



## **MINEHEAD TOWN COUNCIL PUBLIC INTEREST REPORT ACTION PLAN**

**Created By:** Ben Parker

**Review Date:** 22<sup>nd</sup> April 2026 (Office Review)

**Approved by Council:** Tuesday 1<sup>st</sup> July 2025 (*Minute Number 2025/119*)

**Reviewed by Council:** Tuesday 16<sup>th</sup> December 2025 (*Minute Number 2025/215*)

**Additional Council Review:** Tuesday 28<sup>th</sup> April 2026

<b>Recommendation:</b> 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						
<b>Action</b>	<b>How?</b>	<b>Progress</b>	<b>Evidenced by</b>	<b>Action Owner</b>	<b>Comment(s)</b>	<b>Date Completed</b>
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	Completed	Policy Processes	Risk, Policy & Procedures Advisory Group. Town Clerk	Not addressed in current policy – separate policy required and legal advice must be attached to proposal	<b>November Full Council (Minute Number 2025/196)</b>
Establish a policy prohibiting any contractual or paid work arrangements between Council members and the Council, in compliance with UK regulations.	Adopt Honorarium Bonus, Expenses and Temporary Responsibility Allowance (TRA) Payments Policy containing an explicit prohibition.	Completed	Draft Honorarium Bonus, Expenses and Temporary Responsibility Allowance (TRA)	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	<b>July 2025 Full Council (Minute Number 2025/130)</b>

			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.	<b>May 2025 Full Council (Minute Number 2025/63)</b>
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.	<b>May 2025 Full Council (Minute Number 2025/63)</b>
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.	<b>May 2025 Full Council (Minute Number 2025/63)</b>
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 provided in writing and	Ongoing	Reports to council	Council	Important procedural addition; not currently policy-based. Should be added to reporting template	Ongoing

	attached to any council reports for reference.					
Provide ongoing policy/legislation training.	Schedule annual induction and refreshers.	Ongoing	Training logs	Clerk	Supported by policy implementation context.	Ongoing
<b>Recommendation:</b>	<b>Unambiguously determines in advance the amount of remuneration or the basis for remuneration of any person it engages</b>					
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	Completed	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.	<b>July 2025 Full Council (Minute Number 2025/130)</b>
Require formal approval process before any remuneration.	Line manager, Clerk & Full Council resolution.	Completed	Draft Honorarium Bonus, Expenses and Temporary Responsibility Allowance (TRA) Payments Policy. Page. 4	Risk, Policy & Procedures Advisory Group. Town Clerk	Strong governance structure.	<b>July 2025 Full Council (Minute Number 2025/130)</b>
Maintain detailed records of all council payments ensuring transparency. All	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

council payments made available for council and public review at monthly meetings						
<b>Recommendation:</b>	<b>Determines in advance the basis for payments of expenses of any person it engages</b>					
<b>Action</b>	<b>How?</b>	<b>Progress</b>	<b>Evidenced by</b>	<b>Action Owner</b>	<b>Comment(s)</b>	<b>Completion Date</b>
Define expenses and honoraria separately.	Ensure both policies distinguish clearly between them.	Completed	Both policies	Council	Avoids overlap or double payment.	<b>May 2025 Full Council (Minute Number 2025/63)</b>
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.	Implementation 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
<b>Recommendation:</b>	<b>Does not make any payments in advance to any person it engages</b>					
<b>Action</b>	<b>How?</b>	<b>Progress</b>	<b>Evidenced by</b>	<b>Action Owner</b>	<b>Comment(s)</b>	<b>Completion Date</b>
Only allow limited advance payments to external suppliers for goods/services, with explicit exclusion of councillors and governance roles	Update Financial Regulations to permit controlled pre-payment for suppliers under contract, but explicitly prohibit advance payments to councillors	Completed	Financial Regulations review	Risk, Policy & Procedures Advisory Group. Town Clerk. Deputy Clerk.	Ensures flexibility for operational procurement while maintaining strict control over governance-related payments	<b>July 2025 Full Council (Minute Number 2025/130)</b>

	or anyone in governance roles					
Require post-verification by RFO or Clerk.	Use consistent proforma checked by Clerk/RFO	Completed	MTC expense form	Clerk. Deputy Clerk	Good audit controls.	Implementation Ongoing
Prevent segmented honoraria claims.	Clause included in draft policy; prevents split/staged payments	Completed	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	<b>July 2025 Full Council (Minute Number 2025/130)</b>
Conduct periodic compliance checks.	Internal audit and random spot checks on expense claims	Ongoing	Audit reports	Internal Auditor.	Should be formalised into internal audit schedule going forward	Ongoing
<b>Recommendation:</b>	<b>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.</b>					
<b>Action</b>	<b>How?</b>	<b>Progress</b>	<b>Evidenced by</b>	<b>Action Owner</b>	<b>Comment(s)</b>	<b>Completion Date</b>
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 whether or not they work in office or amenities.	Completed/Ongoing	Staff sub committee structure in place with regular meetings. Staff induction template in place and used when conducting all	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.	<b>November Full Council (Minute Number 2025/196)</b>

	Ensure a clear ongoing staff management process through regular appraisals and one to ones.		staff. Staff appraisals and one to one processes in place.			
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	Completed	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.	<b>November Full Council (Minute Number 2025/196)</b>
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	Completed/Ongoing	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	<b>November Full Council (Minute Number 2025/196)</b>

#### 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	Complete	Current Policy	Fills governance gaps.	<b>July 2025 Full Council (Minute Number 2025/130)</b>
Include Expenses and Honorarium Policy in	Add both policies to onboarding packs and annual training content	Promotes consistent application.	Clerk	Ongoing	HR/Training materials	Ensures awareness of	Ongoing

staff induction and manager training.						policy limits from the outset	
Review Honorary Policy after six months.	Report to Council on payments and impact.	Scheduled	Risk, Policy & Procedures Advisory Group. Town Clerk. Council	Complete	Balanced and actionable review timeline.	Ensures implemented policy is being followed whilst offering opportunity for further strengthening.	<b>December 2025 Full Council (Minute Number 2025/215)</b>
Review MTC PIR Action list quarterly throughout the 2025/26 municipal year	Add quarterly review to Full Council meeting agendas	All PIR recommendations	Council	Ongoing	Council minutes	Maintains implementation momentum and visibility	Reviewed at December 2025 Full Council (Minute Number 2025/215) Reviewed at April 2026 Full Council
Undertake an annual assurance review of PIR-related governance arrangements.	Include a 12-monthly review within the Council's annual governance and internal control cycle, to confirm continued compliance with adopted policies and procedures.	All PIR recommendations.	Council/ Town Clerk	All actions completed and embedded. Ongoing compliance monitored.	Annual review report to Full Council; Council minutes.	Provides continued assurance that controls remain effective and proportionate, and that the Council continues to operate within adopted policies and legal powers.	Annual (first post-completion review to be undertaken within 12 months from final PIR review)