Policy Updates: Summary of Changes

Committee	Policy and Resources Committee
Date of meeting	2 December 2026
Agenda item	11, 12 and 13
Report author	Tor Warburton CiLCA, Town Clerk and Responsible Financial Officer
Purpose	For decision: to recommend to Full Council

1 Purpose of report

1.1 To present sixteen updated or new documents, with two supporting update reports, that bring the Council's policies into line with the law in force at November 2026 and with Standing Orders, and to seek the Committee's recommendation to Full Council. The documents are considered under agenda items 11 (employment policies), 12 (safeguarding and DBS) and 13 (data protection).

2 Recommendations

That the Policy and Resources Committee:

2.1 **notes** the summary of changes in section 4 and the changes made since the HR Sub-Committee in section 5;

2.2 **recommends** to Full Council that the documents listed in section 4, as amended in section 5, be adopted, with the date and minute number of adoption inserted in each version table and the DRAFT watermark removed;

2.3 **recommends** to Full Council that, on adoption, the following be withdrawn: the Data Protection Policy and Procedure (January 2026), the Safeguarding Policy 2026 (October 2026), the DBS Policy 2026 (July 2026), the Privacy Statement 2023, the Privacy Notice and Cookie Statement, and any previous versions of the employment policies and the Scheme of Delegation listed in paragraph 3.1;

2.4 **notes** that the Data Protection Policy v2.0 replaces the Data Protection Policy and Procedure recommended on 18 November 2026 (PR 061/11/26), and that its sections 6.2 and 6.3 replace the Data Protection Complaints and Rights Requests Procedure recommended under the same minute, which will not go forward to Full Council;

2.5 **recommends** to Full Council that it appoints a Staff Appeals Committee of three councillors who are not members of the HR Sub-Committee, to hear appeals against decisions of the HR Sub-Committee under the employment policies, as set out in section 5 of the Scheme of Delegation; and

2.6 **notes** that consequential amendments to the Complaints Procedure and Policy (data protection complaints route) and the Records Retention Scheme (interim retention periods) will be brought to a future meeting.

3 Background

3.1 The HR Sub-Committee recommended the following to this Committee on 25 November 2026 (draft minute HR 044/11/26): the Adoption Leave, Adoption Pay and Shared Parental Leave Policy; Carer's Leave Policy; Dignity at Work Policy; Flexible Working Policy; Lone Working Policy; Neonatal Care Leave and Pay Policy; Sexual Harassment Prevention Policy; Disciplinary Policy; Grievance Policy; and the Scheme of Delegation, amended to reflect those policies. Standing Orders give staffing matters to the HR Sub-Committee.

3.2 The Appropriate Policy Document, DBS Policy, Data Protection Policy, Data Protection Training Policy, Safeguarding Policy and Privacy Notice 2026 come to this Committee directly.

3.3 On 18 November 2026 the Committee deferred the separate privacy notices so that they could be combined into a single document (PR 062/11/26), and noted the Internal Auditor's recommendation that councillors receive data protection training each year (PR 063/11/26). The combined Privacy Notice 2026 and the new Data Protection Training Policy respond to those decisions.

3.4 The main legal changes behind the updates are the Employment Rights Act 2025, the Data (Use and Access) Act 2025 (including the replacement of the Information Commissioner with the Information Commission on 30 September 2026), the Crime and Policing Act 2026, the Children's Wellbeing and Schools Act 2026 and Working Together to Safeguard Children 2026. The data protection documents also support the Council's response to Assertion 10 (Digital and data compliance) in the Practitioners' Guide 2025.

4 Summary of changes

Document	Main changes	Why
Adoption Leave, Adoption Pay and Shared Parental Leave (draft 0.2)	Redundancy protection; day-one adoption and paternity rights; appointment rights; HR Sub-Committee decides repayment waivers	2024 redundancy protection; April 2026 paternity changes; Financial Regulation 11.3
Appropriate Policy Document (draft 1.1)	Information Commission named; DBS certificates not kept; complaints route set to section 6.3 of the Data Protection Policy; volunteers' DBS checks moved to the safeguarding condition; access to safeguarding records limited to the DSL and deputy; interim retention periods; cross-references aligned with the new Data Protection, Safeguarding and DBS policies and the single Privacy Notice	Regulator changed 30 September 2026; complaints duty from 19 June 2026; the employment condition does not cover volunteers; consistency across the policy suite
Carer's Leave (draft 0.2)	Seven-day postponement notice; HR Sub-Committee decides any paid leave; unpublished policies removed	Carer's Leave Regulations 2024; Financial Regulation 11.3
Dignity at Work (draft 0.2) and update report	"All reasonable steps" and third-party harassment duty; harassment definition corrected; councillor complaints to the Monitoring Officer; grievance route	Employment Rights Act 2025 (30 October 2026); Equality Act 2010, s.26; Code of Conduct process

Document	Main changes	Why
Flexible Working (draft 0.2) and update report	Clerk decides under delegation; HR Sub-Committee hears the Clerk's requests and appeals, with the Staff Appeals Committee hearing appeals against its decisions (section 5); 2027 review trigger	Standing Orders; Financial Regulation 11.3; Employment Rights Act 2025
Lone Working (draft 0.2)	Cash rules cite Financial Regulations 10.1 and 13.7; harassment risk added; accident log	Consistency with the Financial Regulations and the Health and Safety and Sexual Harassment policies
Neonatal Care Leave and Pay (draft 0.2)	Statutory notice rules; leave in whole weeks; redundancy protection; HR Sub-Committee approves any enhancement	Neonatal Care Leave Regulations 2024; Financial Regulation 11.3
Sexual Harassment Prevention (draft 1.1)	"All reasonable steps" throughout; third-party liability; whistleblowing protection; related policies corrected	Employment Rights Act 2025 (in force 6 April and 30 October 2026)
Grievance Policy (draft 1.2)	Clerk's grievances to the Chair of the HR Sub-Committee; appeals to the HR Sub-Committee or, where it made the decision, the Staff Appeals Committee (section 5); 10-day appeal period; councillor complaints to the Monitoring Officer	Standing Orders; removes the non-existent Staffing Sub-Committee and the vague 5 to 10 days
Disciplinary Policy (draft 1.2)	Appeals to the HR Sub-Committee or, where it made the decision, the Staff Appeals Committee (section 5); 10-day appeal period; sexual harassment named as gross misconduct; retention	Standing Orders; consistency with the Sexual Harassment Prevention Policy
Scheme of Delegation (draft v6)	HR Sub-Committee named; Clerk delegated flexible working and family leave; HR Sub-Committee decides the Clerk's requests, discretionary payments and appeals; Staff Appeals Committee and urgent-matters wording (section 5)	Standing Orders; Financial Regulation 11.3
DBS Policy (draft 1.3)	Supervised roles with children now in regulated activity; levels of check explained; regulated activity with adults; review of all roles; filtering and DBS Update Service; duty to refer to the DBS; councillor position aligned with the Safeguarding Policy; certificates not copied or kept; links to the Appropriate Policy Document	Crime and Policing Act 2026 (supervision exemption removed 1 September 2026); Safeguarding Vulnerable Groups Act 2006; Rehabilitation of Offenders Act 1974; DBS guidance; UK GDPR data minimisation
Safeguarding Policy (draft 2.0)	Working Together 2026; supervised roles now in regulated activity; information sharing duty; duty to report child sexual abuse adopted as the Council's minimum standard ahead of commencement; direct LADO referral if the DSL cannot be reached; councillor DBS position; annual review; retention periods	Working Together to Safeguard Children 2026; Crime and Policing Act 2026 (supervision exemption removed 1 September 2026); Children's Wellbeing and Schools Act 2026 (30 September 2026)

Document	Main changes	Why
Data Protection Policy (draft 2.0)	Full rewrite of the January 2026 policy; a single procedure for data protection complaints and rights requests (sections 6.2 and 6.3), replacing the separate procedure recommended under PR 061/11/26; complaints about the Town Clerk referred to the Town Mayor, with stage 2 review by this Committee or the HR Sub-Committee and the public excluded by resolution where personal data is discussed; no statutory DPO, with the Town Clerk as Data Protection Lead and the Committee and GDPR Officer as day-to-day lead; councillors, meetings, CCTV and AI sections; interim retention periods; single Privacy Notice	Data (Use and Access) Act 2025 (main changes 5 February 2026; complaints duty 19 June 2026); Standing Order 21; Complaints Procedure (PR 060/11/26); Public Bodies (Admission to Meetings) Act 1960; Practitioners' Guide 2025, Assertion 10
Data Protection Training Policy (draft 1.0)	New policy: induction and annual refresher for staff, councillors and volunteers; training matrix by role; briefing for councillors hearing stage 2 complaint reviews; records kept in the Training Register; steps for non-completion	UK GDPR Articles 5(2), 24 and 32(4); Practitioners' Guide 2025, paragraph 5.124; Internal Auditor's recommendation (PR 063/11/26); IT Policy 4.4; Training and Development Policy
Privacy Notice 2026 (draft)	Five draft notices (general, councillors, allotments, employees and volunteers, grant applicants) merged into one notice with a section for each group; duplication removed; new section on photographs and filming at events; contact, complaints route and cross-references aligned with the Data Protection Policy; address no longer tied to an office number	UK GDPR Articles 13 and 14; Data (Use and Access) Act 2025 complaints duty; the Committee's decision to combine the notices (PR 062/11/26); consistency with the Data Protection Policy
All documents	Committee names aligned; only published policies cross-referenced; the most recent policy titles (paragraph 5.2) and "Committee and GDPR Officer" used throughout; version tables set to draft	One consistent, accurate policy suite for approval

5 Changes since the HR Sub-Committee (25 November 2026)

5.1 After the HR Sub-Committee recommended the employment policies and the Scheme of Delegation (HR 044/11/26), officers reviewed them alongside the rest of the policy suite. The changes below have been made. Changes marked "Amendment" alter how a policy works and are for this Committee to confirm; the others are officer corrections that do not change a policy's effect. The policies are working documents and can be corrected after adoption: later officer corrections will be reported to this Committee, and any change of substance will come back to it for decision.

Document	Change since the HR Sub-Committee	Why
Disciplinary Policy	Amendment: appeals are heard by HR Sub-Committee members not previously involved or, where the HR Sub-Committee made the original decision (including any case involving the Town Clerk), by the Staff Appeals Committee. The option of appeal to "a different officer" is removed, and the "Mayor/Chair of Council" role is replaced by the Staff Appeals Committee.	The ACAS Code expects an impartial appeal, where possible by someone more senior who was not involved. No officer is senior to the Town Clerk, so an officer appeal could mean a junior officer reviewing the Town Clerk's decision. Only a committee or sub-committee appointed by the Council can take decisions (Local Government Act 1972, sections 101 and 102). Matches section 4 of this report.
Disciplinary Policy	Amendment: the "Informal Warning: 6 months" entry is removed from the warning periods.	Under the ACAS Code informal action is not a warning, and the policy's own list of outcomes includes no informal warning.
Disciplinary Policy	Officer corrections: stray text "[policy-suite.com]" and the drafting note "These are core ACAS requirements" removed; the version table, repeated on every page, now appears once; three run-together lines separated; text set in Open Sans, black, with a DRAFT watermark.	Accuracy and house style.
Grievance Policy	Amendment: appeals are heard by HR Sub-Committee members not previously involved or, where the HR Sub-Committee made the original decision (including any grievance raised by or concerning the Town Clerk), by the Staff Appeals Committee. The option of appeal to "a different manager" is removed, and the "Mayor/Chair of Council" role is replaced by the Staff Appeals Committee.	As for the Disciplinary Policy.
Grievance Policy	Officer corrections: drafting notes removed ("This reflects established SLCC/NALC practice", "These are core requirements under the ACAS Code", "Maintaining records is strongly recommended under ACAS guidance", and the reference to SLCC best practice in the review section); stray punctuation removed; version table now appears once; two run-together lines separated; text set in Open Sans, black, with a DRAFT watermark.	Policies should state what the Council does, not commentary on why; accuracy and house style.

Document	Change since the HR Sub-Committee	Why
Flexible Working Policy and update report	Amendment: where the HR Sub-Committee made the original decision (for example, a request from the Town Clerk), the appeal is heard by the Staff Appeals Committee instead of "a panel of councillors not previously involved". The update report (section 8) now matches and records that the Scheme of Delegation has already been amended; a new section 15 lists these changes.	A panel nobody has appointed cannot lawfully take decisions (Local Government Act 1972, sections 101 and 102).
Scheme of Delegation	Amendment: section 5 adds that appeals against a decision of the HR Sub-Committee are heard by the Staff Appeals Committee, appointed by Full Council from councillors who are not members of the HR Sub-Committee.	Gives every appeal a lawful route, including appeals involving the Town Clerk.
Scheme of Delegation	Amendment: urgent matters (section 6) are now decided by the Town Clerk after consulting the Mayor and the Chairman of this Committee, instead of "those consulted, together with the Town Clerk". This wording predates version 6.	Section 101 of the Local Government Act 1972 does not allow decisions to be delegated to individual councillors.
Adoption Leave, Adoption Pay and Shared Parental Leave; Carer's Leave	Officer corrections: drafting notes removed (Adoption: "prepared using principles reflected in…"; Carer's Leave: the passage on what other councils are considering, keeping the sentence that any enhancement is for the HR Sub-Committee under Financial Regulation 11.3).	Policies should state what the Council does.
Neonatal Care Leave and Pay	Officer correction: stray punctuation removed.	Accuracy.
Dignity at Work Policy and update report	Officer corrections: policy titles updated (see paragraph 5.2); new section 16 of the update report lists the changes.	Consistency across the policy suite.
All ten employment policies and the Scheme of Delegation	Officer corrections: policy titles updated (paragraph 5.2); DRAFT watermark added; headings and any coloured text set in black.	Consistency and house style.
Data Protection Policy, Safeguarding Policy and this report	Officer corrections: policy titles updated (paragraph 5.2).	Consistency across the policy suite.

5.2 Where documents used different titles for the same policy, one title is now used throughout:

(a) Data Protection Policy (version 2.0, for adoption on 9 December 2026), in place of "Data Protection Policy and Procedure", which it replaces;

(b) IT, Email and Digital Governance Policy: the current policy is published as the "I.T. Email and Digital Policy" and will take this title when it is next reviewed; until then it remains in force under its present title;

(c) Complaints Procedure and Policy, the title recommended by this Committee on 18 November 2026 (PR 060/11/26), in place of "Complaints Procedure"; and

(d) Records Retention Scheme, in place of "Record Retention Scheme".

5.3 The Staff Appeals Committee needs to be appointed by Full Council (recommendation 2.5) before it can hear any appeal. Until then, an appeal against a decision of the HR Sub-Committee would be referred to Full Council.

6 Implications

6.1 **Financial.** No direct cost. Data protection and safeguarding training will be met from the existing training budget under the Training and Development Policy.

6.2 **Legal.** Adoption reduces the risk of the Council acting on out-of-date policies, in particular the data protection complaints duty in force since 19 June 2026 and the removal of the supervision exemption for regulated activity with children from 1 September 2026. Full Council adopts the policies and the Scheme of Delegation, and appoints committees; this Committee makes recommendations.

6.3 **Risk.** Until the documents are adopted, the current versions remain in force. Several contain references to superseded legislation and guidance.

6.4 **Equality.** The employment policies support the Council's duties under the Equality Act 2010, including the duty to take all reasonable steps to prevent sexual harassment. The safeguarding and data protection documents protect children, adults at risk and people whose personal data the Council holds.

Background papers

HR Sub-Committee draft minutes, 25 November 2026 (HR 044/11/26); Policy and Resources Committee minutes, 18 November 2026 (PR 060/11/26 to PR 063/11/26); the documents listed in section 4; the HR Sub-Committee versions of the employment policies and Scheme of Delegation (25 November 2026), available from the Town Clerk.