



Okehampton Town Council

Okehampton Town Council

ASBESTOS MANAGEMENT PLAN

In partnership with:



**ENVIRONMENTAL
SERVICES**

**Environmental Services
48 Shillingford Road
Exeter EX2 8UB**

Current Issue Date: October 2025

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Overview

CAR 2012 Regulation 4

This asbestos management plan has been prepared by Environmental Services, Exeter in conjunction with Town Clerk, Emma James, the RP (Responsible Person for asbestos) at Okehampton Town Council, in order to discharge the responsibilities placed upon them by Regulation 4 “Duty to manage asbestos in non-domestic premises” of CAR (Control of Asbestos Regulations) 2012.

The purpose of the management plan is to ensure that staff, contractors and visitors to Okehampton Town Council’s properties are, as far as is reasonably practicable, not exposed to airborne asbestos fibre resulting from the disturbance of, accidental or otherwise, ACMs (asbestos containing materials,) or from ACMs in poor condition.

The management plan sets out the framework for compliance with Regulation 4 of CAR 2012 by addressing the discovery, identification, monitoring and reviewing of ACMs. In addition, this management plan also identifies the duties of the RP as well as the responsibilities, and procedures to be adopted by staff and contractors working within Okehampton Town Council’s properties.

The Dutyholder or RP (Responsible Person) for asbestos

CAR 2012 Regulation 4 (1)

The responsibility for the necessary arrangements relating to the implementation of the management plan rests with the RP for asbestos:

Emma James
Town Clerk
Okehampton Town Council
Town Hall, Fore Street
Okehampton EX20 1AA
01837 53179
townclerk@okehampton.gov.uk

Additional duties held by the RP include the arranging of:

- Twelve monthly reviews of the management plan, recording the findings and implementing any remedial action deemed necessary.
- Periodic inspections of all presumed and identified ACMs, recording the findings and implementing any remedial action deemed necessary.
- Investigations when an ACM is reported, or discovered, to have been damaged, recording the findings and implementing any remedial action deemed necessary.
- HSG 264 refurbishment/demolition asbestos surveys, prior to any structural alterations or disturbance of building fabric.

- Control of contractors with respect to the potential impact ACMs may have on planned and reactive work undertaken on behalf of the council.
- Staff training, where deemed appropriate.
- The provision of information, relating to ACMs, to the emergency services when required.
- HSE licensed asbestos removal contractors and subsequent four stage clearance air testing (by a UKAS accredited laboratory), when required.

Environmental Services, Exeter have been appointed as an independent, external consultant to assist the RP, where necessary, in the discharging of their duties. The point of contact and person with detailed knowledge of Okehampton Town Council's properties is:

Nicholas Mayne
Assistant Quality & Technical Manager
Environmental Services, Exeter
01392 438251 / 07890 450 756
nmayne@environmentuk.com

The strategy for ACMs and suspected ACMs

CAR 2012 Regulation 4 (6), (7) & (8)

It is the policy of Okehampton Town Council to leave in situ all presumed and identified ACMs that are detailed in their properties' asbestos registers, provided they are in good condition and unlikely to be disturbed. This approach will be adopted until:

- The RP is informed that an ACM has been accidentally damaged or is found as a result of periodic inspection.
- An ACM requires removal because of its unavoidable disturbance by proposed refurbishment/remodelling works.

If an ACM is found, or reported, to have been damaged, then the RP will assess the most appropriate course of action. The options available are either:

- Encapsulation or re-encapsulation of the ACM, with the frequency of periodic monitoring reviewed. Signage of the ACM may be considered, if not already in place.
- Protection or enclosure of the ACM, with the frequency of periodic monitoring reviewed. Signage of the ACM may be considered, if not already in place.
- Partial or complete removal of the ACM, which in certain circumstances involve the employment of a licensed asbestos removal contractor.

In any event, the RP will ensure that the decision-making process, remedial action taken and any resulting improvements are recorded, and the asbestos register amended accordingly (i.e. to reflect ACM enclosure, removal etc).

With regards to the signage referred to above, ACMs may, be signed with an asbestos warning label and/or a permit to work label, as illustrated below. The permit to work label may be used in conjunction with, or separate from the warning label, to highlight that a particular area or product may only be worked upon/within, after consultation with the RP. These two labels are not regarded as the method by which persons are prevented from disturbing ACMs. It is at the discretion of the RP to decide if none, one, or both of these labels is appropriate with respect to any given ACM or area containing ACMs.



Asbestos survey, registers and risk assessments

CAR 2012 Regulation 4 (3), (4), (5), (6), (7) & (8)

The requirement for a suitable and sufficient assessment as to whether ACMs are present within Okehampton Town Council properties lead to the commissioning of HSG 264 management asbestos surveys by the RP. This has resulted in the production of asbestos registers detailing the presence, type, extent and condition of ACMs used throughout the buildings. The preferred method is for positive identification through analysis by Environmental Services' UKAS accredited laboratory based in Exeter (testing laboratory number 2099). Where sampling has not taken place, for reasons of inaccessibility or avoiding causing damage, a presumption of asbestos will be made where considered appropriate. The asbestos register further records the overall risk rating of each occurrence based upon the combined scores of the material risk assessment (carried out during the survey by Environmental Services using the algorithm contained in appendix 4 of HSG 264) and the priority risk assessment (carried out with the assistance of the RP using the algorithm in appendix 3, table 3 of HSG 227).

The RP shall ensure that the periodic inspection of ACMs and subsequent updating of the asbestos registers is completed. This also applies to any other changes, such as following the removal or discovery of an ACM. The results of these inspections, changes, discoveries and action taken shall all be recorded.

Master copies of the asbestos registers are held by the RP at Okehampton Town Council and by Environmental Services.

Routine/planned maintenance works & contractors' responsibilities

CAR 2012 Regulation 4 (9) (c) (i) & CAR 2012 regulation 4 (2)

The RP has control of all contractors employed to work on Okehampton Town Council properties and the responsibility to ensure that they are aware of the risks associated with ACMs, together with the findings and limitations of the asbestos survey, register and management plan. Prior to the commencement of any maintenance work on an Okehampton Town Council property, the relevant building asbestos register will be consulted by the RP at the earliest opportunity in order to assess how the proposed work may potentially disturb ACMs either directly or indirectly.

If the fabric of a building is due to be disturbed, the RP will ensure that an HSG 264 refurbishment/demolition survey is undertaken of the affected area(s), as far in advance of the work commencing as is reasonably practicable. How best to deal with any identified ACMs can then be assessed by all relevant parties (the RP, the contractor, the architect, the CDM co-ordinator, Environmental Services).

At the planning stage, it will be decided if:

- The work may proceed unhindered.
- The work may proceed with care as ACMs are not directly affected by the work but are present within the working area.
- The work may only proceed after presumed ACMs are sampled to confirm they are asbestos free or, if subsequently identified as

asbestos, after arrangements are made for the material to be left undisturbed and in situ, or removed.

- The work may only proceed after identified ACMs, that will unavoidably be disturbed by the work, are removed in accordance with CAR 2012.

The RP will ensure that all contractors sign a register to confirm they have read and understood the asbestos register for the building they intend to work in, prior to the commencement of works. Contractors must be made aware, that if the scope of their work alters, the RP and register must be consulted further, before proceeding.

The asbestos register should be consulted as far in advance of the work commencing as is reasonably practicable.

The RP will ensure that a written record is kept of their joint consultation of the asbestos register with all contractors undertaking work at Okehampton Town Council properties. Such details will be recorded using the appropriate form (see appendix 2).

Environmental Services will ensure that the asbestos register is updated on completion of any additional material sampling carried out and/or asbestos removal undertaken.

Reactive/emergency maintenance works & contractors' responsibilities

CAR 2012 Regulation 4 (9) (c) (i) & CAR 2012 Regulation 4 (2)

The RP has control of all contractors employed to work on Okehampton Town Council properties and the responsibility to ensure that they are aware of the risks associated with ACMs, together with the findings and limitations of the asbestos survey, register and management plan. Prior to the commencement of any reactive/emergency maintenance work on an Okehampton Town Council property, the relevant building asbestos register will be consulted by the RP and the attending contractor, to assess how the proposed work may potentially disturb ACMs either directly or indirectly. At this stage, it will be decided if:

- The work may proceed unhindered.
- The work may proceed with care as ACMs are not directly affected by the work but are present within the working area.
- The work may only proceed after presumed ACMs are sampled to confirm they are asbestos free or, if subsequently identified as asbestos, after arrangements are made for the material to be left undisturbed and in situ or removed.
- The work may only proceed after identified ACMs that will unavoidably be disturbed by the work are removed in accordance with CAR 2012.

Environmental Services will be on hand to make an immediate visit should material sampling or advice be required.

If the fabric of a building is due to be disturbed, the RP will ensure that Environmental Services undertake an HSG 264 refurbishment/demolition survey of the affected area(s), as soon as is reasonably practicable.

The RP will ensure that all contractors sign a register to confirm they have read and understood the asbestos register for the building they intend to work in, prior to the commencement of works. Contractors must be made aware that if the scope of their work alters, the RP and register must be consulted further, before proceeding.

The RP will ensure that a written record is kept of their joint consultation of the asbestos register with all contractors undertaking work at Okehampton Town Council properties. Such details will be recorded using the appropriate form (see appendix 2).

Environmental Services will ensure that the asbestos register is updated on completion of any additional material sampling carried out and/or asbestos removal undertaken.

**Remodelling works, structural alterations and all other activities
involving the disturbance of the building fabric**

CAR 2012 Regulation 4 (3), (4), (5) & (8)

Prior to the commencement of any work that may disturb the fabric of an Okehampton Town Council building, the RP will ensure that the existing management asbestos survey is upgraded to an invasive refurbishment/demolition survey of the areas affected by the work, as early as is reasonably practical.

Where necessary, the RP will ensure that any identified ACMs, likely to be disturbed, are removed in accordance with CAR 2012 prior to the commencement of any refurbishment work. The employment of contractors who undertake asbestos removal within Okehampton Town Council's properties (licensed, non-licensed and notifiable non-licensed work), will be separated from any main building contract (for reasons of competitiveness) and be overseen by Environmental Services, to ensure regulatory compliance.

Environmental Services will ensure that the asbestos register is updated to reflect the findings of all refurbishment/demolition surveys carried out, including any subsequent work on ACMs (enclosing, removal etc).

Making information available to staff, including staff training

CAR 2012 Regulation 4 (2) & (9) (c) (i)

The RP will ensure that all staff of Okehampton Town Council, who are likely to come into contact with, or be affected by, ACMs within their area/place of work, are provided with adequate information, instruction and training as deemed necessary.

Key personnel will undertake asbestos awareness training, including the RP, who's responsibility it is to organise such training. Some of the topics included within the training will be the use of asbestos registers, the types of ACMs within Okehampton Town Council properties, what to do in the event of an ACM discovered/reported to be damaged, and the purpose and contents of the asbestos management plan.

The RP will reinforce Okehampton Town Council's position that no employee will undertake any work on ACMs.

Details of the provision of information, instruction and training to staff will be kept with the asbestos management plan (in appendix 5).

Making information available to the emergency services

CAR 2012 Regulation 4 (9) (c) (ii)

The RP will ensure that in the event of the emergency services being called to an Okehampton Town Council property, they have immediate access to all information relating to ACMs.

Reporting of damaged ACMs or materials suspected to contain asbestos

CAR 2012 Regulation 4 (2), (6), (7), (9) (b) & (10) (a)

If an ACM, or a material suspected of being an ACM is damaged or observed to have been damaged, then the area shall be vacated immediately, sealed, signed and the incident reported to the RP who, in conjunction with Environmental Services, shall undertake any necessary investigation and remediation (see page six for options). A subsequent investigation into the circumstances leading to the damage shall be carried out by the RP in order to establish the root cause of the incident and amend procedures to reduce the likelihood of a reoccurrence.

Using the appropriate form (see appendix 1), the RP will ensure that a written record of all such investigations is kept so that they may be referred to during the next review of the management plan.

Reviewing and recording of the risk assessment of each ACM and suspected ACM

CAR 2012 Regulation 4 (6) & (7)

The RP will arrange for Environmental Services, Exeter to review periodically, all ACMs and suspected ACMs to ensure they remain in good condition and that if damage is discovered, the appropriate course of action is considered and taken (see page six for options).

Using the appropriate form (see appendix 3), a written record of all reviews, their findings and conclusions will be kept by the RP and provided by Environmental Services.

Monitoring and reviewing of the management plan

CAR 2012 Regulation 4 (10)

This management plan will be subjected to a twelve-monthly review by the RP, and if necessary Environmental Services, in conjunction with the periodic reinspection of ACM's. It will require the input of and information gathered by, the RP to assess the effectiveness of the plan and whether any alterations are required as a result of changes in staff/contractors, or the accidental damage of an ACM.

The RP will use the appropriate form (see appendix 4) and keep a written record of all reviews, their findings and conclusions.



Okehampton Town Council

Okehampton Town Council

Freedom of Information Act 2000

DRAFT Publication Scheme

1. Purpose

This policy outlines the Town Council's approach to handling requests for information under the Freedom of Information Act 2000 (FOIA). It provides transparency in how the council operates, ensuring that individuals and organisations can access information held by the council, subject to exemptions.

2. Scope

The policy applies to all information held by the Parish Council, including records, documents, emails, and other forms of communication, whether in physical or electronic form. It covers any request for information made under the Freedom of Information Act 2000.

3. Making a Request

Requests for information can be made:

- In writing (by email or letter)
- Verbally (in person or by phone)
- Electronically (via email or the website)

Although requests can be made verbally, the council may ask for them to be confirmed in writing to ensure accuracy and clarity.

Requests should include:

- The requester's name and contact details
- A description of the information being requested
- The format in which the requester would prefer to receive the information (e.g., paper, email)

4. Timeframe for Response

The council will aim to respond to all FOI requests within 20 working days from the date the request is received. If the council needs more time to process the request or if an exemption applies, the requester will be informed.

5. Exemptions

Certain information may be exempt from disclosure under the Freedom of Information Act.

These exemptions include, but are not limited to:

- Personal data (under the Data Protection Act 2018)
- Information held for law enforcement purposes
- Commercially sensitive information
- Information that could harm national security

If an exemption applies, the council will explain why the information cannot be provided.

6. Charges for Information

In most cases, information will be provided free of charge. However, the council may charge for the time spent locating and preparing the information or for copying costs. If a charge applies, the requester will be informed in advance.

7. Refusal of Request

In certain circumstances, the council may refuse to provide the requested information.

Common reasons for refusal include:

- The request is too broad or vague
- The information is already publicly available
- The request falls under one of the exemptions

If a request is refused, the council will provide a clear explanation and, where possible, offer guidance on how to refine the request.

8. Review and Appeal

If a requester is dissatisfied with the council's response or decision, they may ask for an internal review. The review will consider whether the response complied with the law and whether the correct exemptions were applied. If the requester is still dissatisfied after the review, they may appeal to the Information Commissioner's Office (ICO).

9. Publication Scheme

In line with the Freedom of Information Act, the council maintains a Publication Scheme that provides information about the types of information the council routinely publishes, such as:

- Minutes and agendas for council meetings
- Annual accounts and financial reports
- Policies and procedures
- Contact details for councillors and staff

The Publication Scheme can be found below and accessed on the Town Council website.

10. Monitoring and Review

This policy will be reviewed every 2 years to ensure compliance with the Freedom of Information Act 2000 and any changes in legislation.

Information available from Okehampton Town Council under the Freedom of Information Act model publication scheme

This template guide covers only information we currently hold. If we do not hold some of the information listed below, we will mark it as 'not held' in the table.

Information to be published	How the information can be obtained	Cost (for hardcopy)
Class 1 - Who we are and what we do (Organisational information, structures, locations and contacts) Current information only	(Hardcopy and or website)	
List of Council Members and their responsibilities as well a list of Council Committees	Hard copy and website	5p per sheet
Details of any representation on local public bodies	Hard copy and website	5p per sheet
Postal and email address	Hard copy and website	5p per sheet
Contact details for Town Clerk and Council Members	Hard copy and website	5p per sheet
Where possible, these include named contacts including contact phone numbers and email addresses	Hard copy and website	5p per sheet
Location of main Council office and accessibility details	Hard copy and website	5p per sheet
Staffing structure	Hard copy and website	5p per sheet
Class 2 – What we spend and how we spend it (Financial information about projected and actual income and expenditure, procurement, contracts and financial audit) Current and previous financial year as a minimum	(hard copy and or website)	
Statement of accounts and internal audit report in the format included in the Annual Return form	Hard copy and website	5p per sheet
Finalised budget	Hard copy and website	5p per sheet
Precept	Hard copy and website	5p per sheet
Borrowing Approval letter	Not held	

All items of expenditure above £100 (all payments are listed on the website)	Hard copy and website	5p per sheet
Financial Standing Orders and Regulations	Hard copy and website	5p per sheet
Grants given Grants received	Hard copy and website Hard copy and website	5p per sheet
List of current contracts awarded and value of contract	Hard copy and website	5p per sheet
Members' allowances and expenses (Expenses only, allowances are not provided)	Hard copy and website	5p per sheet
Class 3 – What our priorities are and how we are doing (Strategies and plans, performance indicators, audits, inspections and reviews) Current and previous year as a minimum	(hard copy or website)	
Annual governance statement in format included in the Annual Return form	Hard copy and website	5p per sheet
Parish Plan (Transparency information)	Hard copy and website	5p per sheet
Annual Report to Parish Meeting	Hard copy and website	5p per sheet
Quality status	Not held	
Local charters drawn up in accordance with DLUHC's guidelines	Not held	
Data Protection impact assessments (in full or summary format) or any other impact assessment (eg Health & Safety Impact Assessment, Equality Impact Assessments etc), as appropriate and relevant	Hard copy and website (some information may be available by hard copy only)	5p per sheet
Class 4 – How we make decisions (Decision making processes and records of decisions) Current and previous council year as a minimum	(hard copy or website)	
Timetable of meetings (Council and any committee/sub-committee meetings and parish meetings)	Hard copy and website	5p per sheet
Agendas of meetings (as above)	Hard copy and website	5p per sheet

Minutes of meetings (as above) – exclude material that is properly considered to be exempt from disclosure	Hard copy and website	5p per sheet
Reports presented to council meetings – exclude material that is properly considered to be exempt from disclosure	Hard copy and website	5p per sheet
Responses to consultation papers	Hard copy	5p per sheet
Responses to planning applications (available in Planning Committee Minutes)	Hard copy and website	5p per sheet
Bye-laws	Hard copy and website	5p per sheet
Class 5 – Our policies and procedures (Current written protocols, policies and procedures for delivering our services and responsibilities) Current information only	(hard copy or website)	
Policies and procedures for the conduct of Council business: <ul style="list-style-type: none"> • Procedural standing orders • Committee and sub-committee terms of reference • Delegated authority in respect of officers • Code of Conduct • Policy statements 	Hard copy and website Hard copy Hard copy and website Hard copy and website Hard copy and website (some information may be available by hard copy only)	5p per sheet 5p per sheet 5p per sheet 5p per sheet 5p per sheet
Policies and procedures for the provision of services and about the employment of staff: <ul style="list-style-type: none"> • Internal instructions to staff and policies relating to the delivery of services • Equality and diversity policy • Health and safety policy • Recruitment policies and details of current vacancies • Policies and procedures for handling requests for information • Complaints procedures (including those covering requests for information and operating the publication scheme) 	Hard copy Hard copy and website Hard copy and website Hard copy and website Hard copy and website Hard copy and website	5p per sheet 5p per sheet 5p per sheet 5p per sheet 5p per sheet 5p per sheet
Records management, personal data and access to information policies Include information security policies, records retention, destruction and archive policies,	Hard copy and website (some information may be available by hard copy only)	5p per sheet

and data protection (including data sharing and CCTV usage) policies		
Class 6 – Lists and Registers Currently maintained lists and registers only.	(hard copy or website; some information may only be available by inspection)	
Information legally required to hold in publicly available registers (in most circumstances existing access provisions will suffice)	Hard copy	
Assets register, including details of public land and building assets	Hard copy and website (some information may only be available by inspection)	5p per sheet
Disclosure log indicating the information provided in response to FOIA and EIR requests. These are recommended as good practice	Hard copy	5p per sheet
Register of members' interests	Hard copy and website	5p per sheet
Register of gifts and hospitality	Hard copy	5p per sheet
Class 7 – The services we offer (Information about the services we offer, including leaflets, guidance and newsletters produced for the public and businesses) Current information only	(hard copy or website; some information may only be available by inspection)	
Allotments	Hard copy and website from September 2026	5p per sheet
Burial grounds and closed churchyards	Hard copy and website	5p per sheet
Community centres and village halls	Hard copy and website	5p per sheet
Parks, playing fields and recreational facilities	Hard copy and website	5p per sheet
Seating, litter bins, clocks, memorials and lighting	Hard copy	5p per sheet
Bus shelters	Not held	5p per sheet
Markets	Not held	
Public conveniences	Hard copy and website	5p per sheet
Agency agreements	Hard copy	5p per sheet
Services for which we are entitled to recover a fee and details of those fees (eg burial fees)	Hard copy and website	5p per sheet

Additional Information		
Information not itemised in the lists above		

Schedule of charges

This describes how the charges have been arrived at and should be published as part of the guide.

TYPE OF CHARGE	DESCRIPTION	BASIS OF CHARGE
Disbursement cost	Photocopying @ 5p per sheet (black & white)	Actual cost of copying
	Photocopying @ 10p per sheet (colour)	Actual cost of copying
	Postage	Actual cost of Royal Mail standard 2 nd class
Statutory Fee		In accordance with the relevant legislation
Other	Requests for large amount of information may incur an additional charge of 5p per sheet	Time element of the copying

* the actual cost incurred

Town Clerk
Okehampton Town Council
Town Hall
Fore Street
Okehampton
EX20 1AA

01837 53179
townclerk@okehampton.gov.uk



Okehampton Town Council

Okehampton Town Council

DRAFT Privacy Notice

Our contact details

Name: Okehampton Town Council

Address: Town Hall, Fore Street, Okehampton EX20 1AA

Phone Number: 01837 53179

E-mail: townclerk@okehampton.gov.uk

The type of personal information we collect

We currently collect and process the following information:

Employees: Contact details, bank details, pension details, tax details, salary details, apprenticeships, annual leave, sick leave, DBS check, performance details, qualifications, employment history, disability details, eligibility to work in the UK, gender, date of birth, marital status, nationality, passport numbers, driving licence numbers, vehicle registration numbers, taxpayer identification numbers, staff identification numbers, tax reference codes, and national insurance numbers, insurance claims, next of kin, emergency contact information and car insurance details.

Councillors: register of interests, complaint information, DBS check, contact details, dates of birth

Car Parking Permits: Vehicle registration, contact details

Visitors book: Contact details, vehicle registration

Hallmaster: Contact details

Correspondence: Contact details

Electoral register: Addresses

Complaints: Contact details

Contractors: Contact details, bank details, insurance details

Cemetery: Contact details, bank details

Grant Award recipients: Contact details, bank details, insurance details, accounts

Body worn Camera: Images and sound

CCTV: Images

Invitations: contact details

Photos taken at events: Images

Newsletter: email address

Surveys and petitions: contact details

Accident and incident reports: Contact details

Volunteer Group: Contact details, medical information

Youth Council: Contact details, medical information, permissions for use of images

Mayors Chaplin: Contact details, religion

Minutes: Names, political opinions

Invoices: contact details, bank details

How we get your personal information and why we collect it

Most of the personal information we process is provided to us directly by you for one of the following reasons:

Payroll

Personnel File

Recruitment

Public accountability and transparency

Allowances and expenses

Legal and Regulatory obligations

Democratic functions

Security and access control

Facilities management

Public Interest

We also receive personal information indirectly, from the following sources in the following scenarios:

West Devon Borough Council- Electoral Register – used for confirming residency

Undertakers- Contact Detail, - for the use of a burial or headstone application

We use the information that you have given us in order to:

Employees: make a decision about recruitment or appointment, determining the terms on which you work for us, checking you are legally entitled to work in the UK, paying an employee, deducting tax and National Insurance contributions, providing any contractual benefits, liaising with the pension provider, administering the contract entered into, management, accounting and auditing, conducting performance reviews, managing performance and determining performance requirements, making decisions about salary reviews and compensation, assessing qualifications for a particular job or task, including decisions about promotions, conducting grievance or disciplinary proceedings, making decisions about continued employment or engagement, making arrangements for the termination of our working relationship, education, training and development requirements, dealing with legal disputes including accidents at work, ascertaining fitness to work, managing sickness absence, complying with health and safety obligations, to prevent fraud, to ensure network and information security, including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution, to conduct data analytics studies to review and better understand employee retention and attrition rates, equal opportunities monitoring, to undertake activity consistent with our statutory functions and powers including any delegated functions, to maintain our own accounts and records, to process a job application, to provide a reference.

Councillors: Be able to send council paperwork, transparency about interests and to be signatories on the council's bank account

Car Parking Permits: Issue parking permits for Simmons Park

Visitors book: Safety procedures in case of an evacuation

Hallmaster Bookings: To confirm who has hired the space.

Correspondence: Reply to correspondence received

Electoral Register: Confirm residency

Complaints: Reply to complaints received

Contractors: Payment of invoices, conformation of insurance and risk assessments.

Cemetery: Reservation details and details of purchased plots

Grant Award recipients: Transparency for qualifying for a grant and details of the bank account to be able to pay the grant.

Body Worn Camera: Safety of Parks Staff

CCTV: Safety and crime

Invitations: To reply to the invitation

Photos taken at events: Promotion of events

Newsletter: To be able to send the newsletter out

Surveys and petitions: To confirm multiple forms are not completed by the same person, or to confirm location of responder

Accident and incident reports: Insurance purposes

Volunteer Group: To be able to contact the group where they are meeting each week, and to confirm that they are not doing work that may exacerbate a medical condition.

Youth Council: To send details of meetings and events, to make sure that any refreshments provided do not cause a medical incident and to be able to publish their images.

Mayors Chaplin: To be able to contact to conduct events and which church they are affiliated with.

Minutes: Transparency

Invoices: Who the invoice is issued to/from and bank details for payment.

We may share this information with:

West Devon Borough Council

Devon County Council

Peninsula (Health and Safety Provider)

Devon and Cornwall Police

Former and prospective employers

DBS services suppliers

Recruitment Agencies

Professional advisors

Trade unions or employee representatives

Under the General Data Protection Regulation (GDPR), the lawful bases we rely on for processing this information are:

(a) Your consent. You are able to remove your consent at any time. You can do this by contacting Okehampton Town Council, Town Hall, Fore Street, Okehampton EX20 1AA.

(b) We have a contractual obligation.

(c) We have a legal obligation.

(d) We have a vital interest.

(e) We need it to perform a public task.

(f) We have a legitimate interest.

How we store your personal information

Your information is securely stored Okehampton Town Council, Town Hall, Fore Street, Okehampton EX20 1AA

We keep personal data in line with the Council's retention schedule and legislation and dispose of it in line with this. We will then dispose this information by deletion from the computer and paper copies are shredded.

Your data protection rights

Under data protection law, you have rights including:

Your right of access - You have the right to ask us for copies of your personal information.

Your right to rectification - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

Your right to erasure - You have the right to ask us to erase your personal information in certain circumstances.

Your right to restriction of processing - You have the right to ask us to restrict the processing of your personal information in certain circumstances.

Your right to object to processing - You have the the right to object to the processing of your personal information in certain circumstances.

Your right to data portability - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

Please contact us at townclerk@okehampton.gov.uk 01837 53179 or Town Hall, Fore Street, Okehampton EX20 1AA if you wish to make a request.

How to complain

If you have any concerns about our use of your personal information, you can make a complaint to us at Okehampton Town Council, Town Hall, Fore Street, Okehampton EX20 1AA

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>



Okehampton Town Council

Okehampton Town Council

Draft Reserves (Financial) Policy

Introduction

Okehampton Town Council is required to maintain adequate financial reserves to meet the needs of the organisation. The purpose of this policy is to set out how the Council will determine and review the level of reserves it holds.

Types of Reserves

Okehampton Town Council maintains two types of reserves:

Earmarked Reserves

This provides a means of accumulating or specifying funds, for use in a later financial year, to meet known or planned initiatives. The purpose of an Earmarked Reserve is to set aside amounts for projects that extend beyond one year or as a contingency against a specific situation occurring.

Earmarked Reserves will increase through resolutions of the Council and will decrease as they are spent on their specific intended purposes.

Where expenditure is planned in future accounting periods, it is prudent to build up reserves in advance. When an Earmarked Reserve is established, a clear reason/purpose should be set out. It is the responsibility of the Responsible Finance Officer (RFO) to ensure funds are spent in line with their purpose. The purpose of each Earmarked Reserve should be reviewed annually to ensure that it is still relevant.

There is no limit on the amount of Earmarked Reserves that can be held except that the reason must be for genuine intended purposes.

General Reserves

This represents the unallocated balance of Council funds.

The main purposes of the General Reserves are firstly to operate as a working balance to help manage the impact of uneven cash flow and secondly, to provide a contingency to cushion the impact of emerging or unforeseen events or genuine emergencies, a good example of this being the COVID-19 Pandemic. In general, a robust level of reserve should be maintained and take account of operational and financial issues facing the Town Council.

A well-run authority with a prudent approach to setting its budget will each year consider its level of General Reserves. These General Reserves will also need to be supported by Earmarked Reserves for specific needs, contingencies and commitments. In assessing the level of the Town Council's reserves, account needs to be taken of the risks facing the Council in terms of any significant unforeseen expenditure requirements.

The primary means of building a General Reserve will be through the reallocation of funds e.g. where a project comes in under budget or through an allocation from the annual budget.

It is recommended in the NALC 'Accountability and Governance Practitioners' Guide' to hold between 3 and 12 months expenditure¹ as a General Reserve. However, if the general reserve is too high the level will need to be justified to the external auditor.

The level of the General Reserve should be reviewed each year as part of the budgeting process. Balancing the annual budget by drawing on reserves must be viewed as a legitimate short-term option only. Such reserves must not be deployed to finance recurrent expenditure.

Budget Assumptions and Risk

When budgeting and reviewing reserve requirements the council must make assumptions and assess possible identifiable risks which include the following:

- The level of inflation and interest rates
- Salary and benefit reviews negotiated by the National Joint Council for Local Government Services
- Loss of staff
- The level and timing of revenue and capital receipts
- Planned efficiency savings/gains
- Financial risks inherent in any new project
- Legislation changes
- One-off events
- Demand led pressures
- Uninsurable losses
- Availability of other funding sources e.g. grants
- Potential capping of Town Council precept by central government

The Council undertakes an annual Financial Risk Assessment and has insurance in place to protect against possible identifiable insurable losses.

Review of Reserves

Annually as part of the budget and precept setting process, Okehampton Town Council will review both its Earmarked and General Reserves. This review will include:

- The ongoing requirement for each of the Earmarked Reserves and the allocated amount set aside
- The level of General Reserves it will aim to hold in the upcoming financial year
- The potential risks including from loss of significant self-generated income

For the 2025/26 financial year Okehampton Town Council will aim to hold the equivalent of four months precept as a General Reserve, plus the budgeted income of £80,000 from Waitrose Carpark which the Council considers to be significant self-generated income which would post a significant risk if lost.

¹ Net Revenue Expenditure – effectively the Precept



Okehampton Town Council

Okehampton Town Council

Subject Access Request (SAR) Policy

Draft

In order to comply with the requirements of the General Data Protection Regulations (GDPR), Data Subjects have the right to access personal data held on them by the Council. Details are set out in the Privacy Notice on the Council's website.

This policy is in place to ensure that internal procedures on handling of SARs are accurate and complied with and includes:

- 1) Responsibilities (who, what)
- 2) Timing
- 3) Changes to data
- 4) Handling requests for rectification, erasure, or restriction of processing.

The Council will ensure that personal data is easily accessible at all times in order to ensure a timely response to SARs and that personal data on specific data subjects can be easily filtered.

The Council has implemented standards on responding to SARs.

1. Upon receipt of a SAR

- a. The data subject will be informed who at the Council to contact, this should be the Data Controller, who is the Town Council, this policy delegates authority to the Town Clerk to be the contact for the receipt and dealing of SARs.
- b. The identity of the data subject will be verified and if needed, any further evidence on the identity of the data subject may be requested.
- c. The access request will be verified; is it sufficiently substantiated? Is it clear to the data controller what personal data is requested? If not, additional information will be requested.
- d. Requests will be verified as to them being unfounded or excessive (in particular because of their repetitive character); if so, the Council may refuse to act on the request or charge a reasonable fee.
- e. Receipt of the SAR will be promptly acknowledged, and the data subject will be informed of any costs involved in the processing of the SAR.
- f. Whether the Council processes the data requested will be verified. If the Council does not process any data, the data subject will be informed accordingly. At all times, the internal SAR procedure will be followed, and progress may be monitored.
- g. Data will not be changed as a result of the SAR. Routine changes as part of the processing activities concerned may be permitted.
- h. The data requested will be verified to establish if it involves data on other data subjects. This data will be filtered before the requested data is supplied to the data subject; if data cannot be filtered, other data subjects will be contacted to give consent to the supply of their data as part of the SAR.

2.Responding to a SAR

- a. The Council will respond to a SAR within one calendar month after receipt of the request:
 1. If more time is needed to respond to complex requests, an extension of another two months is permissible, and this will be communicated to the data subject in a timely manner within the first month.
 2. If the Council cannot provide the information requested, it will inform the data subject on this decision without delay and at the latest within one month of receipt of the request.
- b. If a SAR is submitted in electronic form, any personal data will be preferably provided by electronic means as well.
- c. If data on the data subject is processed, the Council will ensure as a minimum the following information in the SAR response:
 1. The purposes of the processing.
 2. The categories of personal data concerned.
 3. The recipients or categories of recipients to whom personal data has been or will be disclosed, in particular in third countries or international organisations, including any appropriate safeguards for transfer of data, such as Binding Corporate Rules or EU model clauses.
 4. Where possible, the envisaged period for which personal data will be stored, or, if not possible, the criteria used to determine that period.
 5. The existence of the right to request rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing.
 6. The right to lodge a complaint with the Information Commissioners Office ("ICO").
 7. If the data has not been collected from the data subject: the source of such data.
 8. The existence of any automated decision-making, including profiling and any meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.
- d. Provide a copy of the personal data undergoing processing.

Implementing the Subject Access Requests Policy – Checklist on what MUST be done

On receipt of a subject access request, it must be forwarded immediately to the Town Clerk, who will identify whether a request has been made under the Data Protection legislation

1. A member of staff, and as appropriate, Councillor, who receives a request to locate and supply personal data relating to a SAR must make a full exhaustive search of the records to which they have access.
2. All the personal data that has been requested must be provided unless an exemption applies. (This will involve a search of emails/recoverable emails, word documents, spreadsheets, databases, systems, removable media (for example, memory sticks, floppy disks, CDs), tape recordings, paper records in relevant filing systems.)
3. A response must be provided within one calendar month after accepting the request as valid.
4. Subject Access Requests must be undertaken free of charge to the requestor unless the legislation permits reasonable fees to be charged.
5. Councillors and the Town Clerk must ensure that they are aware of and follow this guidance.
6. The Council must provide where necessary an explanation with the personal data in an "intelligible form", which will include giving an explanation of any codes, acronyms

and complex terms. The personal data will be supplied in a permanent form except where the requestor agrees or where it is impossible or would involve undue effort. Agreement may be sought with the requestor that they will view the personal data on screen or inspect files on Council premises. Any exempt personal data will be redacted from the released documents with explanation why that personal data is being withheld.

7. The Council must ensure a request has been received in writing where a data subject is asking for sufficiently well-defined personal data held by the council relating to the data subject. What personal data is needed will be clarified with the requestor, who may be asked to supply their address and valid evidence to prove their identity. The Council accepts the following forms of identification

- Current UK/EEA Passport
- UK Photocard Driving Licence (Full or Provisional)
- Firearms Licence / Shotgun Certificate
- EEA National Identity Card
- Full UK Paper Driving Licence
- State Benefits Entitlement Document*
- State Pension Entitlement Document*
- HMRC Tax Credit Document*
- Local Authority Benefit Document*
- State/Local Authority Educational Grant Document*
- HMRC Tax Notification Document
- Disabled Driver's Pass
- Financial Statement issued by bank, building society or credit card company+
- Judiciary Document such as a Notice of Hearing, Summons or Court Order
- Utility bill for supply of gas, electric, water or telephone landline+
- Most recent Mortgage Statement
- Most recent council Tax Bill/Demand or Statement
- Tenancy Agreement
- Building Society Passbook which shows a transaction in the last 3 months and your address

(* These documents must be dated in the past 12 months, +These documents must be dated in the past 3 months):

8. Where a requestor is not satisfied with a response to a SAR, the council must manage this as a complaint under the Council's Complaints Policy. The Council must advise the requestor that they may complain to the Information Commissioners Office ("ICO") if they remain unhappy with the outcome.

Reporting to the Data Controller (The Council)

The Data Controller is responsible for responding to a SAR under GDPR. This policy delegates authority to the Town Clerk to deal with SAR's on behalf of the Data Controller. The Town Clerk will report to the Data Controller any SARs received and provide details of compliance against the statutory timescales.

3. Asking for copies of your data

You have the right to ask for copies of your personal data we store and use. This is your right of access, also known as making a subject access request or SAR. We will normally respond at the latest within one calendar month of receiving your request. There may be

times where we need longer, or we may need to charge a reasonable fee for admin costs. We will let you know if this is the case.

You don't have to use this form to ask for copies of your data but it's helpful for us to know what you are looking for so we can respond fully and promptly.

Please send your completed form to us using the contact details at the bottom of the page. You can read more about your right of access by visiting: <https://ico.org.uk/your-data-matters/your-right-to-get-copies-of-your-data/>

1. Who's making this request?

We are asking for your contact details so we can send your response and discuss your request with you (if needed). You only need to give us the relevant details. For example, you only need to give us your postal address if you would like us to respond by post or if you think it would help us identify you. We may ask you for proof of ID if we feel it's reasonable and proportionate. The timescale for responding to your request will start when we receive this.

Your name:

Contact Number:

Email address:

Postal address:

Are you making this request on behalf of someone else?

Yes

No (please move onto section three)

2. Please provide contact details of the person you are making the request for.

If you are making the request on behalf of someone else, we need to know who they are and their contact details in case we need to get in touch.

Name of the other person:

Contact Number:

Email address:

Postal address:

Other contact information for the person you are making the request for.

You also need to give us proof of your authority to act on their behalf. For example, this could be written authorisation from them or a relevant power of attorney.

Please send proof of authority together with this form when you make your request.

Yes I've got proof of my authority to act on someone else's behalf, and I'll include it with my form. (Please move to section four.)

No I haven't got any proof of authority yet but will send it at a later date. I understand you can't action my request until you receive this information

3. How would you like us to respond to you?

We'll try and respond to you in the way that suits you. Please let us know if you need us to make any adjustments for you e.g. large font.

☐ Email ☐ Post ☐ Other (please specify)

4. What personal data are you requesting?

If you know exactly what personal data you're looking for, it's helpful if you let us know. For example, if you need a specific email, we could search for this using a particular word or phrase.

Briefly describe your request

5. Is there a date range of the personal data you're asking for? It's helpful if you're as specific as possible about your request.

Date from:

Date to:

6. Can you tell us anything else to help us with our search?

If there's anything else of relevance you can tell us to help us identify you or the data you're requesting, please include this here.

Thank you. We'll be in touch. If you'd like more information about how we use your data, have a look at our privacy notice.

Okehampton Town Council
Town Hall
Fore Street
Okehampton
EX20 1AA
01837 53179
www.okehampton.gov.uk
townclerk@okehampton.gov.uk

Okehampton Youth Council

DRAFT Code of Conduct



- You should respect and listen to the views of others, challenge discrimination, and promote equal opportunities.
- During discussions, you should remain calm and collected.
- You should choose words carefully and speak without explicit language.
- As representatives, your duties are to represent the views of young people.
- Every young person aged 10-18 has the right to have their view heard and listened to by OYC.
- Identify, discuss, and debate issues of concern to young people - by responding to plans, consultations, letters, emails or other forms of correspondence, and fully taking part in meetings.
- Attend OYC meetings regularly and on time.
- Mobile phones should be away and on silent during meetings.
- It is important to take your role seriously – this includes replying to correspondence promptly.
- At all times act and communicate in a way that upholds the reputation of OYC.
- All Youth Councillors should familiarise themselves with the agenda and supporting papers prior to the meeting.

Any form of discrimination, harassment or poor behaviour towards any person including OYC Councillors or those representing OTC will not be tolerated and the title of Youth Councillor may be revoked at the discretion of OTC Officers.

Okehampton Youth Council

DRAFT Constitution



1. Introduction

Okehampton Town Youth Council (OYC) has been set up to give our youths a voice, a connection to their town and to each other, with a view to creating their legacy within our community.

Youth Councillors will represent the views and opinions of their generation whilst influencing and inspiring change and introducing them to democracy.

OYC will work alongside Okehampton Town Council (OTC).

2. Aims and Objectives

- a) To assist OTC by identifying issues affecting young people and providing recommendations for possible solutions or action that could be taken.
- b) To respond to enquiries from OTC on specific young people related issues.
- c) To encourage and engage the younger generation to get involved in projects and events in Okehampton.
- d) To work with other organisations in the town to help promote the views of young people and to make other services aware of young people's views and needs.
- e) To encourage a sense of community and pride amongst the younger generation in the facilities and services available within their community.
- f) To represent the views of younger residents.
- g) To work as a team in both decision making and actions arising.
- h) To create opportunities for leaning.
- i) To promote the importance of a youth voice and the influence this can have on wider decision making.
- j) To make democracy and local government accessible to everyone.

3. Membership

The membership and structure of OYC will, as far as possible, mirror that of Okehampton Town Council.

- a) There will be 14 Councillor seats on the Youth Council.

- b) Eligibility is open to all young people between the ages of 10 and 18 **and** who live, work or attend an educational facility within the Okehampton Town Boundary. The boundary includes the area to the east of Okehampton that will become part of the town boundary as approved by West Devon Borough Council following the Community Governance Boundary Review.

4. Meetings

- a) OYC will meet at least 4 times per year in the Council Chamber or location as agreed.
- b) Meetings will not be filmed or recorded and will not be open to members of the public with the exception of parents or carers of Youth Councillors.
- c) At least two adults representing OTC will be present at meetings or activities of OYC, as observers/responsible adults and to advise and can participate if requested to do so by the OYC. Other young adult members of the community linked to community groups such as Room 13 may also be present as agreed by OYC.
- d) Minutes will be taken and distributed before the next meeting for approval at that meeting.

5. Youth Councillor Duties

- a) Attend meetings and to send apologies if they are unable to attend.
- b) Work together with other members.
- c) Treat each other and all other people with civility and respect.
- d) Assist with the formation of groups if needed, support activities and events that may be arranged by OYC.
- e) Raise awareness of issues affecting young people
- f) Assist with events, projects and issues affecting or arranged by OTC, including community engagement.
- g) OYC will present its public image under the guidance of OTC.

6. Okehampton Town Council Support

- a) Provide meeting facilities and refreshments.
- b) Provide administrative support.
- c) May provide the OYC with a budget to support activities.
- d) A nominated Town Councillor will regularly liaise with the OYC and attend its meetings.
- e) Recommendations from the OYC will be considered by the Full Council or the appropriate committee.

Okehampton Youth Council

DRAFT - Data Protection Policy



Okehampton Youth Council (OYC) recognises its responsibility to comply with the 2018 General Data Protection Regulations. The General Data Protection Regulations (GDPR) retains the existing legal principles of the 1998 Data Protection Act and adds some additional protections as to how personal data and sensitive personal data can be used.

The Data Protection Act

The Data Protection Act 1998 set out high standards for the handling of personal information and protecting individuals' rights for privacy. It also regulated how information can be collected, handled and used. The Data Protection Act applies to anyone holding information about people electronically or on paper.

The General Data Protection Regulations 2018

The Regulations say that the information provided to people about how we process their personal data must be:

- concise,
- transparent,
- intelligible and easily accessible,
- written in clear and plain language, particularly if addressed to a child, and
- available free of charge.

OYC has procedures in place to ensure that it complies with the General Data Protection Regulations 2018 when holding personal information.

When dealing with personal data, OYC and OTC staff must ensure that:

- **IT IS PROCESSED FAIRLY AND LAWFULLY** - This means that information should only be collected from individuals if staff have been open and honest about why they want the information.
- **IT IS PROCESSED FOR SPECIFIED PURPOSES ONLY**
- **IT IS RELEVANT TO WHAT IT IS NEEDED FOR** - Data will be monitored so that too much or too little is not kept; only data that is needed should be held.
- **IT IS ACCURATE AND KEPT UP TO DATE** - Personal data should be accurate, if it is not it should be corrected.
- **IT IS NOT KEPT LONGER THAN IT IS NEEDED**
- **IT IS PROCESSED IN ACCORDANCE WITH THE RIGHTS OF INDIVIDUALS** - This means that individuals must be informed, upon request, of all the information held about them.
- **IT IS KEPT SECURELY** - This means that only staff can access the data, it should be stored securely so it cannot be accessed by members of the public.

Collecting Data

OYC and OTC recognise its responsibility to be open with people when taking personal details from them. This means that staff must be honest about why they want a particular piece of information. If, for example, a member of the public gives their phone number to staff or a member of OYC, this will only be used for the purpose it has been given and will not be disclosed to anyone else.

Storing and Accessing Data

OYC and OTC may hold information about individuals such as their addresses and telephone numbers. These are kept in a secure location at the Town Council offices and are not available for the public to access. All data stored on a computer is password protected. Once data is not needed anymore, if it is out of date or has served its use, it will be shredded or deleted from the computer.

OYC is aware that people have the right to access any information that is held about them. If a person requests to see any data that is being held about them:

- They must be sent all of the information that is being held about them
- There must be explanation for why it has been stored
- There must be a list of who has seen it
- It must be sent within one month
- Requests that are manifestly unfounded or excessive may be refused or a charge made
- If a request is refused, a reason must be given.
- If an individual requests that their data is rectified or erased, this will be carried out.

Disclosure of Information

If a third party needs to access information to help carry out their duties, this may be acceptable. They are only able to access as much information as necessary and it should only be used for that specific purpose. If for instance there is a safeguarding incident that requires investigation, a third party may access an address and telephone number of the person who has made the complaint so they can help with the enquiry. However, before they access any sensitive information about a person, they would need consent to do this from the Youth Council's responsible person. Data should never be used for political reasons unless the data subjects have consented.

Confidentiality

OYC and OTC staff must be aware that when complaints or queries are made, they must remain confidential unless the subject gives permission otherwise. When handling personal data, this must also remain confidential. If a data breach is identified the Information Commissioners Office (ICO) must be informed within 72 hours and an investigation will be conducted.

Your Right to Lodge a Complaint with the ICO

You can contact the ICO on 0303 123 1113 or at the ICO office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

Contact Details

Please contact us if you have any questions about this Privacy Notice or the personal data we hold about you or to exercise all relevant rights, queries or complaints at:

Town Clerk, Okehampton Town Council, Town Hall, Fore Street, Okehampton EX20 1AA
01837 53179 townclerk@okehampton.gov.uk

Okehampton Youth Council

DRAFT Equal Opportunities Policy



Policy Statement

Membership of Okehampton Youth Council (OYC) is open to any young people between the ages of 10 and 18 who live, work or attend school or college within the town boundary regardless of ethnicity, sexual orientation, religion or ability. (The boundary includes the area to the east of the town that will become part of the Town as approved by West Devon Borough Council following the Community Governance Boundary Review.)

OYC is committed to encouraging equality, diversity and inclusion among the group, and to eliminating unlawful discrimination.

The aim is for our group to be truly representative of all sections of society and for each member to feel respected and able to give their best.

OYC, in providing goods and/or services and/or facilities, is also committed against unlawful discrimination of the public, or other organisations.

The purpose of the policy is to:

Provide equality, fairness and respect for all members of the group, and to not unlawfully discriminate – in line with the Equality Act 2010, on the grounds of any protected characteristics - namely age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race (including colour, nationality, and ethnic or national origin), religion or belief, sex and sexual orientation.

Oppose and avoid all forms of unlawful discrimination. This includes in benefits, terms and conditions of volunteering, dealing with grievances and discipline, or on any other grounds.

Meetings and Events

- OYC meetings are held in accessible venues, with disabled access, nearby parking and some transport links.
- OYC events will be advertised in variety of ways to ensure that young people know about them, including email, posters, social media and word of mouth.
- Information will be circulated to a wide range of young people, including the Multicultural Network Devon Network, Special Schools, Disability Groups, LGBTQ+ Groups.
- OYC will not tolerate any form of abusive language or bullying and will take active steps to promote positive interactions amongst all young people.

Recruiting Youth Councillors and Young People to attend events

- OYC publicity will reflect a wide range of young people from various backgrounds and abilities.
- OYC members will be offered regular training around peer mediation, victim support and equality issues.
- OYC members and adults will actively challenge any incident of bullying, name calling, harassment and report any incident witnessed to the appropriate authority.

Code of Conduct

- All people will be treated with dignity and respect regardless of age, disability, gender reassignment, race, religion or belief, sex and sexual orientation, and will be free from harassment, abuse or intimidation on any of these issues.
- At all times people's feelings will be valued and respected. Language or humour that people may find offensive will not be used, including for example, racist, sexist or homophobic jokes or language which is derogatory.
- Any incidents breaking the above conditions will be taken seriously and if they cannot be resolved by way of an acceptable apology and written undertaking that such an offence will not be repeated, then the following action will be taken:
 - (i) The member will be suspended from OYC until such time as the Council feels the victim has received support and will not feel further threatened, and the incident will not be repeated. This could mean permanent exclusion from membership.
 - (ii) Should the victim of the incident request it, the offending member may be reported to the appropriate authority.

Supporting Agencies for Assistance and Advice on Reporting

- Town Clerk
Okehampton Town Council
Town Hall
Okehampton EX20 1AA

01837 53179
townclerk@okehampton.gov.uk
- Devon and Cornwall Police
call 101 – or 112/999 in an emergency.
- Plymouth and Devon Race Equality Council – 01752 224555

Okehampton Youth Council

DRAFT Safeguarding Policy



Policy Statement

As an organisation that has contact with children, Okehampton Town Youth Council (OTYC) has a duty of care to them.

As a minimum, this duty of care includes:

- Safeguarding and promoting the interests and well-being of the children with whom it works.
- Reducing the vulnerability of children by upholding the law, professional attitudes and practices.
- Making sound decisions by assessing the individual's emotional, physical, intellectual and mental capacity in relation to self-determination and consent, in order to take all reasonable steps to protect the person from harm, abuse and exploitation.

Introduction

OTYC makes a positive contribution to a strong and safe community and recognises the right of every individual to be safe and secure. We will ensure that our activities are safe for our staff, volunteers and young people. Unfortunately, people may pose a risk to children, and may wish to harm or abuse them.

Accidents can happen unless steps are taken to minimise the risk. Therefore, safeguarding children is everybody's business. There are various laws that protect individuals from harm or abuse including the Human Rights Act 1998, Childrens Act 1989 and 2004 and the Children and Social Work Act 2027.

OTYC has put in place safeguards to protect those who work and volunteer for us.

OTYC has also put in place safeguards to avoid putting their workers and volunteers in positions where harm or abuse might be alleged, and to ensure that all workers and volunteers know exactly what to do should harm or abuse be suspected.

OTYC believes it is important to not only protect the vulnerable from harm and abuse but to actively promote the welfare of children - not just to protect, but to safeguard. Therefore, we also have a responsibility to take action if we know, or suspect, that a child or young person is at risk of harm or abuse. OTYC recognises that some children are additionally vulnerable because of the impact of discrimination, previous experiences, their level of dependency, communication needs or other issues.

Adults working with OTYC

- All adults who work regularly with OTYC will be asked to undertake an Enhanced Disclosure and Barring (DBS) check and complete a registration process in order that we have their names and addresses on file and confirmed.
- All adult helpers will read and sign to say they will adhere to this policy.
- No adult helper of the OTYC should be alone with any member of OTYC while undertaking Council business (other than family members).
- Safeguarding training will reviewed and updated where needed during the first year for all adult helpers.
- Adults working with OTYC will be made aware that abuse can occur at all levels of society and in all family types.
- All adults working with OTYC will be made aware of this Safeguarding Policy and will be informed about the different forms of abuse covered by the Devon Safeguarding Children Partnership - namely physical abuse, emotional abuse, sexual abuse and neglect.

Recognising and reporting Abuse – Adult Helpers

If a child is considered to be in immediate danger, the adult should call 999.

If an adult helper suspects a child may be in need of safeguarding, they will notify the Town Clerk who is the Nominated Safeguarding Officer (NSO) for OTC, and to the Children Services duty line (contact details at appendix 1).

All concerns should be submitted by telephone if deemed urgent and followed by a written incident report (see appendix 2).

Recognition of abuse and advice on responding to allegations can be found in appendix 3.

PROCEDURE IF YOU SUSPECT ABUSE OR AN ALLEGATION IS MADE

This may arise in a number of different ways:

- When a young person tells you something has happened
- An adult or young person tells you about their concerns for another young person
- You observe unexplained injury, or changes in behaviour, which cause you concern
- You receive an allegation about any adult or about yourself

If a young person tells you about abuse, it is because they see you as a 'safe' person.

- Listen carefully to what the young person is saying
- Show you take them seriously and thank them for telling you
- Avoid asking the child to repeat the information
- Explain that you cannot keep what the young person tells you a secret
- Reassure the young person that they have done the right thing
- Make no judgement about what you have heard and stay calm
- Follow the procedure below

If you suspect abuse, a young person confides in you, or a complaint is made about any adult or about yourself, it is your duty to report the concern.

At any point if you believe the child is in immediate danger or requires medical attention, call the police and/or an ambulance on 999.

If a young person tells you about abuse by someone else, DO:

- Allow the young person to speak without interruption, accepting what is said.
- Thank the young person for telling you.
- Offer immediate understanding and reassurance, while passing no judgement.
- Advise that you will try to offer support but that you have a duty to report to your line manager (inform parent/carer unless it would increase risk of harm)
- Explain to the young person what will happen next and keep them up to date.
- Immediately, and within the same working day, discuss the incident with the Nominated Safeguarding Officer (NSO): Town Clerk
- Fill out a Record of Concern form, using the young person's actual words wherever possible.
- Sign, date and pass your Record of Concern directly to the NSO.

DO NOT:

- Interrogate or ask leading questions.
- Make promises you can't keep.
- Interrupt or change the subject.
- Cast doubt on what the child has said.
- Make the child feel responsible for what has happened.
- Fail to act.

If you have a concern about a young person's safety and well-being:

- Immediately tell the Nominated Safeguarding Officer (NSO)
- Fill out a Record of Concern, detailing what you witnessed, heard or were told
- Sign, date and pass your Record of Concern directly to the NSO

If you receive a complaint or allegation about any person, including yourself:

- Immediately tell the Nominated Safeguarding Officer (NSO)
- Write careful notes of what you witnessed, heard or were told.
- Sign, date and pass your notes directly to the NSO.
- Try to ensure no-one is placed in a position which could cause further compromise.

On all occasions:

- You must refer; you must not investigate.
- If the Nominated Safeguarding Officer is suspected of involvement pass information instead to the Assistant Clerk or directly to Social Services.
- Where appropriate (if safe to do so), the child or young person's parents/carers must be informed, and notes made accessible to them.
- Reports of concerns must be followed up
- Remember that abuse can be carried out by an adult OR a young person.

Safety Issues

- Members of the committee under the age of 18 will only attend meetings, conferences, events etc with the explicit consent of their parent/guardian.
- All vehicles used by OTYC for direct activities/business will be insured for business use and have current valid MOT's. All drivers will have driving documents i.e. License insurance and MOT checked, photocopied and kept on file
- Seatbelts will be used at all times.
- Any journeys, events etc will be risk assessed by an adult prior to the event.
- Specific risk assessments will be carried out for all activities undertaken by OTYC and 3rd parties conducting activities on behalf of OTYC will also be required to show evidence of having their own risk assessments and other relevant procedures in place.
- Public Liability Cover is held by the OTC.

COMPLAINTS PROCEDURE

- Any volunteer, staff member or young person has the right to report a complaint about another in confidence and free from harassment.
- In the first instance, complaints should be made in writing to the Town Clerk, Okehampton Town Council, Town Hall, Fore Street, Okehampton EX20 1AA or if verbally, with another person present.
- Where possible a complaint should be dealt with quickly and involving as few people as are necessary. If the complaint remained unresolved, it should be referred to the Okehampton Town Council Mayor or Chairman of the Policy & Resources Committee, details of whom can be found on OTC's website.

WHISTLEBLOWING

OTYC is dedicated to the highest standards of operation, probity and accountability.

In line with this commitment, employees, volunteers and others with serious concerns about any aspect of the groups work are encouraged to come forward and voice those concerns.

In the first instance if you have safeguarding concerns or want to complain about a lack of action on a safeguarding concern, speak to the NSO.

However, if you have continuing concerns, e.g. your concerns are not acted on, you are encouraged to contact the appropriate authorities (the local safeguarding boards and/or Police).

Advice is available from Protect - free confidential advice for people who witnessed wrongdoing in their workplace but are not sure how to raise their concerns (<https://protect-advice.org.uk> 020 3117 2520) and NSPCC National Whistleblowing Advice Line on 0800 028 0285.

Appendix 1**USEFUL CONTACTS**

Local Contacts		
Town Clerk (NSO)	Okehampton Town Council Town Hall Fore Street Okehampton EX20 1AA townclerk@okehampton.gov.uk www.okehampton.gov.uk	01837 53179
Devon Safeguarding Children Partnership	www.devonscp.org.uk/	01392 386067
Children's Social Care, Devon County Council (Okehampton area is covered from Tiverton office)	Monday – Thursday 9am-4pm Friday 9am-4pm Out of Hours Emergency Duty Service	01392 383000 0345 6000388
Devon and Cornwall Police	Okehampton Police Station Barton Road Okehampton EX20 1NW	Tel: 101 (in an emergency contact via 112/999)
NSPCC	Help for adults concerned about a child.	0808 800 5000 Text: 88858
Childline	Help for children and young people.	0800 1111

Safeguarding Policy - Incident Report Form**Please complete as fully as possible:**

Date of incident/concern raised

Venue/location

Time of disclosure/incident/concern

Name of person at risk

Gender identity

Date of birth

Address

.....

.....

Postcode.....

Telephone number.....

Next of kin.....

Address (if different from above).....

.....

.....

Postcode.....

Telephone number (if different from above)

Person expressing concern.....

Address

.....

.....

Postcode.....

Telephone number.....

Nature of concern
.....
.....
.....

What has prompted the concerns (physical, behavioural, other)
.....
.....
.....

Has the person at risk been spoken to?
.....

Who by?
.....

What was said to the adult at risk and what did the adult at risk say? (add more detail at the end if necessary and include as much information as possible)

.....
.....
.....
.....
.....
.....
.....

Is there an alleged abuser/s?
.....

Who is this?
.....

Has this person been approached?

.....

Has anyone else been approached?

.....

Has anyone else been consulted?

.....

Has the incident been reported to appropriate Safeguarding Services?

.....

Name of reporting person?

Signature

Date.....

Recognition of Abuse

The 4 main areas of abuse are:

- *Physical Abuse*: Action will be taken under this heading if the adult has reason to believe that there has been a physical injury to a child or young person, including deliberate poisoning, where there is a definite knowledge or reasonable suspicion that the injury was inflicted knowingly, or knowingly not prevented.
- *Sexual Abuse*: Action will be taken under this heading if the adult has reason to believe that there has been inappropriate sexual activity or sexual grooming.
- *Emotional Abuse*: Action will be taken under this heading if the adult has reason to believe that there has been a severe adverse effect on the behaviour and emotional development of a child or young person caused by persistent or severe ill treatment or rejection.
- *Neglect*: Action will be taken under this heading if the adult has reason to believe that there has been persistent or severe neglect of a child or young person which could have resulted in serious impairment of the child or young persons health and development
- *Bullying*: Any member found bullying will be asked to resign from the committee

Indicators of Physical Abuse

Physical Observations

- Bruising – especially bruising on the trunk/ bruises on the face, upper arm, shoulders and neck, consistent with gripping/finger-tip bruising/finger marks
- Burns and scalds – especially cigarette burns/burns caused by lengthy exposure to heat
- Human bite marks
- Fractures, particularly spiral fractures
- Swelling and lack of normal use of limbs
- Any serious injury with no explanation or conflicting explanations/inconsistent accounts
- Untreated injuries

Behavioural Observations

- Unusually fearful with adults
- Unnaturally compliant to parents
- Refusal to discuss injuries/fear of medical help
- Withdrawal from physical contact
- Aggression towards others
- Wears cover-up clothing
- Any behaviour that you would not expect to see in a child, at their age or stage in development.

Indicators of Sexual Abuse

Physical Observations

- Damage to genitalia, anus or mouth
- Sexually transmitted disease
- Unexpected pregnancy especially in young girls
- Soreness in genital area, anus or mouth
- Unexplained recurrent urinary tract infections and discharges or abdominal pain.

Behavioral Observations

- Sexual knowledge inappropriate for age
- Sexualized behaviour in young children
- Sexually provocative behaviour/promiscuity
- Hinting at sexual activity
- Inexplicable falling off in school performance
- Sudden apparent changes in personality
- Lack of concentration, restlessness, aimlessness
- Socially withdrawn
- Overly compliant behaviour
- Acting out, aggressive behaviour
- Poor trust in significant adults
- Regressive behaviour, onset of wetting, by day or night
- Onset of insecure, clinging behaviour
- Arriving early, leaving late, running away from home
- Suicide attempts, self-mutilation, self-disgust
- Eating disorders, hysteria attacks in adolescents
- Any behaviour that will adversely affect a child's development

Indicators of Emotional Abuse

- Physical, mental and emotional developmental lags
- Acceptance of punishment that appears excessive
- Over-reaction to mistakes
- Continual self-deprecation
- Sudden speech disorders
- Fear of new situations
- Inappropriate emotional responses to painful situations
- Neurotic behaviour (such as rocking, hair twisting, thumb-sucking)
- Self-mutilation
- Fear of parents being contacted
- Extremes of passivity or aggression
- Drug/solvent abuse
- Running away
- Compulsive stealing, scavenging.

Indicators of Neglect

Physical Observations

- Poor personal hygiene
- Poor state of clothing
- Emaciation, pot belly, short stature
- Poor skin tone and hair tone
- Untreated medical problems

Behavioral Observations

- Constant hunger
- Constant tiredness
- Frequent lateness or non-attendance at school or OTYC meeting
- Destructive tendencies
- Low self-esteem
- Neurotic behaviour
- No social relationships
- Running away
- Compulsive stealing or scavenging

