



MINEHEAD TOWN COUNCIL PUBLIC INTEREST REPORT ACTION PLAN

Created By: Ben Parker

Date: June 2025

Review Date: Ongoing

Approved by Council: Tuesday 1st July 2025

| Recommendation: Seeks independent advice before agreeing to make payments to a member of the Council, directly addressing the legal basis on which such payments may be made | | | | | | |
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| Action | How? | Progress | Evidenced by | Action Owner | Comment(s) | Date Completed |
| Implement a process where any proposed payment not covered by existing policy is documented and reviewed by the internal auditor before approval. | Create an Exceptions Policy triggering internal auditor review and legal consultation for all non-standard payments | To begin | NA | Risk, Policy & Procedures Advisory Group. Town Clerk | Not addressed in current policy – separate policy required and legal advice must be attached to proposal | Autumn 2025 (anticipated) |
| Establish a policy prohibiting any contractual or paid work arrangements between Council members and | Adopt Honorary Bonus, Expenses and Temporary Responsibility Allowance (TRA) Payments Policy | Draft Template in place (pending adoption) | Draft Honorary Bonus, Expenses and Temporary | Risk, Policy & Procedures Advisory Group. Town Clerk | Policy clarifies no honoraria or TRA payments may be made to councillors. Will be presented to council for adoption July 2025 | July 2025 (anticipated) |

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| the Council, in compliance with UK regulations. | containing an explicit prohibition. | | Responsibility Allowance (TRA) Payments Policy, page. 2 | | | |
| Ensure payments to Council members are only for allowable expenses. | Cross-reference Expenses Policy and Honorary Policy. | Completed | Expenses Policy pages. 3–4; Draft Honorary Bonus, Expenses and Temporary Responsibility Allowance (TRA) Payments Policy page. 2 | Council | Jointly confirms compliance with 2003 Regulations. | May 2025 Full Council |
| Implement a process for reviewing any reimbursement above agreed amount. | Clerk/RFO review and documentation. | Completed | Expenses Policy page. 6 | Council | Built into MTC proforma and expenses policy. | May 2025 Full Council |
| Prohibit advance payments and require receipts. | Both policies enforce retrospective-only payments with receipts. | Completed | Expenses Policy page. 6; Honorary Policy page. 4 | Council | Fully supported in both documents. | May 2025 Full Council |
| Maintain professional memberships (NALC/SALC/SLCC) for advice. | Ensure annual renewal and consultation. | Ongoing | Membership documentation | Council | Not policy-covered but crucial. | Ongoing |
| Record all legal advice and include in reports. | Introduce legal log and require inclusion of legal power to act and/or solicitor's advice in Council reports. Ensure any/all legal advice is | Ongoing | Reports to council | Council | Important procedural addition; not currently policy-based. Should be added to reporting template | Ongoing |

| | provided in writing and attached to any council reports for reference. | | | | | |
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| Provide ongoing policy/legislation training. | Schedule annual induction and refreshers. | Ongoing | Training logs | Clerk | Supported by policy implementation context. | Ongoing |
| Recommendation: | Unambiguously determines in advance the amount of remuneration or the basis for remuneration of any person it engages | | | | | |
| Action | How? | Progress | Evidenced by | Action Owner | Comment(s) | Date Completed |
| Develop a standardised policy for honoraria/remuneration. | Adopt Honorarium Bonus, Expenses and Temporary Responsibility Allowance (TRA) Payments Policy | Draft Template in place (pending adoption) | Draft Honorarium Bonus, Expenses and Temporary Responsibility Allowance (TRA) Payments Policy. Pages 2–4 | Risk, Policy & Procedures Advisory Group. Town Clerk | Sets clear rules and caps for honoraria. | July 2025 (anticipated) |
| Require formal approval process before any remuneration. | Line manager, Clerk & Full Council resolution. | Draft Template in place (pending adoption) | Draft Honorarium Bonus, Expenses and Temporary Responsibility Allowance (TRA) Payments Policy. Page. 4 | Risk, Policy & Procedures Advisory Group. Town Clerk | Strong governance structure. | July 2025 (anticipated) |

| Maintain detailed records of all council payments ensuring transparency. All council payments made available for council and public review at monthly meetings | Document all payments made by council on a monthly basis. | Ongoing | Full Council minutes | Town Clerk | Satisfies transparency, supports audit trail, and promotes public confidence. | Ongoing |
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| Recommendation: | Determines in advance the basis for payments of expenses of any person it engages | | | | | |
| Action | How? | Progress | Evidenced by | Action Owner | Comment(s) | Completion Date |
| Define expenses and honoraria separately. | Ensure both policies distinguish clearly between them. | Completed | Both policies | Council | Avoids overlap or double payment. | May 2025 Full Council |
| Establish staff report template to include legal/financial powers. | Council reports follow same template. | Completed | Reports to council | Town Clerk | Not policy-based but important for broader decision-making. | Ongoing |
| Maintain professional memberships (NALC/SALC/SLCC) for advice. | Ensure annual renewal and consultation. | Ongoing | Membership documentation | Council | Not policy-covered but crucial. | Ongoing |
| Provide policy and legal training. | Induction and refresher sessions. | Ongoing | Staff and councillor logs | Town Clerk/Council | Reinforced by policy clarity. | Ongoing |
| Recommendation: | Does not make any payments in advance to any person it engages | | | | | |
| Action | How? | Progress | Evidenced by | Action Owner | Comment(s) | Completion Date |
| Only allow limited advance payments to external suppliers for goods/services, with explicit exclusion of | Update Financial Regulations to permit controlled pre-payment for suppliers under contract, but explicitly | In progress | Financial Regulations review | Risk, Policy & Procedures Advisory Group. Town | Ensures flexibility for operational procurement while maintaining strict control over governance-related payments | August 2025 (anticipated) |

| councillors and governance roles | prohibit advance payments to councillors or anyone in governance roles | | | Clerk. Deputy Clerk. | | |
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| Require post-verification by RFO or Clerk. | Use consistent proforma checked by Clerk/RFO | Completed | MTC expense form | Clerk. Deputy Clerk | Good audit controls. | Ongoing |
| Prevent segmented honoraria claims. | Clause included in draft policy; prevents split/staged payments | Draft Template in place (pending adoption) | Draft Honorarium Bonus, Expenses and Temporary Responsibility Allowance (TRA) Payments Policy Page 3 | Risk, Policy & Procedures Advisory Group. Town Clerk. Council | Essential to prevent circumvention of rules | July 2025 (anticipated) |
| Conduct periodic compliance checks. | Internal audit and random spot checks on expense claims | In progress | Audit reports | Internal Auditor. | Should be formalised into internal audit schedule going forward | Ongoing |
| Recommendation: | Obtains independent authoritative advice from a lawyer on any decision to settle or defend a claim against it; considers that advice and documents the basis for its decision. | | | | | |
| Action | How? | Progress | Evidenced by | Action Owner | Comment(s) | Completion Date |
| Establish a clear process of recruitment and management of all staff that includes probation periods and beyond | Use staffing sub committee to be able to support management to identify roles required and their recruitment methods. Ensure all new staff follow the same induction processes that only differ slightly from | Ongoing | Staff sub committee structure in place with regular meetings. Staff induction template in place and | Risk, Policy & Procedures Advisory Group. Town Clerk. Council | Ensures that any staffing complications are documented and staff are managed effectively and efficiently giving all parties the opportunity to discuss any concerns in a structured environment not allowing them to manifest. | Autumn 2025 (anticipated) |

| | whether or not they work in office or amenities. Ensure a clear ongoing staff management process through regular appraisals and one to ones. | | used when conducting all staff. Staff appraisals and one to one processes in place. | | | | |
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| Establish mandatory legal consultation policy for all potential claims | Create Legal Consultation Policy requiring independent legal advice before any decision to settle or defend claims above an agreed amount or involving employment/governance matters | In Progress | Draft Legal Consultation Policy | Risk, Policy & Procedures Advisory Group. Town Clerk. Council | Directly addresses auditor's key concern about lack of documented legal advice process. | Autumn 2025 (anticipated) | |
| Implement legal advice documentation requirements | All legal advice must be: 1) Obtained from a qualified solicitor, 2) Documented in writing, 3) Presented to Full Council, 4) Decision rationale recorded in minutes | In Progress | Draft Legal Consultation Policy & Council minutes | Risk, Policy & Procedures Advisory Group. Town Clerk. Council | Ensures compliance with auditor's requirement for documented decision-making basis | Autumn 2025 (anticipated) | |
| Additional Recommendations | | | | | | | |
| Action | How? | Recommendation Covered | Action Owner | Progress | Evidenced by | Comment(s) | Completion Date |
| Formally adopt the Honorarium Policy. | Risk, Policy & Procedures Advisory Group Review before Submission to Full Council for approval. | All remuneration and legality recommendations. | Council | Draft complete; adoption to be considered | Draft policy | Fills governance gaps. | July 2025 (anticipated) |

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| | | | | at July 2025 Full Council | | | |
| Include Expenses and Honorarium Policy in staff induction and manager training. | Add both policies to onboarding packs and annual training content | Promotes consistent application. | Clerk | To begin | HR/Training materials | Ensures awareness of policy limits from the outset | Ongoing |
| Review Honorarium Policy after six months. | Report to Council on payments and impact. | Ongoing improvement. | Risk, Policy & Procedures Advisory Group. Town Clerk. Council | Scheduled for Dec 2025 | Balanced and actionable review timeline. | Ensures implemented policy is being followed whilst offering opportunity for further strengthening. | December 2025 |
| Review MTC PIR Action list quarterly throughout the 2025/26 municipal year | Add quarterly review to Full Council meeting agendas | All PIR recommendations | Council | To begin | Council minutes | Maintains implementation momentum and visibility | Ongoing |