Kingsley Parish Council
The Boardroom
Kingsley Cemetery
Hollow Lane
Kingsley
Cheshire
WA6 8EF
www.kingsleyparishcouncil.org.uk
parish.clerk@kingsleyparishcouncil.org.uk

12 November 2026

To: **Members of Kingsley Parish Council**

Dear Councillor,

Dated this twelfth day of November 2026, you are hereby summoned to attend an Ordinary Meeting of Kingsley Parish Council to be held at 19:00 on the seventeenth day of November 2026 in Kingsley Community Centre, 34 Smithy Lane, Kingsley, Frodsham, WA6 8ED.

Mr Luke Trevaskis
Proper Officer

Note to Councillors:

If you are unable to attend the meeting, please notify the Proper Officer of your apologies.

Note to Public:

Members of the public who are registered local government electors and/or business-rate payers may make representations, answer questions and give evidence at a meeting which they are entitled to attend strictly in respect of the business on the agenda, provided that their primary residence (or business) is within the administrative boundary of Kingsley Parish Council. Qualifying members of the public who would like to make representations at a meeting must contact the Proper Officer no later than 48 hours prior to the meeting to advise both of their wish to speak and the full content (providing a transcript if available). Other issues could be raised if written notice of the question/matter is submitted to the Proper Officer ten working days prior to the meeting and the matter is considered appropriate for the agenda. A request to speak does not confer an automatic right to do so. All requests will be reviewed by officers, in consultation with the Chairperson of the Council or Committee, prior to the meeting. This is to safeguard the integrity of Council proceedings, prevent procedural misconduct, and mitigate legal and financial risks. Comments that could lead to undue disruption, expose the Council to legal challenge, or impact the wellbeing of staff - potentially resulting in avoidable costs to the public purse - will not be permitted. This approach ensures that public participation remains constructive while protecting the responsible use of public funds and resources. For the avoidance of doubt, and to ensure a constructive and orderly meeting, and in accordance with established protocols, public participation must not be used to:

- Make personal or defamatory remarks about individual councillors. While the public may raise concerns about council decisions or policies, personal attacks or allegations regarding the conduct of councillors are not appropriate for public discussion. Complaints regarding breaches of the Councillors' Code of Conduct should be referred to the Monitoring Officer, who is responsible for investigating such matters.
- Discuss individual staff members, their performance, or any matters which may relate to them personally (HR or otherwise). Employment issues, including complaints about staff, are confidential and should be addressed through the appropriate procedures. Any concerns about staff conduct must be submitted in writing to the Proper Officer. If the concern relates to the Proper Officer, it should be directed in writing to the Chairperson of the Council and/or the Personnel Committee. However, members of the public may raise general concerns about service delivery, provided that any comments do not target specific individuals or relate to individual roles.

AGENDA

1. **Apologies** - to receive apologies for absence.

2. **Declarations** - to note declarations of members' interests.

3. **Minutes** - to receive and confirm the minutes of the last meeting.

4. **Public Participation** - to receive representations from members of the public for a period of time not exceeding fifteen minutes, noting each member of the public is permitted to speak for no longer than three minutes regarding an item on the agenda, provided that their representations have previously been submitted to the Proper Officer no less than 48 hours prior to the meeting.

5. **Planning** - to consider the planning applications and agree actions.

6. **Highways** - to consider the updates regarding highways and agree actions.

7. **Ward Councillor Report** - to note any updates or reports.

8. **Office Arrangements**

i) Background

To note that a member of the Council has raised questions regarding the agreed home-working arrangements of the Council's employee.

This agenda item is intended to ensure that the Council has undertaken appropriate due diligence, that any questions are considered through the proper governance arrangements, and that a clear determination is reached as to whether the matter warrants further investigation or should be formally concluded.

The Council must ensure that any consideration of alternative working arrangements is undertaken in accordance with its statutory duties as an employer, contractual obligations, health and safety responsibilities, and financial responsibilities as a public authority.

ii) Current Arrangements

The Council currently has one building within its jurisdiction - the Cemetery Boardroom on Hollow Lane.

The Boardroom's current permitted planning use relates to cemetery activities and any use for unrelated administrative business has not been established as lawful under the relevant planning permission.

Any change in use would therefore require planning permission, additional ongoing obligations such as increased insurance costs, and the additional payments of business rates for office use (for which the building is currently exempt due to its limited permitted use as a cemetery records repository).

Given the cost implications, and absence of alternative dedicated office accommodation, the Council has previously permitted all of its approx 8 employees to undertake their duties from home for more than ten years.

Employees remain required to attend Council and committee meetings, for which the Council arranges the hire of the Community Centre.

No contributions towards home-office accommodation, domestic utility bills or other household running costs have been paid to the current employee since the commencement of their employment.

The present arrangements have therefore avoided the need for the Council to establish, maintain and fund a dedicated administrative workplace.

iii) 3. Statutory Duties and Compliance Implications

Before considering any proposal to require an employee to undertake their duties from the Cemetery Boardroom, the Council will need to establish the legal and practical feasibility of doing so, and cost implications

The Health and Safety at Work etc. Act 1974, particularly sections 2 and 3, requires employers to ensure, so far as is reasonably practicable, the health, safety and welfare of employees and others affected by their undertaking. This duty is supplemented by numerous regulations, including those relating to risk assessments, toilet/break facilities, workplace conditions, electrical safety, fire precautions, lone working, reasonable adjustments and contractual employment rights.

The following schedule identifies the principal statutory/regulatory matters that would require assessment and, where appropriate, additional expenditure, professional advice, operational arrangements and continuing compliance. This list is not exhaustive, and costs are indicative estimates. It should be noted that after this initial scope of work, additional work may be required subject to outcomes of reports or further investigations undertaken by professionals.

Activity	Description	Cost Estimate for Scoping / Advice (Not Implementation of Outcomes of Advice)
Planning and Building Controls		
Planning expert advice – existing lawful building use	Engage planning expert to provide initial advice on steps required to obtain planning permission for the use of the cemetery boardroom as a permanent office to be used for general council business.	£400.00
Planning expert advice – potential building upgrades	Engage planning expert to provide advice on any changes required to the building to facilitate such permitted use.	£350.00
Planning expert – feasibility of change-of-use application and supporting documentation	Engage planning expert to prepare planning application for change of use, noting that new drawings may need to be prepared by an architect to show size of space, access information, parking considerations, highways impacts, or other supporting documentation - for example, any anticipated increased light pollution, or any impacts on wildlife and bats which roost adjacent to the boardroom, or considerations regarding impacts to heritage, or the wider conservation area.	£400.00
Building Regulations specialist and energy efficiency assessment	Engage specialists to assess requirements of building regulations - including fire safety, ventilation, electrical work, sanitation, energy efficiency certification (minimum rating of E required including consideration of insulation, airtightness etc).	£500.00
Conveyancing solicitor – review of title and restrictions	In addition to building regs, the Council would also need to engage a conveyancing solicitor to review the building's title, restrictions on permitted use, or other legal limitations relevant to the building's use.	£450.00
Business rating valuation – initial VOA enquiries	The Council would need to seek confirmation from the Valuation Office Agency as to whether the proposed office use would affect the rateable assessment of the property or any current exemption or relief, and obtain an indicative annual business rates liability	£Unknown
Health and Safety Responsibilities		

Workplace risk assessment, including lone working, access and security	Undertake a suitable and sufficient workplace risk assessment covering the intended use of the Boardroom as an employee's regular office. Assess risks arising from the building's condition, configuration, location, surrounding environment, access and security including mitigations for hazards associated with lone working. Evaluate the availability of emergency assistance and the likely effectiveness of arrangements for summoning help. Consider whether the employee could safely enter, occupy and leave the building alone, including during winter months or periods of poor visibility or ice/snow underfoot and whether additional mitigations such as improve outdoor lighting is required. Assess whether a personal alarm, monitored alarm system, emergency telephone or equivalent provision is reasonably necessary. Assess the risk of violence, threatening behaviour or harassment by members of the public, contractors, cemetery visitors or other third parties.	£450.00
Assessment of preventive and protective measures required	Implement the preventive and protective measures required by the risk assessment.	£150.00
Employee safety and individual workplace suitability assessment	Consider the suitability of the premises for employees who may have relevant health conditions or other individual needs, without making assumptions about those circumstances. Assess the potential for accidents or sudden illness where no other employee is immediately available to provide assistance.	£150.00
Review of accident, incident and RIDDOR reporting arrangements	Introduce suitable arrangements for reporting hazards, accidents, incidents and near misses, including statutory reporting under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 where applicable.	£75.00
Church toilet facilities, welfare provision and water safety assessment	Confirm that the church is willing to provide continued access to its toilet facilities for regular workplace use. Establish whether a formal written agreement, licence or other arrangement is necessary to secure reliable access. Confirm the facilities are available whenever the employee is required to work, including when the church is closed, occupied for services or otherwise unavailable. Confirm that washing facilities provide hot and cold running water. Ensure that suitable soap or other washing agents are provided. Ensure that hygienic hand-drying facilities, such as paper towels or hand-dryers, are available at all times. Confirm that welfare facilities have adequate lighting, ventilation, privacy and suitable means of securing doors. Confirm whether the church would require financial contributions towards increased water use, electricity, heating, cleaning, consumables or general maintenance. Ensure that drinking water is readily accessible, with water testing undertaken to assess and control risks from legionella bacteria.	£300.00
Rest facilities and workplace welfare assessment	Ensure that suitable facilities exist for rest breaks and eating meals, with any additional provision for storing or preparing food determined by workplace requirements.	£75.00

Heating, insulation and workplace temperature assessment	Establish whether the building is adequately insulated and suitable for regular occupation throughout the year. Assess whether an appropriate working temperature can be maintained during the full period of occupation. HSE guidance indicates that workrooms should normally be at least 16°C for sedentary office work. This is currently guidance, and statutory provisions are currently being considered by the Government.	£250.00
Damp, mould, condensation and ventilation assessment	Assess any risks arising from condensation, damp, mould or inadequate air circulation.	£250.00
Cleaning, maintenance and winter-access assessment	Establish suitable arrangements for cleaning and maintenance, including any requirements for gritting of pathways during adverse weather.	Officer Time
Fire Safety		
Identification of responsible person and allocation of duties	Identify person responsible for fire safety.	Officer Time
Fire risk assessment, including detection and warning systems	Assess whether additional smoke detection, fire alarm equipment or warning systems are required, and the regular checks required.	£350.00
Emergency escape routes, signage and lighting assessment	Ensure escape routes are clearly marked and assess if emergency lighting is required to be installed.	Included above.
Fire door and escape hardware assessment	Assess whether the existing door, including its fire resistance, opening arrangements, escape hardware and any self-closing devices, satisfy the requirements identified by the fire assessment and any applicable building-control requirements.	Included above.
Fire extinguisher and servicing requirements assessment	Determine the appropriate provision and location of firefighting equipment, including extinguishers where required by the assessment. Establish suitable inspection, servicing, maintenance and testing arrangements for any fire safety equipment.	Included above.
Fire evacuation planning and training requirements	Develop and document an appropriate fire emergency plan, including procedures for a lone employee, and any training required.	£100.00
Electrical Safety		
Electrical installation condition report (EICR)	Obtain an assessment of the suitability and condition of the existing electrical installation for regular office occupation. Undertake any remedial electrical works identified as necessary.	£250.00

Portable appliance safety assessment / PAT testing	PAT testing - establish appropriate inspection and maintenance arrangements for portable electrical equipment, including portable appliance testing where warranted by the risk assessment.	£75.00
Employment Law		
HR review of employment contract and flexible working provisions	Obtain professional HR advice on employment contracts, review provisions relating to place or work, and existing flexible working arrangements.	£300.00
HR/legal advice on established home working and contractual variation	Obtain an assessment from a HR professional whether the established home-working arrangements, which have operated within the Council for more than ten years, have any contractual significance through express agreement. Establish whether a requirement to attend the Cemetery Boardroom regularly would amount to a contractual change or could lawfully be introduced under existing contractual provisions. Consider whether genuine consultation and agreement would be required before any change could be implemented. Consider the legal consequences of imposing a change without agreement, including potential allegations of breach of contract, discrimination or constructive dismissal.	£500.00
Assessment of potential additional employment costs, including mileage	Assess whether a proposed workplace change would create additional contractual obligations such (eg increases to mileage costs).	Officer Time
Reasonable adjustments and workplace suitability review	Establish, through an appropriately confidential process, whether any reasonable adjustments currently form part of the employee's working arrangements.	£150.00
Harassment and third-party safety risk assessment	Undertake a specific assessment of foreseeable harassment risks associated with regular occupation of the premises. Consider the possibility of unwanted or inappropriate conduct by members of the public, cemetery visitors, contractors, service users or other persons encountered through the employee's work. Assess whether the location, absence of immediate assistance and nature of public access create additional risks requiring preventive action. Consider whether additional security measures, access controls, emergency communication arrangements or restrictions on unsupervised public interactions are reasonably necessary.	£200.00
Insurance		
	Notify insurer about a change of use in building. Obtain quotations for any increased insurance premiums or additional cover required by the changes in insured activities.	Officer Time
Internet and Connectivity		
Broadband feasibility and installation quotation	Establish secure, reliable internet connectivity.	Officer Time

Telephone coverage and confidential communications assessment	Assess the adequacy of telephone coverage and ensure that confidential meetings, telephone calls and sensitive matters can be conducted without inappropriate disclosure, or, for example, a conversation being overheard at times when the window or door may be open for ventilation purposes.	Officer Time
Furniture, Equipment and Storage		
DSE, furniture and storage needs assessment	Ensure appropriate furniture, equipment, and storage exists.	Officer Time
Security and intruder alarm requirements assessment	Assess whether additional security measures (such as an alarm) are appropriate if additional council equipment is to be stored in the cemetery.	Officer Time
Workplace Conduct and First Aid		
Workplace conduct protocol scoping	Establish a workplace conduct protocol to notify employee of welfare arrangements such as toilet facilities, emergency procedures, lawful smoking-compliant guidance, and on site management of visitors etc.	£150.00
First-aid needs assessment	Ensure stocked, in date, first aid kit is available, and periodic checks are undertaken.	Officer Time
Costs		
Financial feasibility, ongoing liabilities and budget review	Ensure any costs arising from the above investigations is within budget and the Council adequately considers any ongoing annual liabilities such as additional costs for insurance, business rates, utilities, internet provision, future remedial works, safety inspections and additional staff resource to undertake work associated with the ongoing management of a commercial office.	Officer Time
Sub Total		£5875.00
Contingency	Contingency (10% of all above costs, excluding officer time)	£588.00
Total		£6463.00

It should be emphasised that the above estimates relate solely to initial scoping and feasibility assessments and do not include the costs of implementing any recommendations arising from those investigations. Any subsequent works would require separate quotations and budget approval. By way of illustration, a planning application with supporting drawings and documentation could cost £2,000-£4,000, emergency lighting installation £300-£800, external security lighting £300-£1,000, and fire or intruder alarm systems £500-£1,500 each. These are indicative lower-end allowances only, and more extensive building alterations, regulatory requirements or specialist works could result in significantly higher expenditure.

It should also be noted that the initial scoping exercise is estimated to require approximately 60-100 hours of officer time to coordinate professional advice, arrange assessments and inspections, liaise with relevant parties, review findings and prepare reports for the Council. Given existing operational commitments and capacity constraints, it may be necessary to engage temporary locum support to facilitate this work without adversely affecting the delivery of the Council's existing services. It is therefore recommended that the Council makes provision for an additional budget of £2,500, based on 100 hours at £25 per hour, to enable the procurement of locum support should existing officer capacity prove insufficient.

iv) Indicative Annual Costs:

The following estimates represent potential additional annual costs associated with operating the Cemetery Boardroom as a permanent administrative workplace. They are indicative budget allowances that may need to be considered in the new FY2728 budget, subject to the findings of the initial scoping exercise.

Item	Estimated Annual Cost
Business rates, subject to valuation	£1,500.00
Broadband	£540.00
Contribution to Church / Consumables	£250.00
Cleaning Services	£300.00
Insurance	£250.00
Utilities (up to an additional 750 hours of office use pa)	£1,000.00
Fire alarm inspection, servicing and maintenance.	£150.00
Emergency lighting inspection and testing	£150.00
Fire extinguisher servicing	£50.00
Portable appliance inspection/PAT testing allowance	£50.00
Electrical installation testing (annualised allowance)	£50.00
Heating system inspection and servicing	£150.00
Building maintenance and minor repairs	£500.00
Winter gritting, access safety and external maintenance	£250.00
First-aid supplies and periodic training provision	£100.00
Health and safety professional advice and periodic assessment reviews	£200.00
Office equipment and furniture replacement provision	£50.00
Sub-Total	£5540.00
Contingency	£554.00
Total	£6094.00

v) 6. Recommendations to Consider:

Option A - Conclude the Current Arrangements (Home Working) as Fit for Purpose

Having considered the existing arrangements, the absence of dedicated alternative office accommodation and the legal and financial implications of establishing a regular workplace, the Council resolves that no further investigation is presently warranted and the Council re-affirms that its current home working arrangements are fit for purpose.

Option B - Commission Further Investigation

The Council resolves that, before any decision is considered concerning a change to the council's regular place of work, a comprehensive feasibility report shall be commissioned.

This report shall address the statutory requirements, building suitability, employment considerations, health and safety duties, reasonable adjustments and full initial and recurring costs identified in this report, within the total budgeted costs identified above (£6,463.00 professional services +£2,500.00 locum costs).

Any further expenditure arising from the feasibility report shall be subject to prior approval through the Council's established financial procedures.

9. Cemetery Complaint -

To note that a formal complaint concerning the Council's management of cemetery matters was considered by the Staffing Committee at its meeting held on 3 November 2026, the outcome of which is detail below.

The complaint alleged:

- Failure to respond to correspondence.
- Procedural obstruction and misuse of legal frameworks.
- Breaches of applicable codes and statutory duties.
- Unreasonable obstruction of a requested transfer of cemetery burial rights.

The Committee reviewed the complaint alongside the relevant correspondence and supporting documentation and reached the following conclusions:

9.1 Failure to Respond to Correspondence

The Committee established that correspondence had been responded to, although it acknowledged that competing service demands had contributed to delays on some occasions. The Committee found no evidence of a systematic failure or refusal to respond and did not uphold this element of the complaint.

9.2 Transfer of Exclusive Rights of Burial

The Committee noted that extensive correspondence had taken place over several years involving multiple members of the same family.

The Council had issued the necessary transfer documentation to family members on several occasions to facilitate the transfer of the burial rights. However, despite repeated opportunities, none of the completed documentation had been returned to the Council.

The Committee further noted that the complainant was not the registered holder of the Exclusive Right of Burial. Consequently, the Council was required to respect the rights of the registered holder and its obligations concerning the confidentiality and lawful disclosure of personal information.

The Committee confirmed that a further set of transfer documentation had been issued directly to the registered deed holder in September 2026. At the date of the Committee meeting, approximately six weeks later, the registered holder had not returned the documentation or authorised the requested transfer to the complainant.

The Committee concluded that the Council had taken reasonable and appropriate steps to facilitate the transfer and that any outstanding action rested with the relevant family members. The Council could not lawfully or reasonably be expected to complete a transfer without the necessary authority and supporting documentation.

9.3 Allegations of Procedural Obstruction and Statutory Breaches

Having reviewed the available evidence, the Committee found no substantiation for allegations of procedural obstruction, misuse of legal frameworks, or breaches of applicable codes or statutory duties.

The Committee noted that professional guidance had been sought from the Institute of Cemetery and Crematorium Management (ICCM) throughout the process and was satisfied that the Council's procedures and actions were appropriate.

9.4 Conduct and Accuracy of Correspondence

The Committee expressed concern regarding the tone and content of certain correspondence received from the complainant, including allegations that Council officers had been dishonest or had failed to issue correspondence.

Upon examination of the documentary evidence, the Committee established that emails alleged not to have been sent had, in fact, been issued. Furthermore, copies of those same emails had subsequently been forwarded by the complainant within their own correspondence.

The Committee considered that the allegations concerning officer dishonesty were not supported by the evidence and that such allegations should not be made without a reasonable evidential basis.

The Committee reaffirmed the Council's responsibility to protect employees from unreasonable or inappropriate conduct while ensuring that legitimate complaints are considered fairly and objectively.

9.5 Committee's Determination

Having considered the complaint in full, the Committee unanimously resolved that:

- The complaint was not upheld, as the allegations were not substantiated by the documentary evidence.
- The Council had taken reasonable steps to facilitate the transfer of burial rights and had fulfilled its responsibilities insofar as the information and authority available permitted.
- Responsibility for progressing the outstanding transfer now rested with the relevant family members, including the registered holder of the Exclusive Right of Burial.
- No further investigation or action was warranted in respect of the matters already examined, unless material new evidence or a separate legal obligation arose.

The Committee was satisfied that the Council had acted reasonably, proportionately and in accordance with its responsibilities.

The Committee concluded that the complaint was not upheld, that no adverse finding against the officer was warranted, and that no further action was required in respect of the officer's professional conduct arising from the matters considered. The Council is asked to receive and note the Committee's findings.

10. Officer Recruitment, Qualifications, and Published Biography -

To receive and note the findings of the Staffing Committee following its consideration of a complaint concerning an officer's recruitment, professional qualifications and published biography.

The Council received a complaint questioning the accuracy of information contained within an officer's biography on the Council's website, together with representations concerning the officer's professional qualifications and the circumstances surrounding their original appointment.

The Staffing Committee considered these matters at its meeting held on 3 November 2026, undertaking a retrospective review of the relevant recruitment history, contemporaneous correspondence, contractual arrangements, professional qualifications and website records.

The Committee considered the matters individually and collectively, distinguishing between assertions made by the complainant, information capable of independent verification, and the requirements actually applicable to the officer's employment.

The Committee's findings are summarised below.

10.1. Historical Recruitment and Appointment

The Committee established the following chronology:

- **November 2020:** the Council engaged the services of a locum officer following a period of considerable administrative instability. In the preceding seven years, the Council had engaged seven different Parish Clerks, as evidenced by its historical records and minutes.
- The locum officer was recommended to the Council by Jackie Weaver, Chief Officer of the Cheshire Association of Local Councils (ChALC), an external professional organisation providing advice and support to parish and town councils.
- **November-December 2020:** the Council advertised the permanent vacancy through an open recruitment process. One application was received, which the Council assessed as not meeting its requirements.
- Following an extension of the application deadline, no further applications were received.
- In those circumstances, the Council approached the serving locum officer to establish whether they would consider accepting the position on a permanent basis.
- The officer subsequently accepted the appointment on the terms offered by the Council.

The Committee noted that the appointment arose from a recruitment exercise initiated and controlled by the Council, following an unsuccessful attempt to attract a suitable candidate through open advertisement.

The terms of the appointment, including the required working hours, were determined by the Council with reference to its operational requirements.

The salary was established by reference to nationally recognised local government salary benchmarks, with the responsibilities of the position independently assessed by Jackie Weaver in her professional capacity as Chief Officer of ChALC.

The Committee found no evidence that the officer was offered more favourable terms than those made available to prospective applicants through the advertised recruitment process.

The Committee therefore found no evidential basis for suggesting that the appointment resulted from an improper recruitment arrangement.

It further noted the distinction between a recruitment process which did not produce a suitable external applicant and an appointment made without any recruitment process. The available records establish that the former occurred.

10.2. Qualifications and Eligibility for Appointment

The Committee examined the qualifications and experience required at the time of recruitment in the recruitment documentation.

The original vacancy advertisement, prepared with the assistance of the Chief Officer of ChALC, did not prescribe the Certificate in Local Council Administration (CiLCA), or any other named professional qualification, as an essential requirement of appointment.

The Council were, however, looking for relevant experience within parish council administration.

The Committee confirmed that the officer's relevant employment experience was considered at the time of appointment, including their existing employment within both parish and town council settings.

The Committee found no evidence that the officer failed to satisfy a qualification requirement imposed by the Council at the time of recruitment, because no such professional qualification requirement had been stipulated.

Equally, the Committee noted that the subsequent verification of a professional qualification does not retrospectively alter the terms upon which an appointment was originally made.

The relevant question is whether the officer met the requirements actually established by the Council at the material time, rather than requirements which a complainant may subsequently consider ought to have applied.

The Committee was satisfied that there was no evidence of a material misrepresentation by the officer in securing their appointment.

10.3. Allegation Concerning the Website Biography

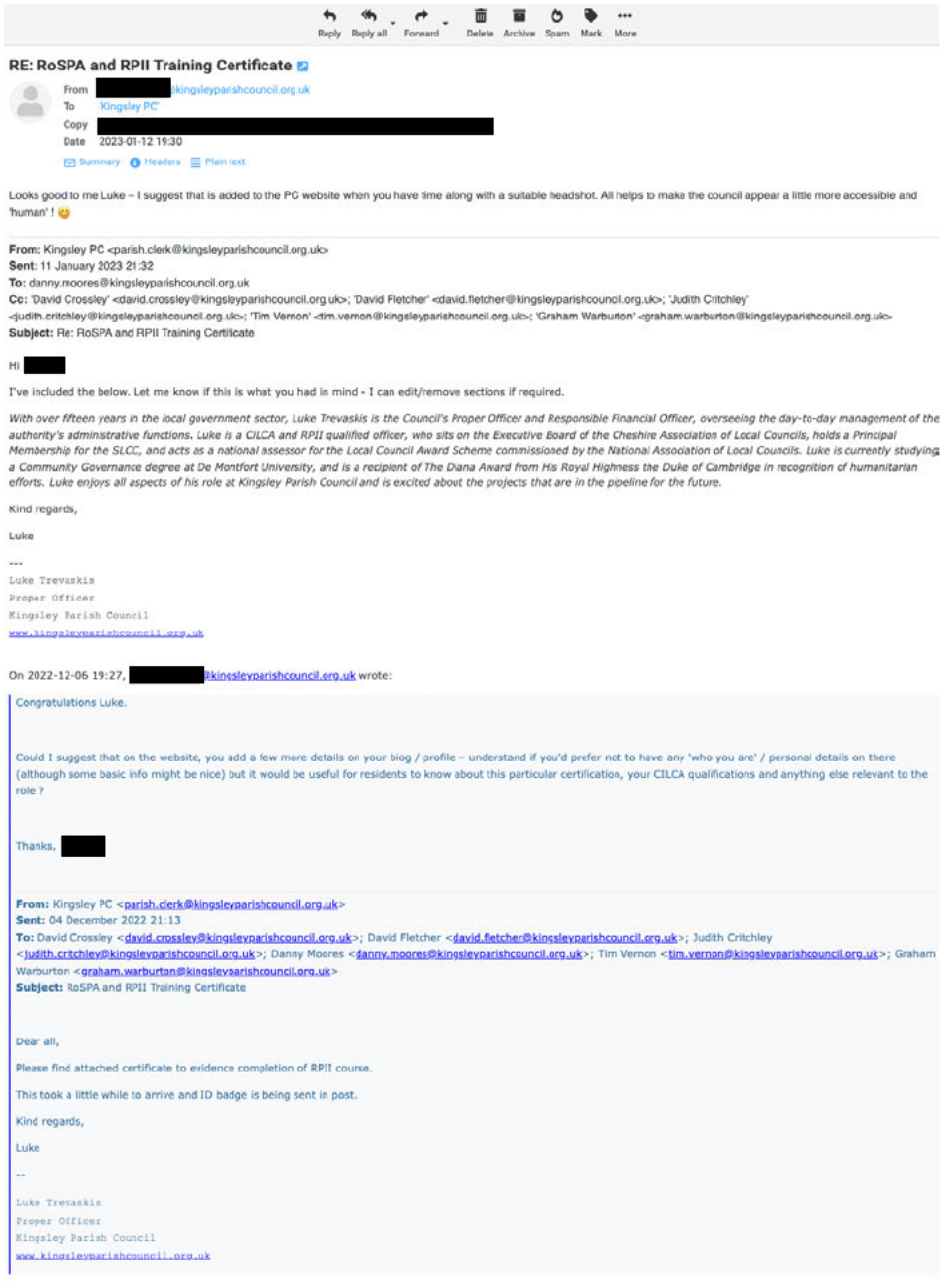
A central element of the complaint concerned the allegation that the officer had authored or published their professional biography on the Council's website in June 2020.

The Committee examined this allegation against the available contemporaneous records.

The evidence established that:

- The officer did not commence employment with the Council until November 2020.
- The officer had no identified involvement in the Council's administration, website management or employment arrangements during June 2020.
- The biography was prepared following a request from a councillor in December 2022, with the relevant email correspondence dating from 4 December 2022 to 12 January 2023.
- The biography was subsequently uploaded to the Council's website on or around 11 January 2023.
- The complainant's assertion concerning June 2020 relied upon a date displayed against the relevant website page.
- The Council sought clarification directly from its website provider, which confirmed that the displayed date related to the original creation of the webpage, rather than the subsequent addition or amendment of the officer's biography.

Councillor correspondence with employee dated 4.12.22-12.1.23:



Reply Reply all Forward Delete Archive Spam Mark More

RE: RoSPA and RPII Training Certificate

From [redacted]@kingsleyparishcouncil.org.uk
To 'Kingsley PC'
Copy [redacted]
Date 2023-01-12 19:30

Summary Headers Plain text

Looks good to me Luke – I suggest that is added to the PC website when you have time along with a suitable headshot. All helps to make the council appear a little more accessible and 'human' !

From: Kingsley PC <parish.clerk@kingsleyparishcouncil.org.uk>
Sent: 11 January 2023 21:32
To: danny.moores@kingsleyparishcouncil.org.uk
Cc: 'David Crossley' <david.crossley@kingsleyparishcouncil.org.uk>; 'David Fletcher' <david.fletcher@kingsleyparishcouncil.org.uk>; 'Judith Critchley' <judith.critchley@kingsleyparishcouncil.org.uk>; 'Tim Vernon' <tim.vernon@kingsleyparishcouncil.org.uk>; 'Graham Warburton' <graham.warburton@kingsleyparishcouncil.org.uk>
Subject: Re: RoSPA and RPII Training Certificate

Hi [redacted]

I've included the below. Let me know if this is what you had in mind - I can edit/remove sections if required.

With over fifteen years in the local government sector, Luke Trevaskis is the Council's Proper Officer and Responsible Financial Officer, overseeing the day-to-day management of the authority's administrative functions. Luke is a CILCA and RPII qualified officer, who sits on the Executive Board of the Cheshire Association of Local Councils, holds a Principal Membership for the SLCC, and acts as a national assessor for the Local Council Award Scheme commissioned by the National Association of Local Councils. Luke is currently studying a Community Governance degree at De Montfort University, and is a recipient of The Diana Award from His Royal Highness the Duke of Cambridge in recognition of humanitarian efforts. Luke enjoys all aspects of his role at Kingsley Parish Council and is excited about the projects that are in the pipeline for the future.

Kind regards,

Luke

Luke Trevaskis
Proper Officer
Kingsley Parish Council
www.kingsleyparishcouncil.org.uk

On 2022-12-06 19:27, [redacted]@kingsleyparishcouncil.org.uk wrote:

Congratulations Luke.

Could I suggest that on the website, you add a few more details on your blog / profile – understand if you'd prefer not to have any 'who you are' / personal details on there (although some basic info might be nice) but it would be useful for residents to know about this particular certification, your CILCA qualifications and anything else relevant to the role ?

Thanks, [redacted]

From: Kingsley PC <parish.clerk@kingsleyparishcouncil.org.uk>
Sent: 04 December 2022 21:13
To: David Crossley <david.crossley@kingsleyparishcouncil.org.uk>; David Fletcher <david.fletcher@kingsleyparishcouncil.org.uk>; Judith Critchley <judith.critchley@kingsleyparishcouncil.org.uk>; Danny Moores <danny.moores@kingsleyparishcouncil.org.uk>; Tim Vernon <tim.vernon@kingsleyparishcouncil.org.uk>; Graham Warburton <graham.warburton@kingsleyparishcouncil.org.uk>
Subject: RoSPA and RPII Training Certificate

Dear all,

Please find attached certificate to evidence completion of RPII course.

This took a little while to arrive and ID badge is being sent in post.

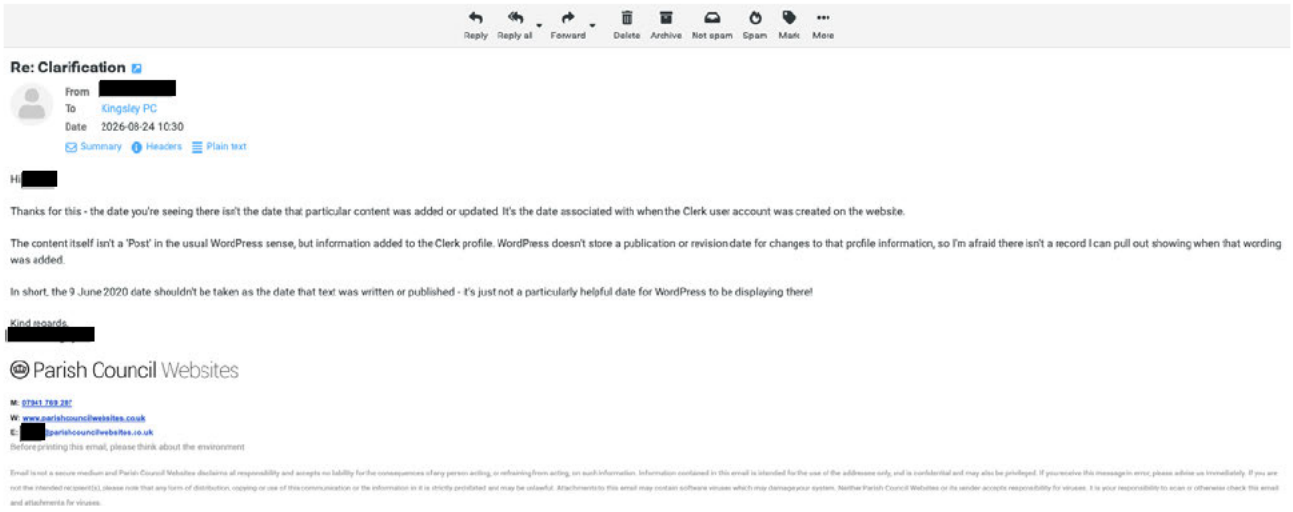
Kind regards,

Luke

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Luke Trevaskis
Proper Officer
Kingsley Parish Council
www.kingsleyparishcouncil.org.uk

Technical evidence from website provider regarding June 2020 timestamp:



Reply Reply all Forward Delete Archive Not spam Spam Mark More

Re: Clarification

From [redacted]
To Kingsley PC
Date 2026-08-24 10:30

Summary Headers Plain text

Hi [redacted]

Thanks for this - the date you're seeing there isn't the date that particular content was added or updated. It's the date associated with when the Clerk user account was created on the website.

The content itself isn't a 'Post' in the usual WordPress sense, but information added to the Clerk profile. WordPress doesn't store a publication or revision date for changes to that profile information, so I'm afraid there isn't a record I can pull out showing when that wording was added.

In short, the 9 June 2020 date shouldn't be taken as the date that text was written or published - it's just not a particularly helpful date for WordPress to be displaying there!

Kind regards,

[redacted]

Parish Council Websites

M: 07941 789 287
W: www.parishcouncilwebsites.co.uk
E: [redacted]@parishcouncilwebsites.co.uk
Before printing this email, please think about the environment

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The Committee placed particular weight upon the independent technical clarification provided by the website supplier, together with the contemporaneous email correspondence demonstrating when the biography was requested and prepared.

The Committee noted that the complainant had apparently interpreted the webpage's original creation date as evidence of the date on which the officer's biography had been written.

That interpretation is not supported by the technical evidence.

Indeed, the available records demonstrate that the officer's biography was prepared approximately two years after their initial appointment, and that the webpage itself predated their employment.

The Committee considered this to be a material distinction which substantially undermined the factual premise upon which this element of the complaint had been advanced.

A date displayed against a webpage cannot, without further corroboration, reasonably be treated as conclusive evidence of the authorship, provenance or publication date of all content subsequently appearing upon that page.

The Committee therefore concluded that the allegation that the officer authored or published the biography in June 2020 was factually incorrect and was not upheld.

The conclusion was based upon documentary and independent technical evidence, rather than assumptions concerning the officer's conduct or intentions.

10.4. Verification of Professional Qualifications

Notwithstanding its findings concerning the original recruitment process and the chronology of the website biography, the Committee considered it appropriate to address separately the questions raised about the officer's professional qualifications.

Members therefore undertook a direct examination of the relevant CiLCA documentation.

All three members of the Committee personally inspected:

- The officer's Certificate in Local Council Administration.
- The recorded assessment outcomes and points awarded across the relevant modules.
- The dates associated with the qualification and assessment process.

The Committee was satisfied, following examination of the documentation, that the officer held the qualification evidenced by the records presented.

This was not a determination made solely in reliance upon representations by the officer. Members examined the underlying documentary evidence themselves.

The Committee considered this verification sufficient and proportionate to establish the relevant facts for the purposes of its review.

The Committee further noted that the Council had not made possession of CiLCA an express condition of the officer's original appointment and had not subsequently introduced it as a contractual requirement.

The Committee found no evidence supporting an allegation that the officer had falsely claimed to hold the qualification or had misrepresented their professional credentials to the Council.

It considered that allegations concerning professional qualifications should be assessed against primary documentary evidence, rather than speculation or assumptions arising from publicly accessible biographical information.

Where concerns have been raised with third parties on a factual basis subsequently shown to be incorrect, the Committee considers it appropriate that accurate information should be provided to those parties, proportionate to the circumstances and the Council's responsibilities.

Consideration will therefore be given to appropriate factual corrections to any identified recipients of materially inaccurate information, without disclosing unnecessary personal employment records.

10.5. Employment Rights, Contractual Requirements and Proportionality

The Committee also considered whether the matters raised in the complaint necessitated any retrospective amendment to the officer's employment arrangements.

It concluded that the complaint provided no evidential basis for such action.

The Committee recognised that the Council, as an employer, must distinguish between the legitimate management of its workforce and attempts to impose employment requirements which did not form part of the original appointment.

Any proposal to introduce additional mandatory professional qualifications, substantially amend contractual responsibilities or vary the officer's terms of employment would require separate consideration through the Council's established employment procedures, having regard to contractual obligations, consultation requirements and appropriate professional HR advice.

The Committee further noted that the officer's contractual arrangements contained provisions potentially relevant to salary progression where additional qualification requirements were imposed. Any such proposal would therefore require assessment of its contractual and financial consequences.

It would not be appropriate to treat a historical complaint as an alternative mechanism for imposing retrospective employment conditions without first establishing a proper lawful basis for doing so.

The Committee also considered the position concerning the publication of personal professional information.

Whilst the Council may determine what information is reasonably necessary for its official website and may establish appropriate standards for the accuracy of published content, this does not create an unrestricted entitlement to require an employee to disclose additional personal documentation or maintain an extensive public professional biography.

The Committee considered that any such requirement must have a legitimate operational purpose and be proportionate to the officer's duties, contractual obligations and applicable data protection requirements.

The Committee noted the officer has since removed their biography.

The officer's preference regarding the inclusion or removal of optional biographical information should therefore be respected.

10.6. Data Protection and Disclosure of Employment Records

The Committee considered the Council's responsibilities under the UK General Data Protection Regulation and the Data Protection Act 2018.

It noted that employment records, including professional qualification documentation, constitute personal data and that their processing and disclosure must be supported by an appropriate lawful basis.

The Committee had undertaken direct verification of the qualification documentation for the specific purpose of determining the factual questions arising from the complaint.

It considered that the examination undertaken by the three Committee members was an appropriate and proportionate means of establishing the relevant facts.

The Committee found no immediate operational necessity to circulate copies of the officer's qualification records more widely for the purposes of this complaint.

It further noted that public interest in the proper recruitment and qualification of council officers does not automatically confer an unrestricted right of access to their underlying personal employment documentation.

Any subsequent request for disclosure would require consideration on its own merits under the applicable information rights legislation, with due regard to the Council's obligations under the UK General Data Protection Regulation and the Data Protection Act 2018. The Committee noted that any disclosure of personal employment records must have an appropriate lawful basis and be necessary and proportionate in the circumstances. Disclosure without a valid lawful basis could expose the Council to regulatory, legal and reputational risks.

The Committee was satisfied that its findings could be communicated fully and transparently without the unnecessary disclosure of the officer's personal employment records. It further considered that the legitimate public interest in accountability and transparency could be appropriately served through the communication of its independently verified findings, without extending disclosure beyond what is necessary for that purpose.

The Committee further determined that, having independently examined and verified the relevant documentation, there was no identified necessity or legitimate Council business purpose for further requests by individual Councillors for access to the officer's personal qualification or employment records, whether during Council or Committee meetings, through correspondence, or by any other means. The Committee considered that repeated requests, in the absence of material new evidence or a demonstrable governance requirement, would be unnecessary and disproportionate, potentially exposing the Council to avoidable data protection and employment-related risks.

Accordingly, Councillors should not seek further disclosure of these records through informal or routine Council business. Any future request must be supported by an identifiable and legitimate Council purpose and considered through the appropriate formal procedures, having regard to the Council's legal obligations and the officer's rights. This does not restrict any statutory entitlement to information or the proper exercise of legitimate Council oversight.

10.7. General Power of Competence

For completeness, the Committee also considered representations concerning the relationship between CiLCA and the Council's eligibility to exercise the General Power of Competence under the Localism Act 2011.

The Committee noted that eligibility for this power is determined by statutory conditions, including the relevant qualifications and training of the Clerk, the proportion of councillors declared elected, and the adoption of the necessary Council resolution.

The Committee understood that the Council had not satisfied the separate elected-members eligibility threshold at the relevant time.

Accordingly, possession of CiLCA by the Clerk would not, of itself, have rendered the Council eligible to exercise the General Power of Competence.

The Committee therefore considered that the existence or otherwise of such eligibility did not establish that CiLCA had been an essential qualification for the officer's original appointment.

Any future proposal for the Council to qualify for the General Power of Competence would require consideration of all applicable statutory conditions, rather than the officer's qualifications in isolation.

Such a proposal would be a separate matter for the Council and would not retrospectively change the qualification requirements applicable to the 2020 recruitment exercise.

10.8. Committee's Overall Determination

Having considered the available evidence, the Committee reached the following conclusions:

Recruitment: the officer's appointment followed an advertised recruitment exercise which failed to identify a suitable external candidate. The subsequent permanent appointment was made on terms determined by the Council, with external professional advice informing the role and salary arrangements.
Qualification requirements: no evidence was identified that the officer failed to meet any essential professional qualification requirement established by the Council at the time of appointment.
Website chronology: the allegation that the officer authored or published their biography in June 2020 is contradicted by the contemporaneous correspondence, employment chronology and independent technical evidence obtained from the website provider. In particular, the principal chronological allegation relied upon an interpretation of website metadata which the Council's own technical provider has expressly clarified as incorrect.
Professional qualifications: the Committee directly examined the officer's CiLCA documentation and was satisfied as to the qualification evidenced by those records.
Misrepresentation: no evidence was identified to substantiate an allegation that the officer knowingly misrepresented their qualifications, recruitment history or professional credentials.
Employment implications: the Committee identified no basis arising from the complaint for disciplinary action, adverse employment findings or retrospective changes to the officer's contractual terms.
Data protection: the Committee considered its verification of the qualification documentation sufficient for the purposes of the review, without any wider disclosure required.

The Committee was particularly concerned to distinguish between the existence of a complaint and the existence of evidence capable of substantiating that complaint.

The Committee concluded that the complaint was not upheld, that no adverse finding against the officer was warranted, and that no further action was required in respect of the officer's appointment or professional conduct arising from the matters considered. The Committee further considered that the expenditure of additional public resources revisiting the same factual allegations would require a clear and identifiable justification, such as the production of material new evidence.

The Council is asked to receive and note the Committee's findings.

11. Compliance with the Working Time Regulations 1998

The Staffing Committee also considered an allegation that the Council had failed to comply with the Working Time Regulations 1998, particularly in relation to the statutory maximum average working week of 48 hours.

The Committee reviewed the relevant employment documentation and confirmed that, upon commencement of employment, the officer had entered into a written agreement voluntarily opting out of the 48-hour average weekly working limit, as expressly permitted under Regulation 5 of the Working Time Regulations 1998.

The Committee noted that the legislation expressly provides for such arrangements and that working beyond the statutory 48-hour average does not, in itself, constitute a breach where a valid opt-out agreement remains in force.

The Committee further distinguished between the statutory provisions governing maximum weekly working hours and the Council's wider obligations concerning rest periods, annual leave, and employee health and safety, which are not extinguished by an opt-out agreement.

Accordingly, the Committee found no evidential basis for the allegation that the officer's working hours were unlawful merely by reason of exceeding the statutory 48-hour average, given the existence of the written opt-out agreement that the law expressly permits.

The Committee was satisfied that the documentation addressed the specific concern raised regarding the maximum weekly working limit and identified no grounds arising from that allegation for an adverse finding against the Council or its officer.

The Committee therefore concluded that this element of the complaint was not upheld.

The Staffing Committee also considered representations concerning the officer's employment with other authorities and the suggestion that there may have been duplication or overlap in the hours worked.

The Committee noted that no documentary evidence had been presented to substantiate an allegation that the officer had received remuneration from two employers for the same hours, or that the officer had otherwise failed to fulfil their contractual obligations to the Council.

The Committee recognised that it is entirely lawful for an employee, including an officer employed by a parish or town council, to hold additional positions of employment concurrently, provided that they continue to discharge their contractual duties and comply with any applicable requirements concerning conflicts of interest, confidentiality, working time and professional conduct.

The Committee further recognised that the mere existence of concurrent employment does not establish misconduct, contractual non-compliance or any inference of financial impropriety. The relevant consideration is whether the employee has satisfactorily discharged their obligations to each employer, rather than the number of employment relationships they maintain.

In considering whether further enquiries were warranted, the Committee had particular regard to the Council's responsibilities as an employer, including the implied duty of mutual trust and confidence, the requirement to act reasonably, and the principles of necessity and proportionality under applicable data protection legislation.

The Committee considered that the existence of additional employment, without any supporting evidence of conflicting working hours, unmet contractual obligations or another legitimate employment concern, did not provide a sufficient basis to initiate an intrusive investigation into the officer's separate employment arrangements.

While the Council retains the right to make reasonable and proportionate enquiries where a legitimate operational, contractual, safeguarding or statutory justification exists, such enquiries should be based upon an identifiable and objective purpose, rather than speculation arising solely from the fact that an employee holds more than one position.

The Committee was mindful that investigations undertaken without proper justification may expose the Council to avoidable employment relations and data protection risks, particularly where they involve seeking personal employment information from third parties.

Having considered the information available, the Committee found no evidential basis for concluding that the officer had duplicated working hours, received remuneration for duties not performed, or otherwise failed to meet their contractual obligations to the Council.

Accordingly, the Committee concluded that this element of the complaint was not upheld, and that no further investigation or disclosure of the officer's separate employment arrangements was warranted on the evidence presented.

The Committee further determined that the matter should not be reopened in the absence of material new evidence or another properly identified and proportionate employment or governance requirement.

The Committee also concluded that, where materially inaccurate allegations have been communicated to identifiable third parties, appropriate steps should be taken to correct the factual record and ensure that the Committee's independently verified findings are brought to their attention. Such correspondence should be factual, proportionate and limited to correcting the misinformation identified.

Having undertaken a comprehensive review of the matters raised, the Committee determined that there was no justification for individual Councillors to continue seeking explanations, personal employment information or further assurances directly from the officer in relation to allegations which had already been examined and determined. Any genuinely new concerns should instead be referred through the Council's established governance and employment procedures, rather than pursued through repeated individual enquiries.

The Committee expressly recognised the Council's duty of care towards its employees, including its responsibility to take reasonable steps to safeguard their health, wellbeing and dignity at work. It further acknowledged that employees should not be subjected to unjustified, persistent or repetitive allegations, or inappropriate personal scrutiny, merely by virtue of holding a position of public employment.

The Committee noted that the right to raise legitimate concerns regarding public administration does not confer an unrestricted entitlement to repeatedly pursue an individual employee in circumstances where the substantive allegations have been properly investigated and no supporting evidence has been identified.

Following publication of these findings, the Committee will keep under review any further repetition or circulation of materially inaccurate allegations, particularly where such conduct is persistent, targeted or undertaken without material new evidence. Where appropriate, the Council will consider whether the circumstances engage its employment protection, dignity at work, member conduct or other relevant policies, and whether proportionate protective measures are necessary.

The Committee considered that, having discharged its responsibility to investigate the concerns objectively, the Council must equally discharge its responsibility to protect its employees from unwarranted and potentially detrimental continued pursuit of matters for which no evidential foundation has been established.

The Committee concluded that the complaint was not upheld, that no adverse finding against the officer was warranted, and that no further action was required in respect of the complaint. The Council is asked to receive and note the Committee's findings.

12. Additional Resource Capacity

The Staffing Committee considered the Council’s increasing workload and the challenges of maintaining statutory compliance, delivering existing services and progressing projects within current staffing capacity.

Over the past 12-24 months, significant additional officer time has been required to manage Freedom of Information (FOI) requests, Subject Access Requests (SARs), data-protection complaints, Information Commissioner’s Office (ICO) correspondence, employee-related allegations and wider information-governance responsibilities.

These duties extend beyond responding to individual requests and include information security, records management, policy development, staff and member training, data-breach investigations, data-protection impact assessments, regulatory compliance and, where appropriate, consideration of employee welfare and potential harassment.

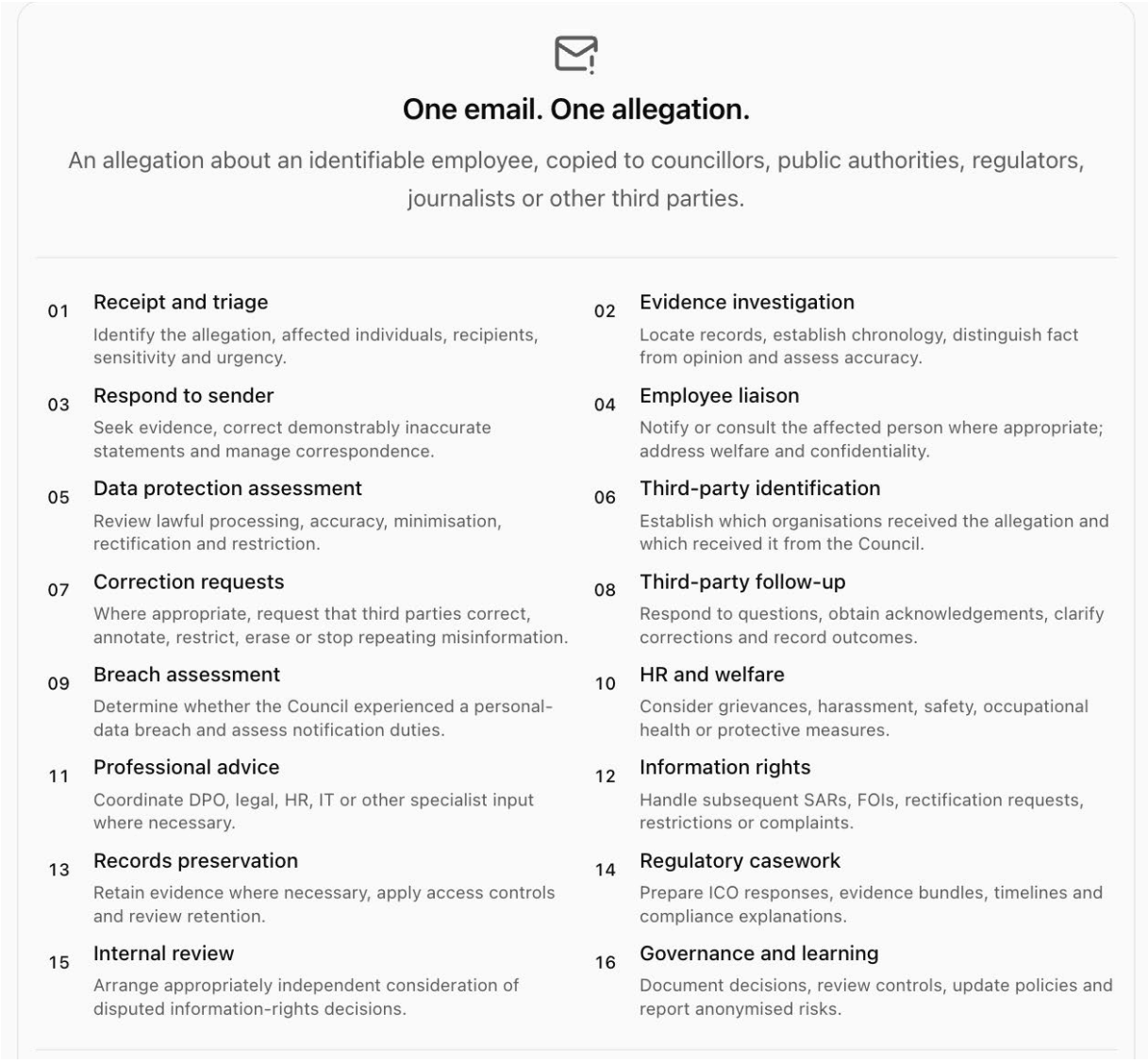
The Staffing Committee also noted the changes in the law that came into effect in October 2026 in relation to the Council's additional duties regarding the prevention of harassment.

The cumulative impact has diverted substantial officer capacity from other statutory, operational and strategic responsibilities.

The Committee recognises that the Council remains responsible for fulfilling its statutory obligations regardless of available staffing resources. Where members are aware that workload exceeds existing capacity, they must make informed decisions about additional resources, service priorities and the associated risks.

The Council must also recognise its duty of care towards employees. It cannot reasonably expect existing service levels to be maintained indefinitely without sufficient resources, nor expect employees to routinely undertake unpaid work beyond their contractual hours.

Case Study: How One Email Can Generate Weeks of Work



Scenario

A single email containing allegations about an identifiable employee, particularly where circulated to councillors, public authorities, regulators, journalists or other third parties, may generate substantial consequential work.

Even where allegations are subsequently disputed, unsupported or demonstrated to be inaccurate, the Council may need to:

- Assess the allegations, establish relevant facts and review supporting evidence.
- Consider the accuracy, lawfulness, security and retention of personal information.
- Liaise with affected employees, the author and relevant third parties.
- Assess requests for rectification, restriction or access, including any applicable obligations under Article 19 UK GDPR where the Council has disclosed information.
- Consider potential data breaches, employment obligations, employee welfare and harassment risks.
- Manage subsequent FOI requests, SARs, ICO enquiries, complaints or legal correspondence.
- Maintain appropriate records, audit trails and documented decisions.

Where inaccurate information has been independently circulated by third parties, the Council may consider proportionate corrective correspondence, although it does not automatically become responsible for disclosures made independently by others.

The following illustrates the potential officer time arising from one substantive allegation:

Activity	Hours
Initial assessment and classification	2
Evidence gathering and accuracy review	4
Data-protection assessment	3
Correspondence with affected employee	2
Correspondence with third parties	4
Rectification and restriction assessment	3
Breach assessment and documentation	2
HR and management liaison	3
DPO and legal liaison	2
Subsequent FOI/SAR casework	8
Follow-up correspondence	4
Records, retention and closure	2
Total illustrative resource	39 hours

These estimates are illustrative and do not represent fixed processing requirements. Not every activity will arise in every case, and some work may overlap.

However, the Council currently receives approximately one to two emails of this nature each week, demonstrating the potential cumulative impact on available resources.

Where allegations or complaints concern an identifiable employee, the Committee recognises that the Council, as employer, must retain responsibility for their appropriate assessment, administration and management, rather than placing that burden upon the employee who is the subject of the allegations.

This approach is consistent with ACAS guidance on workplace investigations[1], which recommends that investigations be conducted by someone not personally involved in the matter, wherever practicable, to avoid conflicts of interest and ensure fairness, objectivity and impartiality. ACAS further emphasises the importance of considering the welfare of employees involved in complaints and maintaining appropriate confidentiality.

The Committee therefore considers that, where appropriate, complaints concerning employees should be allocated to a suitably independent officer, HR professional or external investigator, with arrangements proportionate to the nature and seriousness of the allegations. The affected employee should be given a fair opportunity to respond where necessary, but should not ordinarily be responsible for investigating, administering or determining complaints concerning their own conduct.

Such arrangements protect the integrity of the Council's decision-making, reduce actual or perceived conflicts of interest, support employee welfare and demonstrate compliance with recognised employment best practice and the Council's duty of care.

The Committee also recognises that some recurring administrative work could be reduced through improved procedures, standardised responses, case-management arrangements and clear escalation thresholds. However, developing these improvements itself requires additional capacity.

Financial and Corporate Risk Assessment: Consequences of Not Establishing Additional Capacity

Members should recognise that the financial consequences of inadequate information-governance arrangements extend considerably beyond the possibility of regulatory enforcement or financial penalties. A single poorly managed incident can generate expenditure through further investigations, requirements for external legal advice, IT remediation, employee grievances, regulatory correspondence, further information-rights requests, corrective training and potential compensation claims.

The following assessment is indicative of risks of not establishing additional capacity and the financial case for dedicated Information Governance capacity should therefore not be assessed solely by comparing the salary of the proposed post against the direct cost of responding to statutory requests. It should also consider the potential reduction in avoidable investigations, duplicated correspondence, emergency professional advice, repeated incidents, inefficient records searches and senior management displacement.

Risk	Potential Impact and Cost of Failure	Proposed Mitigation
Outstanding statutory requests	ICO complaints, decision notices, further casework, repeated correspondence and potential enforcement. Complex recovery exercises may require external legal assistance.	Dedicated case management, deadline monitoring, backlog recovery plan and early escalation.
Insufficient staff/member training	Employees/members may fail to recognise SARs, inadvertently disclose sensitive information or mishandle records. Consequences may include investigations, external advice, grievances, compensation claims and emergency retraining. Illustrative compensation cost of improper disclosure £1,000-£10,000+	Mandatory role-appropriate induction, regular refreshers, specialist training and recorded completion.

[1] https://www.acas.org.uk/investigations-for-discipline-and-grievance-step-by-step/step-2-preparing-for-an-investigation

Weak incident learning	Repeat breaches may suggest that identified weaknesses were not adequately addressed. Further investigations, technical remediation, professional advice and claims may follow. Potential cumulative expenditure: £2,000–£20,000+ for a serious recurring issue.	Root-cause reviews, corrective-action register, technical improvements and follow-up assurance.
Inadequate DPIA capacity	High-risk processing may commence without proper assessment, potentially requiring suspension, redesign or replacement of systems. Possible remediation: £2,000–£25,000+, depending on the project.	DPIA screening, project approval controls and specialist DPO input.
Inconsistent or outdated policies	Incorrect procedures, missed deadlines, inconsistent staff decisions, avoidable complaints and increased difficulty defending the Council's actions.	Controlled policy register, scheduled reviews, legal updates and staff briefings.
Inappropriate access permissions	Unauthorised access to personnel, payroll, health or complaint records. Possible data breaches, IT forensic work, employee grievances, legal claims and compensation. Illustrative exposure: £2,000–£25,000+, with higher exposure in serious cases.	Role-based access, periodic permissions reviews, secure sharing, audit logs and prompt revocation.
Lack of independent case allocation	Actual or perceived conflicts may generate additional ICO correspondence, requests for reconsideration, external reviews, legal advice and challenges to decisions. Possible additional cost: £500–£5,000+ per complex dispute (existing officer time or locum)	Conflict screening, documented allocation decisions, independent reviews and alternative case handlers.
Poor records management	Excessive search time, inability to locate relevant documents, incomplete responses, accidental disclosure, excessive retention and legal-disclosure difficulties. Potential expenditure: £1,000–£10,000+ for a substantial retrieval or remediation exercise.	Information asset register, retention schedules, searchable records and controlled disposal.
Limited proactive publication	Repeated FOI requests, avoidable correspondence and duplication of work. Indicative internal cost: hundreds or thousands of pounds annually, depending on volume and complexity.	Updated publication scheme, disclosure log and routine publication of frequently requested information.
Limited member reporting	Emerging risks may remain unidentified, allowing recurring problems or overdue corrective actions to escalate. No reliable standalone cost estimate; potentially significant consequential exposure.	Quarterly anonymised performance reports, risk monitoring and annual governance review.
Dependence on individual senior officers	Senior management displacement, delayed projects, vulnerability during absence and expensive emergency cover.	Dedicated specialist resource, documented procedures and resilience arrangements.
Insufficient evidence of compliance	Difficulty demonstrating training, lawful decisions, security measures or breach remediation to the ICO or a court. Additional investigations, legal advice and corrective work may be required. Potential cost: £1,000–£10,000+ per substantial investigation.	Central compliance records, audit trail, training evidence, risk assessments and action tracking.
Failure to identify or report a personal-data breach	Delayed containment, further disclosure, regulatory investigation, possible compensation claims and additional remediation. Potential cost: £2,000–£25,000+, excluding serious litigation or regulatory penalties.	Central breach reporting, documented risk assessments, escalation procedures and notification decisions.
Incorrect handling of employee medical or special-category data	Exposure of sensitive information, distress, grievances, sickness absence, potential discrimination or privacy claims and legal fees. Potential exposure: £3,000–£30,000+, highly dependent on the facts.	Specialist processing controls, restricted access, training, lawful-basis assessments and DPO oversight.

Failure to rectify inaccurate personal information	Continued reliance on misinformation, repeated complaints, reputational harm, legal disputes and possible compensation claims. Potential cost: £1,000–£10,000+, potentially more if employment decisions are affected.	Accuracy assessments, rectification procedures, controlled annotations and appropriate recipient notifications.
Inadequate supplier and processor oversight	Third-party security incidents, contractual disputes, emergency migration, data recovery and regulatory scrutiny. Potential exposure: £2,000–£25,000+, or more for a major systems incident.	Processor-contract reviews, supplier due diligence, security requirements and breach escalation arrangements.
Unlawful or excessive retention of information	Increased exposure during breaches, unnecessary disclosure, complaints, retrieval costs and remediation. Potential cost: £1,000–£10,000+ for significant corrective exercises.	Retention schedules, legal holds, periodic reviews and secure deletion.
Failure to protect employees from repeated misuse of their personal information	Employee welfare concerns, grievances, sickness absence, HR investigations, possible harassment-related proceedings and legal expenditure. Potential exposure: £2,000–£30,000+, depending on the conduct and resulting harm.	Coordinated IG/HR escalation, appropriate risk assessments, controlled correspondence and specialist legal advice.

The following table identifies the principal requirements relevant to the council's lawful role in regards to its data processing.

Legal Framework	Council Responsibility	Risk without Officer Capacity
UK GDPR Articles 5 and 24	Lawful processing, accountability and demonstrable compliance	Inability to evidence appropriate governance
UK GDPR Articles 25 and 32	Data protection by design/default and appropriate security	Unnecessary access, disclosure or loss
UK GDPR Articles 12–22	Facilitate and respond to individual information rights	Delays, complaints and unlawful processing
UK GDPR Articles 33–34	Record and, where required, notify personal-data breaches	Missed reporting duties and avoidable harm
UK GDPR Articles 30 and 35	Maintain applicable processing records and undertake required DPIAs	Undocumented processing and unassessed risks
UK GDPR Articles 37–39	DPO arrangements, independence, advice and monitoring	Insufficient independent oversight or DPO support
Data Protection Act 2018	Additional conditions and safeguards for sensitive processing	Mishandling health, criminal-offence or other protected data
Freedom of Information Act 2000	Respond to requests and maintain a publication scheme	Statutory non-compliance and ICO intervention
Environmental Information Regulations 2004	Provide environmental information and operate appropriate review procedures	Delays and challenge to decisions
FOIA Section 46 Code	Appropriate records-management practices	Incomplete searches, inefficient retrieval and retention failures
Equality Act 2010	Equality duties and reasonable adjustments where applicable	Disadvantage to individuals and associated claims
Employment and health-and-safety law	Reasonable protection of employees from foreseeable workplace risks	Grievances, sickness, claims and employee welfare concerns
Human Rights Act 1998	Respect applicable Convention rights, including privacy and expression	Disproportionate processing or disclosure
Privacy and Electronic Communications Regulations	Compliant electronic communications where applicable	Unlawful marketing or communications practices

Recommendation of the Staffing Committee

Having considered the Council's existing staffing capacity, increasing statutory and governance responsibilities, the risks associated with insufficient resources, and its duty of care towards employees, the Staffing Committee recommends that the Council approve additional temporary staffing capacity for an initial 3-6 month period.

The Committee recognises that the Council cannot reasonably expect its existing employees to absorb an increasing workload indefinitely, undertake additional unpaid hours, or maintain all existing service levels without adequate resources.

The Committee therefore recommends that budget be allocated from the Council's General Reserves to fund the procurement of additional locum support, subject to a maximum hourly rate of £25ph, and ten hours per week.

The additional capacity will be prioritised towards information-rights casework, information governance, regulatory correspondence, records management, policy development and associated administrative responsibilities, alongside other governance work.

The Committee emphasises that approving additional capacity is a proportionate and preventative measure, intended to reduce corporate risk, strengthen statutory compliance, protect existing employees from unreasonable workloads and release officer capacity for the delivery of the Council's wider objectives.

The position should be reviewed by the Staffing Committee towards the end of the initial three-month period to assess whether the additional capacity has adequately addressed the identified pressures. The Committee should thereafter be delegated authority to approve the continuation, extension or recommissioning of additional resource support, either at the conclusion of the initial period or at any future date, subject to demonstrable business need, available budget and the Council's applicable procurement requirements.

13. Facebook (Social Media)

The Council is asked to consider establishing an official Facebook page to improve communication with residents and provide timely updates on Council activities, ongoing projects, achievements and outcomes.

The page would provide a simple, accessible platform for sharing accurate information directly with residents, increasing transparency and public awareness of the Council's work.

Content could be published as frequently or infrequently as considered appropriate. Comments could also be disabled, allowing the page to operate primarily as an information-sharing platform rather than a public discussion forum, reducing moderation requirements and associated administrative costs.

The responsibility for its administration and publication of content would be delegated to officers.

14. Finance - to consider and accept the Q2 summary accounts, and bank reconciliations.