risks of investing in this fund. You are advised to read it so you can make an informed decision about whether to invest.

**The Public Sector Deposit Fund (the fund) Income Share Class 4 ISIN: GB00B3LDFH01**

**A sub-fund of CCLA Public Sector Investment Fund (the company).**

**An open-ended investment company (OEIC) that is managed by CCLA Investment Management Limited, the authorised corporate director (the ACD or CCLA).**

### Objectives and Investment Policy

The investment objective of the fund is to maximise the current income consistent with the preservation of principal and liquidity by investing in a diversified portfolio of high-quality sterling denominated deposits and instruments. The primary objective is to maintain the net asset value (NAV) per share of the fund at par (net of earnings).

The investment policy of the fund is to only invest in sterling denominated investments and deposits. The principal investments will comprise certificates of deposit, call accounts, and term deposits with banks and building societies. The fund may also invest in other securities such as commercial paper, floating rate notes and bonds which may be issued or guaranteed as to principal or interest by sovereign governments and their agencies, supranational entities, corporations and financial institutions. All investments at the time of purchase will be considered by the ACD to be of high quality, meaning that the ACD has performed its own documented assessment of the credit quality of money market instruments taking into account ratings awarded by a credit rating agency registered and supervised by the Financial Conduct Authority (FCA) or European Securities and Markets Authority.

The fund is a low volatility net asset value short-term money market fund under the UK Money Market Funds Regulation

(MMFR). The weighted average maturity of the fund's investments will not exceed 60 days and the initial or remaining maturity of each investment will not exceed 397 days at the time of purchase.

The weighted average life of the fund's investments will not exceed 120 days.

**Investment style:** The fund is actively managed which means the ACD, as investment manager, uses their discretion to pick investments to seek to achieve the fund's investment objective.

**Comparator benchmark:** For comparison purposes only, the fund measures its performance against the Sterling Overnight Index Average (SONIA).

**Target market:** The fund is marketable to professional and retail investors but is principally targeted at public sector investors. The fund is suitable for investors who are looking for security, liquidity and yield in that order.

The shares that you will hold in the fund are income shares. This means income from the fund's investments will be paid out to you as a dividend on a monthly basis.

You can buy or sell shares daily (on each business day of the fund). Instructions (and for purchases, cleared funds) must be received by the registrar before 11.30 am London time on the relevant dealing day

### Risk and Reward Profile



The risk and reward rating is based on historical data and may not be a reliable indicator of future risks or rewards. The risk category shown is not guaranteed and may shift over time. The lowest category does not mean 'risk free'.

A low-risk fund is not a risk-free investment. Low-risk funds target investments with low volatility and aim to maintain a constant net asset value at par. This means the risk of losing your money is small, but the chance of making gains is also limited. **Shareholders and potential shareholders should note that, in certain circumstances, the fund will not accept redemptions or subscriptions at a constant NAV per share.**

The ACD applies a liquidity management process for ensuring compliance with weekly liquidity thresholds applicable to the fund under the MMFR. Measures and various tools are at the ACD's disposal for maintaining compliance with the prescribed limits and include the imposition of liquidity fees on redemptions, redemption gates and temporary suspension of redemptions.

The risk and reward rating does not cover the following additional risks:

- **The value of the fund's shares is not guaranteed, and buying shares is not the same as making a deposit with a bank or other deposit taking body. Please see the additional information section below.**
- Investment is at your own risk. The fund has no capital guarantees and the value of your investment may go up or

down. Any loss of principal is to be borne by the investor.

- The fund aims to maintain a stable NAV per share, however there is no guarantee that a stable NAV per share will be maintained.
- The fund does not rely on external support for guaranteeing the liquidity of the fund or stabilising the NAV per share.
- The value of the fund may be affected by movements in interest rates (which may include interest rates turning negative) and the creditworthiness of the issuers of the debt instruments the fund invests in.
- **Counterparty risk** - The fund could lose money if an entity with which it does business becomes unwilling or is unable to meet its obligations to the fund.
- **Operational risk** - Operational risks arising from errors in processing transactions, preparing valuations, accounting and financial reporting, among other things, may also affect the value of your investments.
- **Credit risk** - The fund is exposed to the issuers of the securities it invests in. If these financial institutions experience financial difficulty, they may be unable to pay back some or all of the interest, original investment or other payments that they owe. If this happens, the value of the fund may fall.

Please refer to the prospectus for full details about the risks associated with this fund.

### Charges for this Fund

The charges you pay are used to pay the costs of running the fund, including the costs of marketing and distributing it. These charges reduce the potential growth of your investment.

The **ongoing charges** figure is based on the annual management charge. The annual management charge is currently 0.08% per annum (having been reduced from 0.10% per annum until further notice) and is inclusive of all other ongoing charges. This figure may vary from year to year. It excludes portfolio transaction costs.

Although unlikely (reflecting the liquid nature of qualifying investments to be held), a dilution levy, which will change the prices for buying or selling shares in the fund with the aim of mitigating the effects of dealing and other charges the fund incurs, may be made on a purchase or sale of shares in the fund.

For more information about charges, please see the section titled "Charges and Expenses" of the company's prospectus, which is available at [www.ccla.co.uk](http://www.ccla.co.uk).

#### One-off charges taken before or after you invest

Entry charge	0.00%
Exit charge	0.00%

The one-off charges are indicative charges that might be taken out of your money before it is invested and before the proceeds of your investment are paid out.

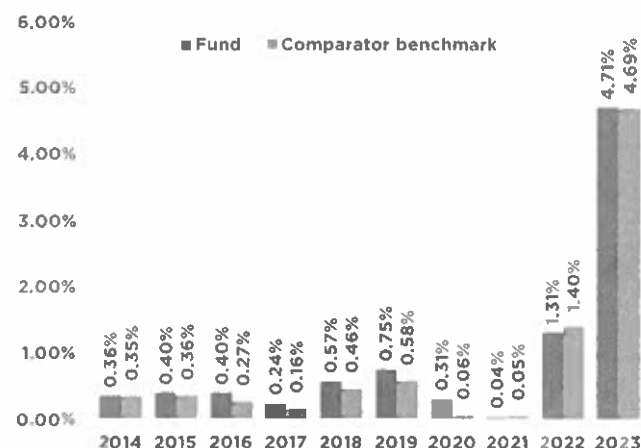
#### Charges taken from the fund over a year

Ongoing charges (currently)	0.08%
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#### Charges taken from the fund under specific conditions

Performance fee	None
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## Past Performance



The fund launched on 25 May 2011. This share class started to issue shares on the 25 May 2011.

Past performance is not a reliable indicator of future results. The performance shown is net of charges and has been calculated in pounds sterling.

Comparator benchmark: SONIA. Prior to 1 January 2021, the comparator benchmark was 7 Day Sterling London Interbank Bid Rate (LIBID).

## Practical Information

### Depository

HSBC Bank plc, 8 Canada Square, London E14 5HQ.

### Documents and share prices

Copies of the prospectus and the latest annual and half yearly report and accounts (which are available in English only), along with the latest published share prices can be obtained free of charge at [www.ccla.co.uk](http://www.ccla.co.uk) or alternatively call our client services team on 0800 022 3505. The shares are not listed on any stock exchange.

### Share classes

More share classes may be available to you. Please refer to the prospectus for the company for further details.

This document is prepared for income share class 4. Income share class 4 is also representative of income share class 3, therefore a separate key investor information has not been prepared for income share class 3. Income share class 3 is available for investment.

### Segregated liability

The company is an umbrella fund with segregated liability between sub-funds. It does not currently offer any other sub-funds in addition to the fund.

### Switching

Shares in one sub-fund or share class may be exchanged for shares in another sub-fund or share class (currently, however, as the fund is the only sub-fund available for investment there is no facility to switch between sub-funds).

### Tax

UK tax legislation may have an impact on your tax position. For further details you should consult your professional tax adviser.

### Remuneration

The up-to-date remuneration policy including a description of how remuneration and benefits are calculated, the identity of persons responsible for awarding the remuneration and benefits, and the composition of CCLA's remuneration committee, may be obtained free of charge by contacting the client services team or visiting [www.ccla.co.uk](http://www.ccla.co.uk).

### Additional information

Please refer to the **glossary** on our website for explanations of terms used in this communication. If you would like the information in an alternative format or have any queries, please call us on 0800 022 3505 or email us at [clientservices@ccla.co.uk](mailto:clientservices@ccla.co.uk).

The fund is not a bank account and is not covered by the Financial Services Compensation Scheme's (FSCS) deposit protection. The fund is recognised as a money-market fund under the MMFR. Therefore, under the rules of the FSCS it is an investment and is covered under the 'Investments' section of the FSCS. The maximum amount that can be claimed under the FSCS is £85,000. For further information about the FSCS please refer to [www.fscs.org.uk](http://www.fscs.org.uk) or phone 0800 678 1100.

The fund is a sub-fund of CCLA Public Sector Investment Fund, an umbrella OEIC. The prospectus and annual/half yearly report and accounts contain information about the sub-fund in CCLA Public Sector Investment Fund.

CCLA Investment Management Limited may be held liable solely on the basis of any statement contained in this document that is misleading, inaccurate or inconsistent with the relevant parts of the prospectus for the company.

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This fund is authorised in the UK and regulated by the Financial Conduct Authority.

CCLA Investment Management Limited is authorised in the UK and regulated by the Financial Conduct Authority.

This key investor information is accurate as at 16 February 2024

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# **HEBDEN ROYD TOWN COUNCIL**

## **RESERVES & INVESTMENT POLICY**

**2025/26 FINANCIAL YEAR**

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## **Reserves Policy**

### **1. Introduction**

- 1.1 Hebden Royd Town Council is required to maintain adequate financial reserves to meet the needs of the organisation.
- 1.2 Governance and Accountability for Smaller Authorities in England, A Practitioners' Guide to Proper Practices to be applied in the preparation of statutory annual accounts and governance statements states that: "The authority needs to have regard to the need to put in place a General Reserve Policy and have reviewed the level and purpose of all Earmarked Reserves."
- 1.3 The purpose of this policy is to set out how the Council will determine and review the level of reserves that it holds.

### **2. Types of Reserves**

- 2.1 Reserves can be categorised as general or earmarked.
- 2.2 Earmarked reserves can be held for several reasons:
  - 2.2.1 Renewals – to enable services to plan and finance an effective programme of vehicle, equipment and infrastructure replacement and planned property maintenance. These reserves are a mechanism to smooth expenditure so that a sensible replacement programme can be achieved without the need to vary budgets.
  - 2.2.2 Carry forward of underspend - some services commit expenditure to projects but cannot spend the budget in year. Reserves are used as a mechanism to carry forward these resources.
  - 2.2.3 Insurance reserve – to enable the Council to meet the excesses of claims not covered by insurance.
  - 2.2.4 Other earmarked reserves may be set up from time to time to meet known or predicted liabilities.
- 2.3 General Reserves are funds which do not have any restrictions as to their use. These reserves can be used to smooth the impact of uneven cash flows, offset the budget requirement if necessary or can be held in case of unexpected events or emergencies.

### **3. Earmarked Reserves**

- 3.1 Earmarked reserves will be established on a "needs" basis, in line with anticipated requirements.
- 3.2 Any decision to set up a reserve will be made by Full Council or the Strategy & Review Committee.
- 3.3 Expenditure from reserves can only be authorised by the Council, or by the Strategy & Review Committee with relevant delegated authority.
- 3.4 Reserves should not be held to fund on-going expenditure. This would be unsustainable as, at some point, the reserves would be exhausted. To the extent that reserves are used to meet short term funding gaps, they must be replenished in the following year. However, earmarked reserves that have been used to meet a specific

liability would not need to be replenished, having served the purpose for which they were originally established.

- 3.5 All Earmarked Reserves are recorded on a central schedule held by the Responsible Financial Officer which lists the various Earmarked Reserves and the purpose for which they are held. This is presented to Councillors at least once per year as part of the annual financial statements.
- 3.6 Reviewing the Council's Financial Risk Assessment is part of the budgeting and year end accounting procedures and identifies planned and unplanned expenditure items and therefore informs the appropriate level of Reserves.
- 3.7 At the time of drawing up this policy Hebden Royd Town Council has the following, standing approvals in place for the earmarking of receipts:
- Hebden Bridge Picture House Phase One
  - Hebden Bridge Picture House Phase Two
- 3.8 On 31<sup>st</sup> March 2025 Hebden Royd Town Council had earmarked reserves totalling £.

#### **4 General Reserves**

- 4.1 The primary means of building general reserves will be through an allocation from the annual budget. This will be in addition to any amounts needed to replenish reserves that have been consumed in the previous year.
- 4.2 The Council must build and maintain sufficient working balances to cover the key risks it faces, as expressed in its financial risk assessment.
- 4.3 If in extreme circumstances General Reserves were exhausted due to major unforeseen spending pressures within a particular financial year, the Council would be able to draw down from its earmarked reserves to provide short term resources.
- 4.4 Even at times when extreme pressure is put on the Council's finances the Council must keep a minimum balance sufficient to pay three months salaries to staff in General Reserves at all times.

#### **5 Level of Financial Reserves**

- 5.1 Sections 32 and 43 of the Local Government Finance Act 1992 require local authorities to have regard to the level of reserves needed for meeting estimated future expenditure when calculating the budget requirement.
- 5.2 Governance and Accountability March 2020 states that:
- "In practice, any authority with an Net Revenue Expenditure in excess of £200,000 should plan on 3 months equivalent General Reserve."
- 5.3 For Hebden Royd Town Council this figure is £ in the 2024/25 financial year, made up as follows: •
- |                     |   |
|---------------------|---|
| • Precept 2023/24   | £ |
| • Election Expenses | £ |
- 5.4 On 31<sup>st</sup> March 2024 the level of General Reserves held on the Council's balance sheet stood at £108,307.

- 5.5 The level of financial reserves held by the Council will be monitored by the Council's Strategy & Review Committee.

## **6 Investment Policy**

- 6.1 This policy sets out the treasury management procedures for the monitoring of the cash flow and banking arrangements of Hebden Royd Town Council.
- 6.2 The Council defines its treasury management activities as 'the management of the Council's cash flows, its banking and money market transactions, the effective control of the risks associated with those activities, and the pursuit of best value performance consistent with those risks'.
- 6.3 This policy complies with the revised requirements set out in the Department of Communities and Local Government Guidance on Local Government Investments and takes into account Section 15(1)(a) of the Local Government Act 2003 and guidance within Governance and Accountability for Local Councils Practitioners Guide 2020.
- 6.4 Town & Parish Councils have the power to invest surplus funds and the Local Government Act 2003 states that a local authority may invest:
  - a) For any purpose relevant to its functions under any enactment.
  - b) For the purpose of prudent management of its financial affairs.
- 6.5 Hebden Royd Town Council acknowledges its duty of care to the community and the prudent management and investment of its funds.
- 6.6 This policy should be read in conjunction with the Council's current Financial Regulations.

## **7 Objectives**

- 7.1 The Council's priorities are, in the following ranking order:
  - i. The security of capital to minimise the risk of losses
  - ii. The liquidity of investments to meet the cash flow needs of the Council
  - iii. Maximising income within the framework of the national economic situation.
- 7.2 The Council will aim to achieve a high rate of return on investments commensurate with adequate safeguards of security and liquidity.
- 7.3 The borrowing of money purely to invest or to lend and make a return is not allowed and the Council will not engage in such activity.
- 7.4 The Council will monitor the risk of loss on investments by review of credit ratings on a regular basis – at least once per financial year. The Council will only invest in institutions of high credit quality – based on information from credit rating agencies (as defined in 10.1 below). Investments will be spread over different providers to minimise risk. The current Financial Services Compensation Scheme (FSCS) limit is £85,000 per institution licence.



## **8 Investments**

- 8.1 The definition of an investment covers all of the financial assets of a local authority as well as other non-financial assets that the organisation holds primarily or partially to generate a profit; for example, investment property portfolios. This may therefore include investments that are not managed as part of normal treasury management processes or under treasury management delegations.
- 8.2 Specified investments are those offering high security and high liquidity, made in sterling and with a maturity of no more than a year. Such short-term investments made with the UK Government or a Local Authority (as defined) or a Town/Parish Council will automatically be Specified Investments.
- 8.3 The Council, for prudent management of its treasury balances may use:  
a) Treasury Deposits with UK clearing banks  
b) Local Authorities or other Public Authorities approved public sector investment funds.  
(Treasury Deposits are money market deposits that offer fixed rates of return over an agreed period.)
- 8.4 The choice of institution and length of deposit will be at the approval of the Strategy & Review Committee, in consultation with the Responsible Financial Officer (RFO).
- 8.5 The Council will aim to achieve the optimum return on its investments commensurate with the proper levels of security and liquidity.

### **Non-Specified Investments**

- 8.6 A non-specified investment are non-financial assets that the organisation holds primarily or partially to generate a profit. Where a local authority holds a non-financial investment, it will normally be a physical asset that can be realised to recoup the capital invested.
- 8.7 These investments have greater potential risk – examples include investment in the money market, stocks and shares. Given the unpredictability and uncertainty surrounding such investments the Council will not use this type of investment.

### **Liquidity of Investments**

- 8.8 The Strategy & Review Committee, in consultation with the Responsible Financial Officer (RFO), will determine the maximum periods for which funds may prudently be committed so as not to compromise liquidity.
- 8.9 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.

### **Long Term Investments**

- 8.10 Long term investments as defined in Governance and Accountability March 2020 have a maturity of 12 months or more.
- 8.11 The Council does not currently hold any funds in long term investments.

## **9 Investment Strategy**

- 9.1 The day-to-day banking will remain with Co-Operative Bank for the time being.

- 9.2 The intention is to retain up to three month's operating cash in the current account, drawing from the linked deposit account in the same bank.
- 9.3 The aim of this strategy is to spread the risk amongst institutions to retain as much FSCS protection as possible. Spreading the risk by maximising use of the state backed guarantee may not always result in the biggest returns but does serve to protect public funds.
- 9.4 Other investments from the Council's General and Earmarked Reserves will be split between banks and institutions approved by Full Council, upon recommendation by the Strategy & Review Committee from time to time.
- 9.5 Investment movements will be carried out between approved organisations by the RFO in accordance with the investment objectives and decisions take by Full Council and the Strategy & Review Committee.
- 9.6 The Council will avoid capitalisation restrictions and will not enter into investments such as where the purchase of company shares is undertaken or where more than £10,000 is received from the sale of shares.

## **10 Approved Institutions**

### **10.1 Credit Ratings**

The Town Council will only make investments with institutions who hold the following credit rating scores:

#### **10.1.1 Moody's**

- Aa Obligations rated Aa are judged to be of high quality and are subject to very low credit risk
- A Obligations rated A are judged to be upper-medium grade and are subject to low credit risk

#### **10.1.2 Fitch**

- AA Very high credit quality - 'AA' ratings denote expectations of very low default risk. They indicate very strong capacity for payment of financial commitments. This capacity is not significantly vulnerable to foreseeable events.
- A High credit quality - 'A' ratings denote expectations of low default risk. The capacity for payment of financial commitments is considered strong. This capacity may, nevertheless, be more vulnerable to adverse business or economic conditions than is the case for higher ratings.
- BBB Good credit quality - 'BBB' ratings indicate that expectations of default risk are currently low. The capacity for payment of financial commitments is considered adequate, but adverse business or economic conditions are more likely to impair this capacity.

#### **10.1.3 Standard & Poor's**

- AA An obligation rated 'AA' differs from the highest-rated obligations only to a small degree. The obligor's capacity to meet its financial commitments on the obligation is very strong.
- A An obligation rated 'A' is somewhat more susceptible to the adverse effects of changes in circumstances and economic conditions than obligations in higher-rated categories. However, the obligor's capacity to meet its financial commitments on the obligation is still strong.
- BBB An obligation rated 'BBB' exhibits adequate protection parameters. However, adverse economic conditions or changing circumstances are more likely to

weaken the obligor's capacity to meet its financial commitments on the obligation.

**10.2 Currently Approved banks (and subsidiaries thereof):**

- Lloyds Banking Group
- TSB Barclays
- HSBC
- Royal Bank of Scotland (RBS)
- NatWest
- Ulster Bank
- Coutts & Co
- Santander UK
- The Co-operative Bank
- Bank of Ireland UK
- Clydesdale Bank PLC
- Sainsbury's Bank
- Tesco Bank
- Virgin Money

**10.2 Building societies:**

- Nationwide BS
- Yorkshire BS
- Coventry BS
- Skipton BS
- MHBS

**10.3 Other approved funds:**

- CCLA Public Sector Deposit Fund
- Other Government Schemes and Bonds of short-term liquidity (not more than one year)

**This Reserves & Investment Policy was prepared by Iona Taylor, Clerk and RFO to the Town Council.**

**Signed:** .....  
**Dated:** .....

**This Reserves & Investment Policy was adopted by the Town Council at its meeting held on:**

**Signed:** .....  
**Councillor** , **Mayor of Hebden Royd**

**Dated:** .....