

Dunstable Town Council

Grove House, 76 High Street North, Dunstable, Beds, LU6 1NF

PUBLIC NOTICE OF MEETING

Personnel Sub-Committee

Friday, 28 August 2026

Dear All,

Notice is hereby given of a public meeting of the Personnel Sub-Committee to be held at 7:00 PM on Thursday, 10 September 2026 at Council Chamber.

Members of the public and press are welcome to attend in person. To submit a question, please contact the Council at democratic@dunstable.gov.uk or call 01582 513000 by 4 pm on the Friday immediately before the meeting.



Yours Sincerely

A handwritten signature in blue ink, appearing to read 'Paul Hodson'. The signature is fluid and cursive, with the first name 'Paul' and last name 'Hodson' clearly distinguishable.

Paul Hodson

Town Clerk and Chief Executive to Dunstable Town Council

Apologies for Absence

1. Minutes

To agree the minutes of the Personnel Sub-Committee meeting of 5 June 2026 as an accurate record

2. Declarations of Interest

3. HR Summary

4. Policy Update

5. Exclusion of Public and Press

To RESOLVE that, under the Public Bodies (Admission to Meetings) Act 1960 s.1(2), the public and press be excluded from the remainder of the meeting by reason of the confidential nature of the business to be transacted.

6. Personnel Matters (*Exempt*)

7. Date of the Next Meeting

Thursday 12 November at 7 pm

APPENDIX I — Public Documents

3. HR Summary

Item 3. HR Summary.pdf

4. Policy Update

Item 4. Policy Update.pdf

Item 4. App 1. Violence & Aggression at Work (DRAFT).pdf

Item 4. App 2. Subsistence (REVIEWED).pdf

Item 4. App 3. Honorarium and Acting-Up (REVIEWED).pdf

Item 4. App 4. Post Entry Training Scheme (REVIEWED).pdf

Item 4. App 5. Fraud and Ethics (REVIEWED).pdf

Item 4. App 6. Capability Policy (REVIEWED).pdf

Item 4. App 7. Complaints Policy (REVIEWED).pdf

DUNSTABLE TOWN COUNCIL
PERSONNEL SUB-COMMITTEE
THURSDAY 10 SEPTEMBER 2026
HR SUMMARY

Purpose of report: For information

1. STAFFING

- 1.1. Dunstable Town Council currently employs 79 staff.
- 1.2. Of these staff, 52 have permanent contracts, 2 have fixed-term contracts, and 25 are casual workers.
- 1.3. 37 employees are full-time; 17 employees are part-time.
- 1.4. The Corporate Performance and Compliance Manager will return from maternity leave on 7 September 2026. The fixed-term contract for the officer providing maternity cover will end on 18 September 2026.
- 1.5. The program to recruit staff for Priory House has begun. New staff will join on staggered start dates over the coming months with the aim to have all staff in place by the beginning of December. During this period, staff will complete an intense training program as well as preparing Priory House for the re-opening.
- 1.6. Members should note that on 24 August the annual pay award was agreed by the Local Government Association (LGA) on behalf of the National Joint Council (NJC). The settlement was agreed at 3.3% on all spinal column points (SCP) and to be backdated to the 1 April 2026. This will be implemented for all staff in the September payroll.

2. SICKNESS

- 2.1 One employee in the Community Services team is currently on long-term sick. The team are using existing staff to cover.

3. PEOPLE MANAGEMENT

Engagement

- 3.1. Quarterly All-Staff meeting dates have been set for the year. These are held on 2 different days, at 2 different times and 2 different venues to enable as many staff to attend as possible. We also record one of the sessions and share this on MS Teams to allow anyone who was unable to attend in person to view it.

- 3.2. The Staff Away Day is booked for 6 October 2026 at the Grove Theatre. The day is being facilitated by a company called Council Culture and the theme is based on our Value 'Teamwork'. The day will comprise of a mix of training, activities, and games all based around the theme of Teamwork and will also include the Annual Staff Awards.
- 3.3. The HR & Payroll Manager is proactively trying to improve engagement using MS Teams, celebrating staff wins, sharing news and sending reminders. The Celebrations app via Perkbox is also being trialed.

Training

- 3.4 Staff training for the year has now been processed and booked. The training budget for 2026/2027 has now been fully allocated. Training that could not be authorised this year is being costed and will be considered as part of the 2027/2028 budget setting process.
- 3.5 Mandatory training for this year has been programmed in. Emergency First Aid at Work training has been booked for September. DSE training has been allocated to all staff and will be followed-up by the Corporate Performance & Compliance Manager by completing DSE workplace assessments for each individual.

Health and Wellbeing

- 3.6 The cemetery team are holding a Macmillan Coffee Morning in September.
- 3.7 The HR & Payroll Manager has signed up to participate in Tech Timeout Tuesday again this year. It is held in December and encourages staff to pledge to put down their devices for at least an hour during the day. This was well received last year by all staff that participated.

4. ENHANCED STAFF BENEFITS

Stream

- 4.1. 25 eligible staff are currently enrolled to use Stream to enable them to access their wages early. A breakdown of how they are using the app can be found below:

	Budgeting	Saving	Flexible Pay	Education
Feb	13	13	8	0
Mar	14	13	6	0
Apr	12	13	5	0
May	16	13	6	0
June	12	13	6	0
July	13	13	5	0

Perkbox (Formerly Vivup)

- 4.2. 27 eligible staff are currently registered to use the Perkbox app. There are currently 19 active orders from the Home & Electronics option, where household items are purchased, and repaid monthly, interest free, directly from their wages.
- 4.3. Following Vivup's merger with Perkbox, the Council's account has been transferred to Perkbox. The benefits remain unchanged and continue to be provided at no cost to the Council. Staff now access these benefits through the Perkbox app

Octopus Electric Vehicles

- 4.4. Three electric vehicles have now been leased via the scheme.

5. IMPROVEMENTS AND PROJECTS

- 5.1 The HR & Payroll Manager is currently updating the exit procedure to ensure that it is robust and provides useful information rather than a tick-box exercise.
- 5.2 The Employment Rights Bill has now become law, and Council policies will need to be updated to reflect changes taking effect in 2026. From 1 July 2026, employees will be able to bring an unfair dismissal claim after six months' service, rather than the previous two-year qualifying period. The Council's standard terms and conditions have been updated accordingly, and a more robust induction process has been introduced.
- 5.3 The Violence at Work policy has been completed and is to be reviewed and recommended for approval by the Committee later in this meeting.
- 5.4 The HR & Payroll Manager is researching the introduction of more formal long-term sick procedures, a work experience policy and application form and the need for a tipping policy.
- 5.5 The Council's HR and Health and Safety support contract with Worknest is due to expire in March 2027. Officers are preparing the scope of requirements and will invite companies to quote for one or both contracts early in the autumn. This will allow sufficient time for information to be transferred smoothly if the Council appoints a new supplier.

6. APPENDICES

- 6.1 None

7. BACKGROUND PAPERS

- 7.1 <https://www.acas.org.uk/employment-rights-bill>
- 7.2 <https://www.gov.uk/government/publications/employment-rights-bill-factsheets>

8. AUTHOR

Kelley Hallam – HR & Payroll Manager
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DUNSTABLE TOWN COUNCIL

PERSONNEL SUB-COMMITTEE

THURSDAY 10 SEPTEMBER 2026

POLICY UPDATES

Purpose of report: For Members to recommend the adoption of the Violence and Aggression at Work policy and the acceptance of the minor amendments of the policies listed in the report to the Finance and General Purposes Committee

1. RECOMMENDATIONS

- 1.1. That Members recommend to the Finance and General Purposes Committee the adoption of the Violence and Aggression at Work policy.
- 1.2. That Members recommend to the Finance and General Purposes Committee that the reviewed policy amendments be accepted.

2. BACKGROUND

- 2.1 Dunstable Town Council regularly reviews all of its policies and procedures, including annual audits from Worknest, the Council's HR and H&S Consultants, making amendments or introducing new policies as required or deemed necessary.

3. VIOLENCE AND AGGRESSION AT WORK POLICY

- 3.1 The introduction of a Violence and Aggression at Work Policy is necessary to ensure that Dunstable Town Council has clear arrangements in place to help prevent, manage and respond to incidents of violence, aggression, abuse or threatening behaviour connected with work.
- 3.2 The policy will support a consistent approach to reporting, recording and managing incidents, while providing employees and managers with clear guidance on the steps to take before, during and after an incident.
- 3.3 Establishing a clear Violence and Aggression at Work Policy will help promote a safe working environment, support employees who may be affected by incidents, and reinforce the Council's commitment to protecting staff, Members, contractors and others carrying out Council business.

4. GENERAL POLICY REVIEW

- 4.1 Officers regularly review Council policies to ensure they remain current, accurate and fit for purpose. Where only minor amendments are required, and these do not alter the body, principles or overall intent of the policy, the changes are made to keep the policies up to date. Members are asked to consider and agree the reviewed policies so that they continue to reflect current practice and remain formally adopted by the Council.

4.2 Summary of Policy Amendments

Appendix	Policy	Key Changes Made to Policy
2	Subsistence Payments	- Added that ordinary commuting, routine workplace attendance and personal costs are excluded. - Wording updated to reflect that NJC subsistence rates are now locally determined. - Stronger requirements for prior approval, receipts, supporting evidence and authorised sign-off. - Added safeguards to prevent duplicate or inappropriate claims, especially where meals are already provided. - Added a new table of the Subsistence Rates as recommended by HMRC with maximum claim amounts and qualifying conditions.
3	Honorarium and Acting-Up	- Added that payments must be applied consistently and transparently. - Added reference to the employee's contract, Council pay arrangements, the Equality Act 2010 and NJC terms.
4	Post Entry Training Scheme	- Updated the Green Book reference to use the current title of the National Agreement - Strengthened the equal access wording to include equality of opportunity and removal of discrimination. - Added that only costs approved in advance and actually incurred by the employee will be eligible for reimbursement or recovery. - Updated job titles
5	Fraud, Bribery & Corruption	- Updated the policy title to Fraud, Bribery and Corruption Policy. - Added current legislative references, including Fraud Act 2006, Bribery Act 2010, Public Interest Disclosure Act 1998, Localism Act 2011 and data protection legislation. - Replaced outdated CRB wording with DBS. - Strengthened prevention controls, including risk assessment, internal controls, gifts/hospitality, conflicts of interest and audit oversight. - Added modern fraud risks such as mandate fraud, phishing, cyber-enabled fraud, bank account change fraud and impersonation scams.

		Corrected outdated wording, duplicated titles and minor drafting issues.
6	Capability Policy	- Updated the outdated Data Protection Act 1998 reference to UK GDPR and Data Protection Act 2018. - Added wording to confirm reasonable adjustments will be considered throughout the process. - Strengthened the suspension wording so it is only used where necessary, for a clear reason, and kept under review.
7	Complaints Procedure	Reference to the Council's Vexatious Complaints included.

- 4.3 At the last meeting of this Committee, Members requested that honorarium payment be reviewed to check it was still adequate. The HR and Payroll Manager researched other council's honorarium payments and found that Dunstable Town Council is on par with other similar councils.

5. EQUALITIES AND DIVERSITY IMPLICATIONS

- 5.1 The proposed Violence and Aggression at Work Policy supports a safe and respectful working environment for all employees, Members, contractors and others carrying out Council business. The policy updates strengthen fairness and consistency, including references to the Equality Act 2010.

6. FINANCIAL IMPACT

- 6.1. NONE

7. ENVIRONMENTAL AND BIODIVERSITY IMPLICATIONS

- 7.1. NONE

8. POLICY AND CORPORATE PLAN IMPLICATIONS

- 8.1. The recommendation accords with the Council's objective of 'continuing to improve the organisational management and efficiency of the Council'.

9. HEALTH AND SAFETY IMPLICATIONS

- 9.1 The Violence and Aggression at Work Policy supports health and safety by setting out arrangements to help reduce the risk of violence and aggression at work, respond appropriately to incidents, and ensure that affected employees receive suitable support.

10. HUMAN RESOURCES IMPLICATIONS

- 10.1 The Violence and Aggression at Work policy provides managers and employees with clear guidance on preventing, reporting, managing and reviewing incidents of violence, aggression, abuse or threatening behaviour connected with work. The

wider policy updates also support consistent, fair and compliant employment practices.

11. LEGAL IMPLICATIONS

- 11.1 Adopting the recommended changes will ensure that the Council's policies comply fully and clearly with current legislation.

12. APPENDICES

- 12.1 Appendix 1 – Violence and Aggression at Work Policy (DRAFT)
Appendix 2 – Subsistence Payments (REVIEWED)
Appendix 3 – Honorarium & Acting-Up (REVIEWED)
Appendix 4 – Post Entry Training Scheme (REVIEWED)
Appendix 5 – Fraud, Bribery & Corruption (REVIEWED)
Appendix 6 – Capability Policy (REVIEWED)
Appendix 7 – Complaints Procedure (REVIEWED)

13. BACKGROUND PAPERS

- 13.1 NONE

14. AUTHOR

Kelley Hallam – HR & Payroll Manager
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(Assisted by Co-Pilot)



VIOLENCE & AGGRESSION AT WORK POLICY

PURPOSE AND SCOPE

Dunstables Town Council is committed to providing a safe working environment and to protecting the health, safety and welfare of all employees, agency workers, contractors and others carrying out duties on behalf of the Council. The Council does not accept, and will not tolerate, abuse, aggression or violence towards employees. Such behaviour is not accepted as being “part of the job”. This policy applies to all work-related incidents, whether they occur on Council premises, in parks, public spaces, highway verges and other areas where staff regularly interact with members of the public, during site visits, while working alone, online, by telephone, in writing, or in any other circumstances connected with Council duties. It should be read alongside the Council’s Health and Safety Policy, Lone Working arrangements, Dignity at Work Policy, Sickness Policy, Vexatious Complaints Policy and Accident/Near Miss Reporting procedures.

DEFINITIONS

For the purposes of this policy, abuse, aggression or violence refers to any incident connected with an employee’s duties, whether occurring at work or elsewhere, where the employee feels verbally abused, threatened or attacked.

Where an incident involves unwanted behaviour related to a protected characteristic, employees must also follow Dunstable Town Council’s Dignity at Work Policy. Protected characteristics include age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation. Such incidents may amount to harassment, discrimination or victimisation and must be taken seriously.

POLICY OBJECTIVES

Any physical assault that injures a member of staff, whether causing physical pain, anxiety or stress, is a serious concern. Verbal abuse and threats can also have a significant emotional impact. If such incidents are not addressed, they may lead to low morale, poor performance and absence from work due to injury, depression or fear. The Town Council has a statutory duty to provide a safe system of work, a safe workplace and a safe working environment, including protecting employees from assault.

This policy applies to all incidents of work-related abuse, aggression and violence. Employees may be at increased risk where they:

- Handle or collect money or valuables
- Give advice or training
- Work alone or away from a workplace
- Carry out enforcement duties, site inspections or monitoring activities in isolated locations
- Deal with anti-social behaviour, fly-tipping, vandalism or unauthorised access.
- Work in parks. Cemeteries, allotments and public spaces
- Operate machinery, vehicles or specialist equipment in public areas
- Have contact with service users
- Handle public calls

The Council recognises the potential effect of abuse, aggression and violence on employees' physical and mental wellbeing. All incidents must be addressed promptly and proportionately. This policy covers:

- Physical attack - whether visible injury occurs or not
- Animal related incidents, including dogs or other animals being intentionally used as a threat, uncontrolled animals causing fear, intimidation or injury, or incidents involving dog attacks on employees.
- Verbal abuse - when an employee feels threatened or intimidated and the abuse is personally directed. This also includes cyber-aggression through texts, email messages or social networking sites
- Abusive, threatening or intimidating behaviour directed at employees carrying out maintenance activities, operating machinery or vehicles, undertaking inspections, enforcing site rules, or delivering Council services
- Attack or damage to property or belongings of the employee or the Council

This also includes any work-related incident involving an employee, or their family, which occurs away from the workplace because of the employee's Council duties.

MANAGERS' RESPONSIBILITIES

Line managers must implement this policy, make sure employees understand it, and take reasonable steps to prevent and respond to work-related abuse, aggression and violence. Line managers must:

- Treat any reports of work-related violence, threats or abuse seriously and respond to them promptly.
- Record incidents promptly and ensure employees involved receive appropriate support throughout the process.
- Set a positive example by reporting all incidents of violence and abuse and not tolerating abusive behaviour from customers and members of the public.
- Respond to and, where possible, resolve incidents, ideally before they escalate.

- Monitor incidences of violence and abuse and initiate appropriate action if more measures are needed.
- Provide or signpost appropriate support after an incident, including support for witnesses and consideration of temporary adjustments where needed.
- If an investigation is needed, work with the police and offer any assistance needed to help in their enquiries.
- Carry out risk assessments.
- Remain sensitive to employees' needs and the risks they may face in different work settings.

EMPLOYEES' RESPONSIBILITIES

All employees are responsible for their own behaviour and for complying with this policy.

Employees who work alone must remain alert to potential risks and avoid situations that may place them in danger. Where an individual feels threatened, intimidated or unsafe, they should remove themselves from the situation where practicable seek immediate assistance and report the incident to their line manager. No employee is expected to remain in a situation where they reasonably believe their safety may be compromised.

Employees must take reasonable care of their own health and safety and that of others who may be affected by their actions. Employees should:

- Recognise the potential for work-related violence and take action to resolve it early on.
- Take positive action and, for example, contact a line manager where there has been an incident previously or where there is reason to believe that an incident may occur
- Report all incidents of abuse, aggression, threats or violence as soon as possible, including when the incident occurred, who was involved and any relevant circumstances.
- Be supportive of colleagues who are victims or witnessed work-related violence.
- Suggest additional measures to line managers which might help to prevent and manage work related violence.
- Make use of any infrastructure or technology to support their work including use of phones, radios and lone working devices.
- Act in a way that does not incite or increase the likelihood of violence. Any staff member found to be encouraging or inciting violence may be subject to disciplinary action.
- Work with line managers and Union Representatives, where relevant, to prevent, address, report and respond to incidents of work-related abuse, aggression or violence.

PREVENTATIVE MEASURES

These guidelines apply to all services but can be adapted to meet specific needs.

Reception areas

The way in which people are received sometimes affects how they react. Reception areas should have easy access, good lighting and an inviting atmosphere.

If people are kept waiting, employees should explain the reason and apologise where appropriate. If an employee believes a situation may become violent, they should ask a senior employee for assistance.

Property and cash

While protecting property and cash is important, employee safety must always come first. If violence is directed only at property, employees should use their judgement before intervening. Where there is a risk of personal injury, they should not intervene but should try to contain the situation in a restricted area and call for assistance.

Severe disturbances or 'sit-ins'

If someone refuses to leave, employees must get help from a colleague and, if necessary, call the Police.

Operational and Outdoor Working

Employees working in parks, cemeteries, allotments, sports facilities and public open space should:

- Maintain awareness of their surroundings
- Avoid working alone in higher risk situations where this can be reasonably avoided
- Use phones and personal safety devices where provided
- Withdraw from situations involving aggression, threats or intimidation where it is safe to do so
- Report locations or individuals associated with repeat incidents

People with dogs

Sometimes people encourage their dogs to behave aggressively. Employees must report and record such incidents should they occur including uncontrolled dogs, refusal of owners to control their dog, threatening behaviour by owners if challenged about dog control and dog attacks. This will alert other employees to potential danger.

The Dangerous Dogs Act 1991 requires owners to keep their dogs under control. An owner may be guilty of an offence if their dog:

- is dangerously out of control in a public place, or
- causes fear or apprehension in a place where it shouldn't be, and which isn't public property.

If the dog injures anyone, the owner may be guilty of an aggravated offence. In either case, the Police can take action against the owner.

DEALING WITH VIOLENT INCIDENTS

Violence cannot always be predicted, although situations often escalate gradually. All threats of violence must be taken seriously. As people respond differently, there is no single correct approach; however, if you feel threatened, try to remain calm and defuse the situation where it is safe to do so.

It is important to be perceptive and 'read' situations. Try:

- to avoid arguing
- to be careful in what you say and how you say it
- to not be provocative
- to not swear

Make sure you know how to get help or leave safely if needed. Although these situations can be stressful, try to remain calm and avoid panicking or overreacting. Look for early warning signs so that violent behaviour can be prevented, or direct confrontation avoided where possible. If the situation escalates, leave immediately and get help.

REPORTING AND ACTION FOLLOWING AN INCIDENT

1. Contact the Police immediately where there is physical violence, a serious threat, criminal damage, intimidation or an immediate risk to safety.
2. Move to a place of safety and seek assistance where needed.
3. Report the incident to a line manager or Head of Service as soon as possible.
4. Complete the incident report form in Appendix 2.
5. Seek first aid or medical attention where required.
6. Record follow-up actions, support provided, lessons learned and any further control measures required.

Employees

Employees involved in an incident must inform their line manager or Head of Service as soon as possible and complete the incident report form in Appendix 2. Where there is immediate danger, physical violence, a serious threat or criminal damage, the Police must be contacted immediately. First aid or medical attention must be sought where required.

Managers

Managers must ensure that cases involving assault, physical violence, severe disturbance, serious threats, harassment, intimidation or criminal damage are reported to the police as soon as possible where there is an immediate risk to safety or where a criminal offence may have occurred.

Line managers must investigate incidents fully and The Police may also wish to take separate statements.

If the incident involves physical violence, injury, a near miss or psychological impact, managers must also complete the relevant Accident/Near Miss Report form and consider whether the incident is reportable under health and safety reporting requirements.

The line manager is responsible for confirming that the incident has been reviewed, follow-up actions have been recorded, Worknest has been updated where required, and any escalation to SMT or HASAG has been completed.

Specific courses of action, depending upon the type of incident, are available in Appendix 1.

Employees must be kept updated about relevant actions or outcomes throughout the process, subject to confidentiality and data protection requirements.

LEGAL ADVICE AND ASSISTANCE

If an employee is assaulted whilst carrying out their duties, and the Police take no action, the Town Council may seek professional advice to decide whether or not to prosecute the assailant if it considers a successful prosecution is possible and justified. An employee can also take a private action, either through the Criminal or Civil Courts, with assistance from their trade union or a private solicitor.

SICKNESS PAYMENTS

Injury as a result of an assault at work will be treated as an industrial injury, and occupational sick pay will be paid as per the Council's Sickness Policy. It is therefore important that abuse, aggression and violence incidents are reported to your line manager.

COUNSELLING AND SUPPORT

The welfare of employees is of paramount importance. An employee who suffers violence must be treated sympathetically, and their immediate needs attended to before the more formal process of recording and reporting the incident. Employees may choose to use the Council's counselling service.

TRAINING

Line Managers are responsible for identifying their employees' training needs, including the requirement for conflict management training. Any employees requiring further, or refresher training should contact their line manager.

POLICY REVIEW AND OWNERSHIP

This policy will be reviewed periodically, or sooner where there are legislative changes, organisational changes, significant incidents, or lessons learned from incident reporting.

APPENDIX 1

Specific course of action for managers following an incident

Managers should use the table below as a practical guide and seek specialist advice where the circumstances are complex, serious or repeated. Legal references and reporting thresholds, including police referral and health and safety reporting requirements, should be checked periodically to ensure they remain current.

Incident	Legislation	Manager's Actions
Actual Physical Assault.	Offences Against the Person Act 1861	1) Contact the police immediately where there is an ongoing risk or a criminal offence may have occurred. 2) Ensure the incident report form is completed. 3) Review the incident with the employee and identify support, training or further control measures required.
Threat of violence or abuse in public place.	Public Order Act, ss. 4, 4A and 5 and Protection from Harassment Act	1) Where safe, seek to calm the situation and ask the person to leave*. If the risk continues, contact the police. 2) Report the matter to the police where there is intimidation, a serious threat, harassment or risk to safety. 3) Ensure notes are taken from any witnesses. 4) Ensure the incident report form is completed. 5) Review the incident with the employee and identify support, training or further control measures required. *If the perpetrator is a minor in our care, do not ask to leave but call the next of kin.
Threat to kill or threats to property.	Offences against the Person Act 1861	1) Report the matter to the police immediately. 2) Ensure notes are taken from any witnesses. 3) Ensure Incident Report form is completed. 4) Review the incident with the employee and identify support, training or further control measures required.
Threat of violence or abuse in non-public place, e.g., in assailants' home or on their property, including abusive correspondence.	Protection from Harassment Act and Anti-Social Behaviour Act 2003	1) Ensure the incident report form is completed. 2) Review the incident with the employee and identify support, training or further control measures required. 3) If a further incident occurs involving the same person, prepare a witness statement

		covering both incidents and provide it, with any relevant correspondence, to the police where appropriate. 4) Ensure any further incident report form is completed. 5) Review the further incident with the employee and identify support, training or further control measures required.
Shouted or sworn at in person or over the telephone/abusive correspondence.	Anti-social Behaviour Act 2003	1) Make detailed notes of the incident, including the words used where possible. 2) Ensure the incident report form is completed. 3) Review the incident with the employee and identify support, training or further control measures required. 4) For repeat incidents assess if the Council's Vexatious Complaints Policy is appropriate and start that process. 5) If the behaviour continues, seek legal or specialist HR advice.
Customer is intimidating but is not abusive or swearing.	Anti-social Behaviour Act 2003	1) Make detailed notes of the incident, including the behaviour observed and any effect on employees. 2) Ensure the incident report form is completed. 3) Review the incident with the employee and identify support, training or further control measures required. 4) Repeat incidents should be assessed by the line manager with the member/s of staff in the context of the situation.
Customer is angry but not abusive or swearing.	None	If the employee has concerns about managing this type of situation, review whether additional support, guidance or training is required.

APPENDIX 2

Abuse, Aggression & Violence Incident Report

Employee Details

Name	
Job Title	
Service Area	

Location/Site			
Do you wish your identity to be kept confidential	Yes	No	

Details of Incident

Date	
Time	
Location	

What Happened (Tick as appropriate)?

Verbal Abuse		Threat of Violence		Physical Violence	
Other e.g. Intimidating behaviour		Damage to Public Property		Damage to Council Equipment	
Anti-Social Behaviour		Fly-Tipping		Dog Related	
Details of Injury or Damage:					
Describe what happened:					
Date		Employees Signature			

Details of Aggressor (Answer any questions you can, if unsure leave blank and state in the comments section)

Name		Male	Female
Adult (18 or Over)	Y / N	Child (Under 18)	Y / N
Do you know if the aggressor:			
Was under the influence of alcohol?	Yes	No	
Was under the influence of drugs?	Yes	No	
Appeared to be unwell or distressed?	Yes	No	
Has mental health issues and/or having a mental health crisis?	Yes	No	
Has Special Educational Needs (SEN)?	Yes	No	
Please provide any other relevant details or comments:			

Witness Details (if applicable)

Name	
Telephone	
Email	
Address	

Senior Officers Initial Actions (tick as appropriate)

First Aid required	Yes	No
Hospital treatment required	Yes	No
Police informed	Yes	No
If yes, what action is proposed?		
Name		Job Title
Signature		Date

Follow Up Action (Tick as appropriate)

To be completed by the CP&CM in liaison with SMT and reported to HASAG where appropriate. The responsible officer must ensure follow-up actions, lessons learned and any further control measures are recorded and monitored to completion.

HSE Reportable?	Yes	No
Detail entered on Worknest?	Yes	No
Date entered on Worknest?	Date	
Were existing procedures followed?	Yes	No
Were existing procedures adequate?	Yes	No
Comments:		

Details of any other actions carried out:	
Name	
Job Title	
Signature	
Date	



SUBSISTENCE PAYMENTS

Subsistence payments are intended to reimburse employees for reasonable and necessary additional meal costs incurred while undertaking approved Council duties away from their normal place of work. Subsistence is not a general daily allowance and will only be paid where the employee is required to be away on qualifying Council business and has incurred additional expenditure that would not otherwise have arisen. Payment cannot be made without appropriate supporting evidence, including receipts where required.

Claims may be made only where the activity is approved Council business, and the employee is necessarily prevented from taking a meal at home or at their normal workplace. Ordinary commuting, routine attendance at the normal workplace, and personal expenditure do not qualify for reimbursement.

The Council will determine subsistence rates locally, taking account of the National Joint Council for Local Government Services Green Book, HMRC requirements and any relevant Council-approved rates. The NJC no longer publishes nationally agreed subsistence rates; therefore, rates are subject to local determination and review.

Reimbursement will be for actual expenditure incurred, up to the agreed Council limit. Employees must not seek to profit from subsistence claims, and any claim must be reasonable, necessary and directly connected with Council business.

Subsistence must not be claimed where the Council, organiser or host has already provided or paid for the relevant meal or refreshment, including where meals are included as part of a conference, training course, accommodation booking or event fee.

Payment of subsistence is subject to the employee:

- Obtaining prior approval for the approved Council business activity and any anticipated expenditure, unless exceptional circumstances apply.
- Claiming only for qualifying Council business activities, including conferences, training, meetings, events or other approved duties, and in accordance with this policy and the Council's expenses procedures.
- Submitting the claim form within 30 days of the event, activity or duty.
- Providing receipts where required and retaining sufficient details to evidence the date, destination, business purpose, duration and amount claimed.
- Completing all relevant sections of the claim form accurately, totalling the claim and submitting it for countersignature by the authorised officer.

The Council reserves the right to decline or recover any claim that is incomplete, unsupported, excessive, duplicate, outside the policy requirements or not connected with approved Council business.

Appendix 1 – Subsistence Rates

The following rates set out the maximum Council-approved subsistence payments that may be claimed where the conditions in this policy are met. These rates are based on HMRC benchmark scale rates and are subject to review by the Council. Payment will only be made where the employee is undertaking an approved Council business activity, including conferences, training, meetings, events or other approved duties, and has incurred additional expenditure.

Type of claim	Qualifying condition	Maximum amount
One meal allowance	Employee is away from their normal place of work on approved Council business for at least 5 hours and incurs the cost of a meal.	£5
Two meal allowance	Employee is away from their normal place of work on approved Council business for at least 10 hours and incurs the cost of meals.	£10
Late evening meal allowance	Employee is required to work later than usual, the approved Council business activity continues after 8 pm, and the employee incurs the cost of an evening meal which would normally have been taken at home.	£15
Breakfast allowance	Employee is required to leave home earlier than usual and before 6 am for an approved Council business activity and incurs the cost of breakfast after the journey has started.	£5
Overnight subsistence	Employee is required to stay away overnight on approved Council business. Accommodation must be booked in accordance with Council procedures and supported by receipts.	Actual reasonable cost, subject to prior approval

The maximum daily payment must not exceed the applicable qualifying rate and must not result in duplicate claims for the same meal. Where a meal or refreshment has been provided or paid for by the Council, organiser, host or accommodation provider, the relevant allowance must not be claimed.

The Council may review and amend these rates from time to time to reflect changes in HMRC guidance, NJC Green Book recommendations, local arrangements or operational requirements.



HONORARIUM AND ACTING UP POLICY AND PROCEDURE

INTRODUCTION

Dunstable Town Council recognises that there may be times when an employee is 'acting up' or has taken on significant extra duties in the absence of a manager or a work colleague. This may be due to delays in recruitment or a member of staff being on long-term sick leave. On these occasions, the Council wishes to recognise the extra work this employee is undertaking through the payment of an honorarium or acting up allowance.

PRINCIPLES

An employee who is asked by a Head of Service or the Town Clerk and Chief Executive to undertake the full duties and responsibilities of a higher graded post for a continuous period of at least four weeks will be eligible to receive acting up pay equivalent to the salary for the post temporarily occupied, subject to approval under this procedure.

Any honorarium or acting up allowance must be applied consistently, transparently and in line with the employee's contract of employment, the Council's pay and grading arrangements, the Equality Act 2010, and any applicable National Joint Council for Local Government Services conditions.

If the duties and responsibilities of the higher graded post are shared amongst more than one officer, the entitlement outlined above does not apply.

Where an employee performs additional duties outside the scope of their substantive post, and those duties are considered to be exceptionally onerous, an honorarium may be granted. The payment will be capped at a one-off payment of 7.5% of the employee's annual salary, calculated on a pro-rata basis where the additional duties have been undertaken for only part of the financial year. Payment will normally be made at the end of the financial year unless otherwise approved.

It is intended that no extra duties should be undertaken for long periods of time and six months will be the maximum. Should an employee need to cover the duties of another post for longer than six months, then a full report will be made to the Finance and General Purposes Committee outlining the Town Clerk & Chief Executive or Head of Service proposal for future management of the specific service area.

PROCEDURE

The following procedure should be applied when a situation arises that may involve an employee undertaking additional duties or acting up into a higher post as outlined above:

The employee's Head of Service must first speak with the employee asked to undertake additional duties to seek their agreement.

Priorities, targets and workloads must be agreed between Head of Service and employee.

Should the payment of an honorarium be required to cover a vacant post, the employee's Head of Service or the Town Clerk & Chief Executive must make a case to the Finance and General Purposes Committee.

Should the payment of an honorarium be required to cover for extended sick leave or maternity absence, the employee's Head of Service must submit a request to the Finance and General Purposes Committee.

Once the honorarium is agreed, the agreement will be put in writing to the employee. If the payment is made retrospectively then a written explanation of why the award has been made will also be issued to the employee.

If the employee is continuing to cover the extra duties after six months, the agreement must be reviewed and a request to extend it be put to the Finance and General Purposes Committee.

FINANCIAL IMPLICATIONS

The case for awarding an honorarium and acting up allowance will always need to be made to the Finance and General Purposes Committee by the Head of Service or Town Clerk & Chief Executive.

When making the case to award a payment the report will need to show exactly where the finances are to be identified. In the first instance this will have to be shown from revenue savings relating to the specific service area within the given financial year. Failing this the finances will have to be identified from general revenue savings. The use of any reserve funding should only be used in extreme cases.



POST ENTRY TRAINING SCHEME

INTRODUCTION

Whilst the Council seeks to appoint qualified staff wherever possible, it is policy to encourage staff to study for approved qualifications which are considered beneficial to the Council's service.

All learning, development and training provision will be planned, delivered and monitored on the basis of equal access, equality of opportunity and the removal of discrimination. Training should meet the needs of the Council as identified in service plans and the Continuous Performance Review scheme.

This Council's Post Entry Training Scheme follows guidance set out in the National Agreement on Pay and Conditions of Service of the National Joint Council for Local Government Services, commonly known as the Green Book, as updated from time to time.

FINANCIAL ASSISTANCE

(For Academic and National Vocational Qualifications)

- 1) Qualifications are required to be recognised and appropriate professional, technical or administrative qualifications, which are deemed necessary for staff to perform existing, or future, responsibilities.
- 2) Facilities under the scheme are granted for undertaking an approved course of study authorised by the Town Clerk and Chief Executive.
- 3) Qualification Training expenses may include tuition costs, examination fees, travel and subsistence expenses, and required books or materials. NVQ costs may include administration and assessor meetings. Only costs approved in advance and actually incurred by the employee will be eligible for reimbursement or recovery.
- 4) Course and examination fees will be paid direct by the Council.
- 5) Claims for travel, subsistence and other expenses should be claimed on the standard form provided, ensuring that receipts are attached where available and necessary signatures are obtained.
- 6) Payment for books up to the value of £60 may be reimbursed in any one course year on condition that receipts are submitted.

7) Employees who are granted financial assistance to study for an approved qualification will be required to sign an undertaking to remain in the service of Dunstable Town Council for two years following the successful completion of their course of study.

8) Employees who fail to sit an examination within a reasonable period, fail to submit the required assignments/portfolios or fail to show satisfactory progress in their studies or who discontinue the course will be required to refund qualification training expenses as determined in the particular case.

9) **A separate application is required prior to the start of each academic year of study for a Professional Qualification Course.** Continuing assistance under this scheme, e.g. a second year of study, a second attempt at an examination, or a succeeding course will only be granted if the Council is satisfied that appropriate progress has been made or assistance to resit an examination is warranted.

10) A single application is required for an individual undertaking a NVQ. Continuing support for a NVQ will only be given if the individual is making satisfactory progress.

11) Employees leaving the Council during their period of study will be required to refund all Qualification Training fees paid to the date of their leaving.

12) Employees leaving the Council within the post qualifying period of two years to take up alternative employment will be required to reimburse the Council for Qualification Training Expenses

- a. If leaving within the first year of the post qualification period, all Qualification Training expenses are required to be repaid.
- b. If leaving within the second year, reimbursement will be made on a pro rata basis. The amount to be repaid will be calculated on a monthly basis from when the qualification has been awarded i.e. if the employee has completed 14 months of service, since qualifying, then the balance of 10/24ths of the total cost paid by the Council must be repaid.

13) The post qualification period of two years commences from the date of successful completion of the qualification.

FRAUD, BRIBERY AND CORRUPTION POLICY

INTRODUCTION

This policy sets out Dunstable Town Council's commitment to preventing, detecting and responding to fraud, bribery, corruption and related financial irregularity. It supports sound governance, protects public funds and provides clear reporting and investigation arrangements. Dunstable Town Council, its councillors and employees, are committed to the highest standards of personal and corporate ethics and compliance with laws and regulations. Integrity and effort are valued, not just in financial performance, in all dealings with staff, customers and suppliers. The objective is to be open and honest in all dealings, internal and external.

This policy applies at every level regardless of seniority. Non-compliance is considered to be a disciplinary offence and would be dealt with accordingly.

The Council has adopted the Model Code of Conduct and is committed to sound corporate governance. It supports the Committee on Standards in Public Life "Seven Principles of Public Life" for the conduct of Council Members and employees, as enunciated by the Nolan Committee: namely:

- **SELFLESSNESS** - Holders of public office should act solely in terms of the public interest. They should not do so in order to gain financial or other material benefits for themselves, their family, or their friends.
- **INTEGRITY** - Holders of public office should not place themselves under any financial or other obligation to outside individuals or organisations that might seek to influence them in the performance of their official duties.
- **OBJECTIVITY** - In carrying out public business, including making public appointments, awarding contracts, or recommending individuals for rewards and benefits, holders of public office should make choices on merit.
- **ACCOUNTABILITY** - Holders of public office are accountable for their decisions and actions to the public and must submit themselves to whatever scrutiny is appropriate to their office.
- **OPENNESS** - Holders of public office should be as open as possible about all the decisions and actions that they take. They should give reasons for their decisions and restrict information only when the wider public interest clearly demands.
- **HONESTY** - Holders of public office have a duty to declare any private interests relating to their public duties and to take steps to resolve any conflicts arising in a way that protects the public interest.
- **LEADERSHIP** - Holders of public office should promote and support these principles by leadership and example.

This Fraud, Bribery and Corruption Policy is designed to protect the Town Council against fraud, bribery, corruption and other financial irregularity, whether arising from within the Town Council or from external parties. The Town Council is committed to effective arrangements which:

- Encourage prevention
- Promote detection
- Identify a clear pathway for investigation

The Town Council expects Members and employees at all levels to lead by example in ensuring adherence to legal requirements, rules, procedures and practices.

The Town Council also expects that individuals and organisations (e.g. suppliers, contractors and service providers) that it comes into contact with, will act with integrity and without thought or actions involving fraud or corruption.

This policy is based upon procedures and controls designed to prevent, deter, detect and respond to attempted or actual fraud, bribery or corruption. These cover:

- Culture
- Prevention
- Detection and investigation
- Training

LEGAL AND GOVERNANCE FRAMEWORK

The Council will have regard to relevant legislation and guidance, including the Fraud Act 2006, Bribery Act 2010, Theft Act 1968, Public Interest Disclosure Act 1998, Police and Criminal Evidence Act 1984, Localism Act 2011, data protection legislation, the Council's adopted Code of Conduct, Standing Orders, Financial Regulations, whistleblowing arrangements and any relevant external audit requirements.

The Council will also have regard to recognised public-sector counter-fraud principles, including proportionate risk assessment, clear reporting routes, record keeping, prevention, detection, training, monitoring and review.

CULTURE

The Town Council is determined that the culture and tone of the organisation is one of honesty and integrity and opposition to fraud and corruption.

There is an expectation and requirement that all individuals and organisations associated in whatever way with the Town Council will act with integrity, and that Town Council employees at all times will lead by example in these matters.

The Town Council employees are an important element in its stance on fraud and corruption and they are positively encouraged to raise any concerns that they may have on these issues where associated with the Town Council's activity.

They can do this in the knowledge that such concerns will be treated in confidence and will be properly investigated. Reporting should be through one of the persons listed:

- Town Clerk & Chief Executive
- Head of Finance (Responsible Financial Officer)
- Head of Grounds and Environmental Services
- Head of Community Services
- Internal Auditor
- External Audit

Members of the public and third parties are also encouraged to report concerns.

The Town Clerk & Chief Executive will be responsible for following up any allegation of fraud or corruption received and will do so through clearly defined procedures set out in this document. The Town Clerk & Chief Executive is expected to deal swiftly and firmly with those who defraud or are corrupt. The Town Council, including Members, will be robust in dealing with financial malpractice.

There is, of course, a need to ensure that any investigation process is not misused and, therefore, any abuse (such as raising unfounded malicious allegations) may be dealt with as a disciplinary matter.

The Town Council has a formal Whistleblowing Policy. Employees who raise genuine concerns in good faith will be supported and will not be subjected to detriment because they have reported a concern. Where a qualifying disclosure is made, the employee may be protected under the Public Interest Disclosure Act 1998. Concerns raised maliciously, knowingly falsely or for personal gain may be considered under the Council's disciplinary procedure.

PREVENTION

Prevention will be achieved through:

- Robust recruitment, induction and staffing policies.
- Clear responsibilities for councillors, employees, contractors and suppliers.
- Effective internal control systems, segregation of duties and authorisation procedures.
- Registers for interests, gifts and hospitality.
- Fraud, bribery and corruption risk assessment in higher-risk areas.
- Regular review of Financial Regulations, Standing Orders and audit recommendations.
- Partnership working with auditors, insurers, Police and relevant public bodies where appropriate.

Employees

As an employer, the Town Council is entitled to expect, and obliged to maintain, high standards of conduct among its employees to ensure that public confidence in their integrity and impartiality is not undermined. The public is entitled to demand conduct of the highest standard and that employees work honestly and without bias in order to achieve the Town Council's objectives. Employees are expected to maintain the duty of confidentiality. Information obtained in the

course of their duties should not be disclosed to a third party, and should not be used for the employee's own benefit or that of others.

The Town Council recognises that a key preventative measure in the fight against fraud and corruption is to take effective steps at the recruitment stage to establish, as far as possible, the propriety and integrity of potential employees. In this regard temporary and contract employees are treated in the same manner as permanent employees.

The Town Clerk & Chief Executive should ensure that recruitment procedures are followed and, in particular, that appropriate references and pre-employment checks are obtained before employment commences. Where the post requires it, appropriate Disclosure and Barring Service (DBS) checks must be obtained in line with safer recruitment requirements.

Employees of the Town Council are expected to follow the Council's Officer Code of Conduct, Financial Regulations, Standing Orders, procurement rules, IT and data protection requirements, and all relevant policies relating to gifts, hospitality, interests, confidentiality and whistleblowing.

Councillors

Councillors are expected to operate honestly, lawfully, transparently and without bias. Their conduct is governed by:

- The Council's adopted Member Code of Conduct
- The Localism Act 2011 and associated arrangements for registering and declaring interests
- Dunstable Town Council's Standing Orders
- Dunstable Town Council's Financial Regulations
- Relevant policies on gifts, hospitality, interests, procurement, complaints and whistleblowing

Councillors must be alert to conflicts of interest, register and declare interests as required, withdraw from decision-making where appropriate, and avoid any action which could improperly influence Council business or procurement decisions.

These codes and regulations are subject to review, Councillors will be closely involved in the process, and will be fully advised as to their responsibilities.

Internal Control System

The internal control system comprises the financial, operational and managerial systems established within the Town Council to ensure that its objectives are achieved lawfully, economically, efficiently and effectively. The Council's Financial Regulations provide the framework for financial control and should be reviewed against current sector guidance, including relevant model financial regulations for parish and town councils. Under Financial Regulations, the Responsible Financial Officer is required to ensure that:

- Arrangements, guidelines and procedures for the proper administration of financial affairs are operated in accordance with Financial Regulations.
- There is an adequate and effective system of internal audit of the Council's accounting, financial and other operations in accordance with proper practices.
- The Town Clerk & Chief Executive shall make arrangements to monitor changes in legislation or proper practices and shall advise the Council of any requirement for a consequential amendment to financial regulations.
- The Town Council has developed, and is committed to continuing with, systems and procedures which incorporate efficient and effective internal controls. The existence, appropriateness and effectiveness of these internal controls are independently monitored by the Town Council's independent Internal Auditor.
- The Council will keep under review higher-risk areas such as procurement, contract management, payroll, expenses and mileage claims, grants, income collection, banking changes, online payments, payment cards, cyber-enabled fraud, phishing, impersonation scams, asset management and conflicts of interest.

Working in Partnership

Dunstable Town Council encourages the exchange of information between the Town Council and other agencies on national and local fraud corruption activity.

With the rapid increase in recent years of frauds perpetrated against a variety of local authorities and benefit agencies, usually involving fraudsters having multiple identities and addresses, the necessity to liaise between organisations has become paramount. The Town Council has existing liaison arrangements with:

- Internal Auditor
- External Auditor

Detection and Investigation

When fraud and corruption occur, systems should assist in revealing the occurrences, and people should be encouraged to do likewise. They must then be investigated in a fair and impartial manner.

Appendix A sets out the guidance on the processes for employees who wish to notify suspicions and how the Council's officers should respond.

Detection

The array of preventative systems, particularly internal control systems and Audit, within the Town Council generally should be sufficient in themselves to deter fraud, but they have also been designed to provide indications of any fraudulent activity.

It is often the alertness of employees and the public to such indicators that enables detection to occur and the appropriate action to take place when there is evidence that fraud or corruption may be in process.

Despite the best efforts of managers and auditors, many frauds are discovered by chance or "tip off", and the Town Council has developed a "whistle-blowing" policy to formalise such

arrangements to enable such information to be properly dealt with (included in the staff handbook).

Investigation

Depending on the nature and anticipated extent of the allegations, the Internal Auditor will normally work closely with the Town Clerk & Chief Executive, the Responsible Financial Officer and other agencies, such as the Police, to ensure that allegations are properly investigated and reported and, where appropriate, that maximum recoveries are made for the Town Council. The follow-up of any allegation of fraud, bribery or corruption will be through agreed procedures which ensure that:

- Matters are dealt with promptly
- All evidence is reported
- Evidence is sound and adequately supported
- All evidence is securely held
- Where appropriate, the Police and the Town Council's Insurers are informed
- The Town Council's Disciplinary Procedures are implemented
- The rules of natural justice are incorporated

The procedures and reporting lines are an integral part of the Town Council's Fraud Policy which ensures:

- Consistent treatment of information about fraud and corruption
- Proper investigation
- Restitution or compensation
- The optimum protection of the Town Council's interests

Where financial impropriety is discovered, referral to the Police is a matter for the Town Clerk & Chief Executive, in consultation with appropriate officers and advisers where necessary. In deciding whether to recommend referral, the following factors are taken into account:

- The amount of loss and duration of the offence
- The suspect's physical and mental condition
- Voluntary disclosure and arrangement for restitution
- How strong the evidence is

The Town Council's Disciplinary Procedure will be used as appropriate, irrespective of Police involvement or not.

Training

The Town Council recognises that the continuing success of its Fraud and Ethics Policy and its general credibility, will depend largely upon the effectiveness of its training programmes and the responsiveness of employees throughout the organisation.

To facilitate this, the Town Council supports the concept of induction training and continuous personal development training (particularly for employees involved in internal control systems) to ensure that their responsibilities and duties are regularly highlighted and reinforced.

The Town Council has in place a Disciplinary Procedure for all categories of its employees who are fully aware of the consequences of disregarding it.

Continuous Review of Policy

The Town Council has in place a clear network of systems and procedures to assist it in preventing, detecting and responding to fraud, bribery and corruption. These arrangements will be kept under review to ensure they remain proportionate, current and responsive to changes in legislation, proper practices, public-sector guidance, fraud risks and detection techniques.

The Council will maintain a continuous review of such arrangements through the Town Clerk & Chief Executive, Members, Internal and External Auditors, and will update the arrangements as required.

Dealing with Fraud, Bribery and Corruption

Introduction

Dunstable Town Council is committed to the values of probity and accountability, but the determined perpetrator will always find a way round systems and procedures. It is therefore necessary for the Town Clerk & Chief Executive to be aware of what is required in the event of being notified of a suspected fraud. This document sets out the process for persons who wish to notify any suspicions and also how the Town Clerk & Chief Executive will respond.

Actions Constituting Fraud

Fraud, bribery and corruption constitute many types of unacceptable behaviour. Under the Fraud Act 2006, fraud may include fraud by false representation, fraud by failing to disclose information and fraud by abuse of position. Bribery includes offering, promising, giving, requesting, agreeing to receive or accepting a financial or other advantage intended to induce or reward improper performance. Such behaviour may be perpetrated by external parties, employees, councillors or through collusion between internal and external parties. Examples include:

- Theft of Council property
- Forgery or deliberate alteration of any document eg. cheque, journal entry
- Destruction or removal of records to cover tracks
- Falsifying of expense claims
- Disclosing confidential information to outside parties, without authority, for personal gain
- Computer misuse
- Mandate fraud, bank account change fraud, phishing, impersonation scams or cyber-enabled fraud
- Offering, receiving or soliciting bribes, improper gifts, hospitality or other inducements
- Undeclared conflicts of interest in procurement, grants, appointments or decision-making

Notifying Suspected Fraud

Suspected fraud can be discovered in a number of ways but in all cases it is important that employees and elected members feel able to report their concerns and are also aware of the means by which they are able to do so.

The following reporting routes are available to employees, elected members, members of the public, suppliers and contractors who wish to report concerns.

If suspected fraud, bribery or corruption is discovered, it must be reported as a matter of urgency to the Town Clerk & Chief Executive, unless the concern relates to that postholder. The Town Clerk & Chief Executive will notify the relevant Committee Chairman where appropriate, bearing in mind that those notified may not be able to take part in any subsequent personnel matters. The issue will be reported in a way that protects confidentiality and avoids prejudging the allegation.

The Town Clerk & Chief Executive is ultimately responsible for all operations and as such, should be able to be contacted by an employee or elected member regarding suspicions they may have. If the suspicion is raised against the Town Clerk & Chief Executive, the matter should be reported to the Internal Auditor, who will report it to the Chairman of the Finance and General Purposes Committee or another appropriate councillor in accordance with the Council's governance arrangements.

If the concern relates to the Responsible Financial Officer, a senior manager, a councillor or another person involved in the normal reporting route, the concern should be reported to an alternative senior officer, the Internal Auditor, External Auditor or the appropriate committee chairman. Anonymous reports will be considered, although the Council's ability to investigate may be affected if further information cannot be obtained.

Independent Internal Auditor

The primary role of the Independent Internal Auditor is to report on the adequacy of systems and procedures. However, they are also charged with responsibility for being the usual means of investigating suspected fraud. The Internal Auditor has experience in fraud investigation and will always be receptive to discussing concerns raised by employees, elected members or the general public.

External Audit

The Council's external auditors have responsibilities within the current external audit framework applicable to local councils. They may review arrangements for governance, internal control, financial reporting and the prevention and detection of fraud, bribery and corruption. Relevant concerns should be reported to External Audit where appropriate and in accordance with audit requirements.

Initial Steps

Once fraud is suspected it is crucial that any investigation is conducted in a professional manner aimed at ensuring that the current and future interests of both the Authority and the suspected individual(s) are protected. The latter is equally important, as a suspicion should not be seen as guilt to be proved. To this end the Authority's disciplinary procedure will be invoked where necessary.

It is also crucial that the notifying employee does not feel threatened. As far as possible the Authority undertakes to protect the identity of such employees and will not release the source of notification at any time during the investigation. This has been formalised with the introduction of a "Whistleblowing Policy".

For each notified suspicion the Town Clerk & Chief Executive will appoint an "Investigating Officer", to be in charge of the investigation on a day-to-day basis. This will usually be the Internal Auditor, but each case will be judged on merit.

Suspension, where considered necessary, is a neutral act and is not a disciplinary sanction. Any decision to suspend must be proportionate, kept under review and managed in accordance with the Council's employment procedures.

Subsequent Steps

The Investigating Officer and Town Clerk & Chief Executive must:

- Initially assess whether there is a need for any employee to be suspended. The decision should be kept under review at all stages of the investigation.
- Identify an action plan. (What, who, when, how, where)
- Identify the reporting process (who by, to whom, when and how) to ensure that strict confidentiality is continuously maintained.

The Investigating Officer will:

- Open a file to record chronologically
 - Telephone conversations
 - Face to face discussions
 - Record/documents viewed
 - Tests undertaken and results

The file should be indexed and all details recorded no matter how insignificant they initially appear.

Digital evidence, emails, access logs, audit trails, financial records and system records should be preserved promptly and securely. Access to evidence should be restricted to those with a legitimate role in the investigation.

- Ensure the correct form of evidence is obtained and appropriately retained, witnessed and corroborated:
 - Prime documents
 - Certified copies
 - Physical items
 - Secondary evidence
 - Circumstantial
 - Hearsay

- Ensure interviews are conducted in the right manner. In particular, that the requirements of the Police and Criminal Evidence Act 1984 (as amended) are complied with when interviewing suspects.

Liaison with External Audit and the Police

External Audit

Each Local Authority has a duty to report all suspected frauds to its external auditors. This will be done by the Town Clerk & Chief Executive at the earliest opportunity.

Police

The Police will advise on the likely outcome of any intended prosecution. Initial contact with the Police should only be undertaken following discussion with the Town Clerk & Chief Executive. If the Police decide a formal investigation is necessary, all employees should co-operate fully with any subsequent requests or recommendations. All contact with the Police following their initial involvement will usually be via the Investigating Officer.

Where the Police decide to formally investigate this will not prejudice any internal disciplinary procedures; these should continue as normal. However, the internal investigation and the Police investigation should be coordinated to make maximum use of resources and information.

Interim Report

As soon as the initial “detection” stage of investigation has been completed an interim confidential report, which may be verbal, but is more likely to be written, should be made by the Investigating Officer to the Town Clerk & Chief Executive and any other Officer decided upon at the preliminary stage.

The interim report should set out:

- The findings to date
- The interim conclusions drawn from those findings; and
- Should seek approval to continue the investigation if this is appropriate.

If it is decided to continue the investigation then future reporting arrangements and any changes to the planned action should be confirmed.

Final Report

This report will supersede all other reports and be the definitive document on which management (in a disciplinary situation) and possibly the Police (in a criminal situation) will base their initial decisions.

The format of the final report will not always be the same as each case is unique, but will frequently set out:

- How the investigation arose
- Who the suspects are
- Their position in the Authority
- How the investigation was undertaken
- The facts and evidence that were identified
- Summary of findings and recommendations, both regarding the fraud itself and any additional work required on the system weaknesses identified during the investigation.
- Any lessons learned, control improvements, recovery action and training or awareness needs arising from the investigation.

Defamation

All reports must be sustained by the strongest evidence and avoid contents that could be considered to be defamatory in the event of the report being made public. Defamation in law is defined as:

'The publication (i.e. communication) of a statement which tends to lower a person in the estimation of right thinking members of society in general or which tends to make them shun or avoid that person.'



CAPABILITY POLICY AND PROCEDURE

POLICY STATEMENT

This procedure provides a framework for addressing poor performance arising from an employee's lack of capability to perform his or her job duties satisfactorily. The objective is to support the employee in making the necessary improvements to reach and maintain the required standard of performance.

It is recognised that appraisal and supervision meetings may not always succeed in achieving the required level of performance improvement and, in such situations, a more formal procedure is required. In circumstances where it is deemed that the employee is deliberately and/or willfully underperforming then the disciplinary policy and procedure will apply.

PROCEDURE

PURPOSE AND SCOPE

The procedure does not form part of the contract of employment.

The objective of this policy is to help and encourage employees to achieve and maintain acceptable standards of job performance and to ensure that Dunstable Town Council has fair and effective arrangements in place for dealing with poor work performance and capability matters. The Council is committed to ensuring that all staff have the appropriate skills, knowledge, competence and aptitude to undertake their role effectively.

Where employees are performing below expectations, the role of the line manager will initially be to bring this to the attention of the individual and to work closely with them to support them to improve performance to an acceptable level. The objective will always be to set out a constructive approach to achieving improved work performance through effective supervision, mentoring, support and training, and performance review and development. However, formal action may be necessary in some cases.

Whilst the Council will support employees who are underperforming, it is the employee's responsibility to take whatever action is necessary to improve their performance, including proactively seeking guidance where appropriate.

For the purpose of this policy an individual's capability to do their job is assessed by reference to their skills, qualifications, aptitude, health or any other physical or mental quality.

KEY PRINCIPLES

Managers' Responsibilities

In applying this procedure, managers are expected to:

- Ensure that all employees are aware of the performance standards expected from them and the consequences of failing to meet these standards.
- Deal with performance issues within one-to-one / supervision meetings in the first instance, which should be recorded and monitored.
- Deal with matters confidentially, promptly, in line with natural justice principles and in a non-discriminatory way.
- Seek Human Resources advice at all stages of the procedure in advance of any steps being taken.
- Ensure that any employee subject to this procedure has a current copy of the procedure.
- Keep an adequate and accurate record of all meetings within this procedure. Records will be treated as confidential and kept in accordance with the UK GDPR and Data Protection Act 2018.
- Consider the support required for employees to reach the desired performance standards.
- Ensure there are sound and demonstrable reasons to progress through the stages outline within this procedure.
- Observe good practice and consult with recognised Trade Unions where appropriate.
- Consider each case on its own merits in relation to the needs of the service.

Employees' Responsibilities

All employees have a responsibility to:

- Recognise the performance standards required from them in order to fulfil their role and ensure the needs of the service are met.
- Identify any support they require in order to meet the required performance standards.
- Make themselves available for meetings with management to discuss their performance.
- Work with managers constructively to address any underlying issues which may be affecting performance.
- Achieve the agreed targets within set timescales.

INFORMAL CAPABILITY PROCESS

Where an employee's performance does not meet the required standard, this should normally be discussed with the individual as part of the regular management/supervision process (e.g. one to one/supervision meetings), where standards required should be clarified, targets set and appropriate training/support should be agreed and implemented to assist the employee to reach the required standards.

The manager should communicate to the employee that they are within the informal stage of this policy and record this within the one-to-one/supervision meetings.

The aim of a meeting at this stage of the process is to try and help the employee rapidly address their under-performance in an informal manner. A problem-solving approach will be taken to address the situation. During the meeting:

- The employee will be provided with clear examples of the areas of under-performance which are causing concern.
- The employee will be asked to explore possible reasons for the performance shortfall.
- The standards of required job performance will be confirmed to the employee once more and the employee will be set a performance management action plan including short term objectives which they need to achieve by a specified timescale.
- Additional support required by the employee will be identified and where reasonable, provided by the Council.
- Progress should continue to be monitored through regular one to one/supervision meetings. The timetable for achievement of the performance management action plan will be set by the manager but will be a minimum of four weeks and a maximum of 12 weeks.
- The possibility that medical/disability related reasons may be affecting the employee's performance will be explored. If this is mentioned as a possibility, the manager should refer this to the Head of Service who in turn will involve the Council's HR consultant. It may be necessary to ask the employee to authorise access to medical records and/or Occupational Health and/or an independent medical consultant in order that full consideration may be given to any reasonable adjustments that may be appropriate.
- Reasonable adjustments will be considered throughout the process where appropriate, including in relation to meetings, correspondence, timescales and support arrangements.

Although this is the informal stage of the procedure, file notes will be made and a copy given to the employee for their record.

Outcomes of the informal stage

If the employee meets the required standard of performance, the manager will inform them of this at a review meeting.

Should significant improvements be evident, but the employee has not yet achieved the required standards of performance, the manager may choose to extend the length of the review period for a further four weeks.

If the desired performance standards have not been met as a result of informal discussion, then the formal stages of this procedure will be commenced.

FORMAL CAPABILITY PROCESS

Action will be taken under the formal process when either:

- Informal action has not resulted in the required level of improvement, or
- The poor performance / capability issue is sufficiently serious for it to be appropriate to progress straight to the formal process.

If the Council feels it is appropriate, the employee may be suspended, on full pay, whilst investigations are carried out. Suspension will only be used where necessary, for a clear reason, and should be kept under review. This does not mean that he or she has been or will be found guilty of any particular offence or allegation of poor performance.

Invite to a formal capability hearing

The employee will be asked to attend a formal capability hearing by their line manager (or another appropriate manager) where they will have the right to be accompanied by a Trade Union representative or work colleague. At least five working days written notice will be given.

The letter should be marked Private and Confidential and include as appropriate:

- Date, time and place of the hearing
- The areas of poor performance which are being considered
- The name(s) of the person/people conducting the hearing
- Copies of all written evidence which will be referred to by management
- Names of any management witnesses who will be attending in person at the hearing
- The employee's right to be accompanied by a Trade Union representative or work colleague
- Reference to the employee's right to call his/her own witnesses, present written submissions and witness statements; this information together with a list of the names of any witnesses must be supplied in writing to the delegated manager at least 2 working days prior to the hearing
- A copy of the Capability policy and procedure and the notification of the actions that may be taken by the panel (if dismissal could be considered this will be specifically stated).
- The requirement that the employee should confirm his/her attendance at least 2 working days prior to the hearing
- Consequences of non-attendance

The suitability of the venue and arrangements for the hearing should ensure equality of access, for example the hearing may need to be held at a specific venue or location that is away from the workplace to ensure confidentiality or if the employee's health makes it difficult for them to attend the normal workplace.

Holding a formal capability hearing

The purpose of this hearing will be to:

- Explain clearly and fairly the ways in which the employee is under-performing, providing examples as appropriate.
- Identify the causes of the poor performance and discuss whether these can be addressed by providing training/support to the employee to achieve the necessary performance improvement. This support may include retraining, further training, coaching, mentoring, closer supervision and support
- Allow the employee to have the opportunity to challenge and/or put forward any facts and evidence for consideration.

The hearing will then be adjourned, and the Chair will take time to consider:

- whether it is appropriate to apply a formal warning, and if so at what level.

- the areas requiring improvement in performance, timescales, and actions to be taken in providing support.

Possible outcomes in the case of a capability issue

The Council may apply a sanction, depending on the circumstances, at any of the following levels:

- First Stage Warning
- Second Stage Warning
- Dismissal

Dismissal may be with or without notice depending on the circumstances and may occur whether or not warnings have been issued.

At the dismissal stage, alternatives to dismissal will be considered, i.e. the offer of an alternative role, demotion or salary reduction. Moving the employee to a different role will only be an option if there is a suitable vacancy.

Transfer (temporary or otherwise and only if available) to an alternative role can be considered at any time during the process if there are risks being presented due to the employee's inability to perform satisfactorily in the role. This would be following a review meeting to advise the employee of this.

Where an employee is being managed under the formal stages of the Capability Policy, this may affect an individual's progression up the incremental pay scale.

Communicating the outcome of a formal capability hearing

After a decision on the outcome is made, it will be communicated to the employee, usually at a face-to-face meeting. In any event, the outcome will be set out in writing. Where this consists of a warning, this will include:

- The level of warning applied and how long it will remain live on their personal file.
- The areas requiring improvement in performance, timescales, the actions to be taken in providing support. This detail will be included in the Performance Management Action Plan (Appendix A). A reasonable time period for achieving the required improvement would normally be between 4-12 weeks. A date for a review meeting at the end of this period should be set at this stage
- A statement that if there is a failure to reach the required standards, further deterioration in performance, or sufficient cause for additional serious concerns during the current review period the manager can initiate the next stage at any time.
- Where a Second Stage Warning has been given, it will be stated that failure by the employee to achieve the required standards within the agreed timescales could ultimately lead to consideration as to whether his or her employment should be terminated.

Notes of the hearing will be taken to support the Chair/panel. A copy of the notes of the hearing will be given to the employee after the hearing. The notes are for information only as a record of the event and should not be taken as full and formal minutes.

Capability review meeting

Following the outcome of a formal capability hearing, and the agreed timescale to review performance, a capability review meeting will be held. The employee can be accompanied by a Trade Union representative or a work colleague at this meeting.

The objective of this meeting will be to review the actions identified previously to support the employee to enable them to improve their performance and consider the next steps, e.g.

- If at the end of the review period the required improvement has been made, this will be confirmed in writing to the employee. However, failure to sustain the desired performance standards during the time the warning is live on file will result in progressing to the next stage of this procedure.
- By exception, if some improvement has been made but the standards have not yet been achieved, the manager may elect to extend the current review period for a maximum period of four working weeks. The employee should be reminded of the potential consequences of failure to achieve a significant and sustained improvement.
- If by the end of the review period the required standards have not been met, the manager can initiate the next stage of the procedure

Additional procedures where dismissal is a possible outcome

Where the formal capability hearing might result in termination of contract, the Hearing Panel will be chaired by a Head of Service, who will be supported by another member of the Senior Management Team previously uninvolved with the capability review procedure. The Council's HR Consultant may also attend the hearing.

Where previous capability hearings have taken place, the Chair should review all the assistance and support that has been offered to the employee to secure improvements in performance, including any suitable alternative employment opportunities.

Witnesses

Witnesses should only be called where relevant. They should only be present to give evidence and to be questioned. Witnesses will be warned that they should keep matters confidential and should not collude with any other witnesses. Details of proposed witnesses should be communicated to either party in advance of the hearing, as indicated above.

Where the manager and/or employee wish to call witnesses it is their responsibility to arrange their release from work so that they can attend. It is the employee's responsibility to obtain the agreement of any witness(es) to speak on his/her behalf and to bring any relevant material.

The Chair (and panel if relevant) and the employee are able to ask questions of either party and any witnesses, as directed by the Chair.

RIGHT OF APPEAL

Employees have the right of appeal against any formal warnings or dismissal notified to them.

Appeals against dismissal shall be to an Elected Member Appeal Panel. Appeals against Written Warnings shall be heard by a Head of Service uninvolved in the hearing or by the Town Clerk and Chief Executive.

The employee must log their appeal, in writing, with the Town Clerk and Chief Executive within fourteen calendar days of the date of the letter informing them of the decision.

Employees shall have the same rights of representation at appeals as for Capability hearings.

Where the appeal is against dismissal, the date of the appeal hearing shall be no later than four weeks after the date of the registration of the appeal. Parties to an appeal will be notified of the hearing date within fourteen calendar days of the registration of the appeal. Statements of Appeal/Case and a list of witnesses to be called must be received from both parties no later than ten calendar days before the hearing. A Case File incorporating such statements will be sent to the parties no later than seven calendar days before the hearing date. However, the time scales in this paragraph may be varied by agreement of both parties.

The Appeals Committee will determine whether to uphold the appeal, reject it, or amend the decision. The decision of the Appeal Committee is final, and the Town Council's Procedure ends here.

Appeals Procedure is as detailed at Section C of the Council's Disciplinary Policy and Procedure.

OTHER FACTORS

Failure to Attend: If an employee fails to attend a hearing due to unforeseeable circumstances, the hearing will be re-arranged. If the employee fails to attend the re-arranged hearing, and there is no acceptable reason given for the non-attendance, the hearing will take place in their absence. However, employees will have the option of requesting that their representative be allowed to present the case in their absence.

Capability Issues and Disability: Consideration must be given as to whether the employee's capability is due to a disability and if this is the case, what reasonable adjustments may be put in place to assist the employee in being able to reach the required standard of performance. Further specialist advice may be sought from Occupational Health and the Council's HR Consultants. If the employee is unable to carry out their role due to health issues, it will probably not be appropriate to go through the formal warnings procedure as described in this policy, and case review meetings may be employed instead, followed if necessary, by a formal hearing before a decision is made as to whether the employee's contract should be terminated on the basis of capability.

Sickness Absence during the Review Period: If an employee goes onto sick leave, dependent on the reason given and the duration, the manager should consider a referral to Occupational Health. If the duration of sickness becomes long term, the employee should be informed that the period of monitoring will be extended to compensate for this.

However, it might in certain circumstances be appropriate to proceed with a formal procedure while an employee is on sick leave, in which case reasonable adjustments will be offered to help the employee provide their input.

Grievance raised against the Chair: If the employee raises a grievance against the manager who is leading on the capability procedure, the capability case may need to be suspended so the allegation can be investigated. Alternatively, the case may be allocated to another manager.

Alternative Work: Where it is agreed by both manager and the employee that suitable alternative employment would be an option to resolve the situation, this would be referred to the Senior Management Team for consideration. If alternative work is available and the employee is appointed to another post, it would be on the pay and conditions of the new post. No entitlement to pay protection applies in cases of redeployment for reasons of underperformance.

Performance Management Action Plan

The following plan has been agreed to support necessary improvements in the performance of the employee named below:

Employee Name:		Job Title:	
Date of Meeting:		Meeting with:	

Performance Issues	Results Achieved at <i>(insert date at which last reviewed performance)</i>	Action required <i>(How will this be achieved)</i>	What support does the employee need to achieve the desired results <i>(What are the barriers to performance and how can these be rectified?)</i>	Expected result	Timescale

A review of your performance based on targets and timescales set will take place on **Date** ... at **Time** ..

If the standards outlined in this action plan are not achieved within the specified timescale, this may lead to action being taken under the formal capability procedure.

I understand the standards and timescales set for the improvement of my performance, as outlined above.

Signed (employee)		Print (employee)	
Signed (manager)		Print (manager)	



Complaints Procedure

1. ROLE OF THE POLICY

This Complaints Procedure applies to complaints about the Town Council and the services it provides. It covers informal and formal complaints, including minor and serious matters.

Separate arrangements as prescribed by law are in place in respect of Councillors. These arrangements are set out further in this policy.

The Town Council believes that complaints can provide useful information and feedback on the quality of our services, procedures and practices. The effective handling of complaints will help us to improve the services provided on behalf of residents, visitors and those working within the Town.

This policy does not apply to complaints from members of staff. These will be considered under the Grievance Procedure.

The aim of this Complaints Procedure is to investigate complaints quickly, fairly and impartially. Wherever possible, the Council will try to resolve matters locally and in a way that is fair to both the complainant and the Town Council.

The Local Government Ombudsman has no jurisdiction over Parish and Town Councils in England. Consequently, there are no statutory mechanisms in place should complaints be made against local councils in England.

2. COMPLAINTS ABOUT COUNCILLORS

All Councillors are required to observe the 'Code of Conduct' which is available on the Town Council's website.

If you believe that a Town Councillor has not followed the Code of Conduct, you can complain to the Monitoring Officer at Central Bedfordshire Council. The Monitoring Officer will consider the complaint under the relevant standards arrangements. You can use the online form at: <https://www.centralbedfordshire.gov.uk/about-your-council/customer-feedback/alternative-complaints-procedures> or write to the Monitoring Officer at Central Bedfordshire Council Offices, Priory House, Monks Walk, Chicksands, Shefford, Bedfordshire, SG17 5TQ.

3. COMPLAINTS ABOUT COUNCIL SERVICES AND STAFF

A complaint is where:

- The Town Council has not done something it has a duty to do or normally does
- The Town Council has done something it has no right to do or does not normally do as a matter of established practice
- The conduct or behaviour of an employee or contractor working for the Town Council is unsatisfactory
- The established levels of service delivery are not reached
- A person does not understand or is not informed of why or how a situation arose or exists
- An adopted and known procedure is not followed
- There may have been maladministration

This Complaints Procedure will not apply to complaints made anonymously.

3.1.WHAT TO DO IF YOU HAVE A COMPLAINT

You can make a complaint by telephone, email, in person or in writing. Please include your name, address, relevant dates and as much information as possible to help the Council look into the matter.

The appropriate details for contacting the Town Council are:

By **telephone** on 01582 513000

By **email** at info@dunstable.gov.uk

Via our **website** at <https://www.dunstable.gov.uk/contact-us/>

In many cases, it will be possible for an issue to be dealt with straight away and the source of the complaint resolved immediately.

For more complex issues, it is much better to put these in writing so that a thorough investigation can be undertaken. Investigations will be dealt with as quickly as possible. You will receive a written acknowledgement of your complaint within five working days and a full response to your complaint will be provided according to the timetable below.

The Town Council maintains a register of complaints showing dates, details of the complaint, complainant and the action taken to resolve the issue. This is available for all members of the Town Council to inspect. Serious complaints will be reported to appropriate Councillors.

3.2.PROCEDURE FOR DEALING WITH COMPLAINTS

If it has not been possible to deal with your complaint informally, the following section lays out the procedure and timelines under which your complaint will be dealt with.

Stage 1 – Formal Complaint

Task	Timescale	Actions
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Date Adopted: March 2023
Last Reviewed: June 2024

Complaint is received	Day 1	
Acknowledgement	By Day 4 - Within three working days of receipt of the complaint	The administration team will acknowledge receipt of the complaint to the complainant and will notify them of the name of the officer handling their complaint and the target date for a response.
Response due	By Day 28	The responding officer will provide a full response to the complainant outlining the right to appeal if they are not satisfied with the outcome.
Request for extension	By Day 28	The responding officer will inform the complainant that the complaint cannot be resolved within the 28 day timeframe and give the reasons why along with an estimate of how long the complaint will take to respond to.
Appeal	Within 14 days of the receipt of the Stage 1 response	If the complainant is dissatisfied with the response at Stage 1 of the Complaints Procedure they have a right to appeal this at Stage 2. This is their only and final stage of appeal.

Stage 2 – Appeal

If the complainant is dissatisfied with the response at Stage 1 of the Complaints Procedure they have a right to appeal this at Stage 2. This is their only and final stage of appeal.

Task	Timescale	Actions
Appeal is made in writing	Day 1	All appeals should be sent for the attention of the Town Clerk & Chief Executive. If the Town Clerk & Chief Executive dealt with the complaint at Stage 1 they will refer the issue to another senior officer or the Town Council's Appeals and Appointments Committee as appropriate.
Acknowledgement	By Day 4 - Within three working days of receipt of the complaint	The Town Clerk & Chief Executive (or nominated senior officer) will acknowledge receipt of the appeal to the complainant and will notify them of the target date for a response.
Response due	As soon as possible but no later than eight weeks	The Town Clerk & Chief Executive (or nominated senior officer) will provide a full response to the complainant.

Request for extension	As soon as possible but no later than eight weeks	The Town Clerk & Chief Executive (or nominated senior officer) will inform the complainant that the complaint cannot be resolved within the 28 day timeframe and give the reasons why along with an estimate of how long the complaint will take to respond to.
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The purpose of a Stage 2 Appeal is to consider if:

- The customer's complaint has been fully understood and addressed at Stage 1.
- All the relevant evidence has been taken into account.
- The Town Council's policies and procedures have been properly followed.
- The Complaints Procedure was carried out properly and fairly.
- The conclusions reached on the basis of evidence are reasonable and fair.
- Any other actions or remedies are appropriate.

It is not to:

- Review Town Council policy.
- Deal with any new matters not part of the original complaint.
- Cover any points dealt with by a court or where an appeal against a decision lies with a court or other legal process.

Complaints about issues that occurred more than three months ago will not normally be considered unless there are exceptional circumstances. Similarly there will be no review of a complaint that was dealt with more than three months ago.

The Council may take a different approach where a complaint is repeated, unreasonable or vexatious. Any decision to limit contact will be made carefully, will be proportionate, and will be explained to the complainant in writing. See Dunstable Town Council's Vexatious Complaints Policy.

4. FINANCIAL IRREGULARITY

Complaints about financial irregularity should be referred to the Council's auditor, whose name and address can be obtained from the Responsible Financial Officer (RFO).

5. CRIMINAL ACTIVITY

Any complaints which involve criminal activity will be referred to the Police.

6. COMPLAINTS ABOUT THE TOWN CLERK & CHIEF EXECUTIVE

If the complaint is about the Town Clerk & Chief Executive the complaint will be reviewed by the Town Council's Appeals and Appointments Committee. This committee is made up of a group of Councillors who would not have been involved with the issue previously.

The Committee will be convened as soon as possible but no later than eight weeks from the receipt of the complaint. Once the meeting has taken place they will respond to the complainant within 10 working days.

The Committee's decision is final.